



An
Bord
Pleanála

Inspector's Report ABP-318565-23

Development	Proposed compressor plant at Bellanaboy Bridge Gas Terminal
Location	Bellagelly South, Co. Mayo
Planning Authority	Mayo County Council
Prospective Applicant(s)	Vermilion Exploration and Production Limited
Type of Application	SID Pre-Application Consultation under S.182E of the Planning and Development Act 2000, as amended.
Date of Consultation Meeting(s):	N/A
Date of Site Inspection	19 th January 2024
Inspector	Jimmy Green

1.0 Introduction

- 1.1. The Board received a request on 24th November 2023 from Vermilion Exploration and Production Ireland Ltd. (VEPIL) to enter into pre-application consultations under section 182E of the Planning and Development Act 2000, as amended, (“the Act”) in relation to the proposed installation of a compressor plant at Bellanaboy Bridge Gas Terminal (BBGT), in the townland of Bellagelly South, County Mayo.
- 1.2. This report provides an overview of the proposed development, relevant planning cases and legislative provisions and recommends that the proposed development does not constitute strategic infrastructure.
- 1.3. A pre-application consultation was not considered necessary in relation to the pre-application request as I consider that there is sufficient detail available in the pre-application documentation submitted by the applicant having regard to the established planning history on site and following site inspection.

2.0 Site Location and Description

- 2.1. The proposed development site is located within an the existing Bellanaboy Bridge Gas Terminal facility operated by the prospective applicants in the townland of Bellagelly South, County Mayo. The existing gas terminal facility is located on the R312 which connects Belmullet (approximately 15km to the west), with Ballycastle, (approximately 30km to the east). The facility is set back approximately 200m from the edge of the regional road, and is serviced by its own internal private road network with gated and security-controlled access. Overall the gas terminal is bounded by, and set within, mature coniferous forestry.
- 2.2. The site of the proposed compressor plant is located in the north-east portion of the existing gas terminal compound area. The location of the proposed works is adjacent to the the existing firewater pond immediately to the west, the flare sterile area to the south and existing site/access roads to the north and east. The site of the proposed compressor plant is located within the fenceline of the established gas terminal and is currently in use as an open storage area for various truck trailers, storage of materials and a container.

3.0 Proposed Development

- 3.1. The existing gas terminal facility has been operational for a number of years (having received planning permission initially in 2004) and receives (and separates) gas from the offshore Corrib gas field for transmission to the national gas network. The documentation accompanying the request describes how the existing terminal has been designed to receive and process a plateau flow of 350 million standard cubic feet per day of gas. As the gas has been extracted the gas field itself has depleted which results in the flow and arrival pressure of the gas to the terminal falling. This fall in pressure affects the functionality of the plant which leads to inefficiencies in the overall terminal operations. This is part of the natural cycle of such facilities and gas fields and it is established practice to provide ancillary plant to such gas terminals as their gas fields move through their operational life to ensure efficient and optimum operations.
- 3.2. In this regard the most recent upgrade to the existing terminal is the provision of a gas refrigeration and dew point control plant which is currently under construction. The refrigeration plant was subject to pre-application consultation with the Board (313808-22 refers) which concluded that the works were not Strategic Infrastructure Development (SID). Subsequently a planning application was made to Mayo County Council (Pl. Ref. 22/887) and planning permission was granted January 2023.
- 3.3. The falling gas reservoir pressure has led to the need to provide for additional alterations to the existing gas terminal and the proposed compressor plant subject of this pre-application consultation is now required to ensure that gas compression is optimised and modified in order to allow gas production and its provision onto the national network to continue in an appropriately efficient manner. The need for such works as the gas field matured was identified in the EIS which was submitted with the original planning application for the gas terminal (Mayo Pl. Ref. 03/3343, ABP PL16.207212), albeit it was acknowledged that the exact extent and nature of any such additional modifying works could only be determined and designed once an understanding of the operating history and characteristics of the gas field were established.
- 3.4. The prospective applicant has stated that the proposed development is ancillary to the main use of the gas terminal and that the gas terminal would continue to operate

in the absence of the proposed compressor plant albeit operations would be less efficient.

3.5. The footprint of the proposed compressor plant is 0.2ha with the compressor building being c.3,000sqm, incorporating a pipe rack c.50m in length, an equipment room and new access roads. The proposed compressor building is to be attached to the existing plant by a pipe rack extending over the existing access road. The main elements of equipment are:

- Compressor building (incorporating foundations for 2 no. compressors, portal frame construction),
- Two compressor packaged skids (including compressor, gas engine driver, oil scrubbers, engine cooling system, and associated instrumentation and controls),
- Exhaust system (including continuous emissions monitoring system and waste heat recovery),
- Process gas cooling and interstage cooling,
- Interconnecting pipe work,
- Pipe rack, pipe bridge, and valve support structure,
- Equipment room,
- Electrical and instrumentation cabling, and
- Associated electrical plant modifications and integration.

3.6. Currently gas is compressed using centrifugal gas compressors located in the sales gas compressor building at the terminal. The subject modifications and compression upgrades to the terminal comprises the installation of reciprocating compressors which will be housed in a new compressor building at the location shown on the submitted drawings. This location is proposed as it is considered to be high risk and inefficient to replace the existing compressors at their current location which is adjacent to live operating gas turbines.

4.0 Relevant Planning History

- **PI. Ref. P03/3343, ABP ref. PL16.207212:** Permission granted in October 2004 for construction of a gas terminal for the reception and separation of gas from the Corrib gas field and for a peat deposition site, at Bellagelly South, Srahmore, Attavally, Bangor Erris, Co. Mayo. The duration of this permission was extended on two occasions. On 16th November 2009 under PI. Ref. 03/33430, the planning authority extended the duration to 21st December 2012. It was extended again on 17th April 2012 under PI. Ref. 03/334300 to the 21st May 2017.
- **PI. Ref. 07/3322:** Permission granted in 2008 for relocation of a sump chamber, to provide above ground services, install a valve pit; a CCTV mast and camera; a stone wall to the east of the entrance; and ancillary works and landscaping.
- **ABP Ref. GC16.GC0001:** In respect of the proposed re-routing of the onshore upstream gas pipeline relating to Corrib Gas Field Project, Co. Mayo, it was determined that such development did constitute strategic infrastructure development.

In respect of proposed amendments to the permitted Bellanaboy Bridge Gas Terminal (which was under construction at the time), the Board determined that the proposed amendments to the terminal did not constitute strategic infrastructure as the terminal had been subject of an application for planning permission before the coming into effect of the Strategic Infrastructure Act and was granted permission under Section 34 of the 2000 Act. Decision issued April 2008.

- **PI. Ref. 08/170, ABP Ref. PL16.229487:** Permission granted in 2008 for modifications and alterations to the permitted gas terminal (03/3343), including increased finished floor level of the administration, maintenance and laboratory complex buildings, increase in the size of the laboratory, relocation of services adjacent to the buildings and addition of a new septic tank and pump chamber, amendments to the wastewater treatment building and reorganisation and layout of adjacent plant equipment, increasing the height of the permitted lime silo, repositioning of a permitted water storage tank,

provision of three recyclable carbon filter skids, amend the levels of the east-west access road and other minor works

- **PI. Ref. 08/774:** Permission granted in 2008 for amendments to the sales gas compressor building, the heat medium fired heater, the heating medium surge drum and associated equipment.
- **PI. Ref. 08/1182:** Permission granted in 2008 for amendments to the power generation building and addition of a selective catalytic reduction building and an associated urea solution storage tank and transfer pumps.
- **PI. Ref. 08/1620, ABP Ref. PL16.231952:** Permission granted in 2009 for amendments to the Bellanaboy Bridge Gas Terminal (03/3343, PL16.207212), relating to the relocation and resizing to the emergency holding tank and the addition of an ESB switch room and transformer near the main entrance.
- **PI. Ref. 09/20:** Permission granted in 2009 for additional fire shields around the termination unit and hydraulic power unit; a heat shield along the pipe rack, stair towers and an access platform for the used firewater pond; to relocate an emissions monitoring system and analyser and fire and gas detectors; enlarge a gas metering cabinet; modify access platforms; replace ladders with stairs and platforms; and remove culvert and ramp over an internal road.
- **PI. Ref. 09/196:** Permission granted in 2009 to add a cold separator vessel and to modify access to a fire monitor.
- **PI. Ref. 09/1248:** Permission granted in 2010 for a security fence around the terminal platform and amend access points in authorised fence; ramps and paving at the control building; CCTV cameras; relocation of petrol interceptor; re-arrange and extend garden; alter ground cover around flare stack; omit faunal gates.
- **PI. Ref. 10/633:** Permission granted in 2010 to discharge treated water from the site to the sub-sea manifold up to 80m³ per day with any surplus trucked off site, and to relocate 2 water samplers.
- **PL16.GA0004** – The Board approved an onshore upstream gas pipeline for the Corrib project which extended into the gas terminal in January 2011.

- **PI. Ref. 11/56:** Permission granted in 2011 for changes to drainage arrangements on site including the permanent use of two settlement ponds, local ground level changes, provision of additional fencing and other associated equipment and works.
- **PI. Ref. 12/603:** Permission granted in 2013 for amendments to landscaping associated with the removal of peat from the site.
- **PI. Ref. 13/2:** Permission granted in 2013 for storage access on the east-west pipe rack; various step overs; external stairs on the control building; a ladder and platform at the valve actuator at the pig launcher; stairs and platforms to access tanks and vessels; omitting davits; changes to piping around the offshore terminal termination unit and hydraulic power unit.
- **PI. Ref. 13/68:** Permission granted in 2013 for wind socks; fire monitors; pole mounted lights; a remote valve station and monitor adjacent to the emergency holding tank; safety barriers along site roads; relocate emissions monitoring system; extending the sales gas compressor building and amending its doors and the road layout around it; relocate fire and gas detectors; an additional depressurization valve on the export gas pipe rack; provide storage containers to the west of the firewater pump building.
- **PI. Ref. 13/232, ABP ref. PL16.242283:** Permission granted in 2013 for amendments to the permitted gas terminal (P03/3343) providing lubrication oil tank with support frame, methanol injection pump, 8 heat detectors, response team storage building.
- **PI. Ref. 13/355:** Permission granted for amendments to permitted gas terminal element (03/3343) and to development subsequently permitted under PI. Ref.'s 10/633 and 13/68, including addition of an enclosure to house a water mist system and associated works.
- **PI. Ref. 13/561:** Permission granted for amendments to permission (PI. Ref. 03/3343) and to development subsequently permitted under (PI. Ref.'s 09/1248 and 13/68), including the replacement of palisade fence, replacement of the existing 1.8m high vehicular emergency access, flood lights, amendments to pipework, changes to road surface and associated works.

- **ABP Ref. ABP-302012-18:** Pre-application consultation under which it was determined that a proposed new water treatment plant to provide an additional level of water treatment at existing Bellanaboy Bridge Gas Terminal, did not fall within one or more of the paragraphs specified in the condition contained in section 37A (2) of the Planning and Development Act, 2000, as amended, and that a planning application should be made in the first instance to Mayo County Council.
- **PI. Ref. 18/730:** Permission granted for provision of ground water treatment plant within the terminal footprint, storage tanks and associated works
- **ABP Ref. ABP 313808-22:** Pre-application consultation under which it was determined that the proposed installation of a refrigeration plant did not satisfy any of the conditions contained in section 37A(2)(a), (b), or (c) of the Planning and Development Act 2000, as amended, and that therefore a planning application should be made in the first instance to Mayo County Council. Determination issued in September 2022.
- **PI. Ref. 22/887:** Permission granted for construction of a refrigeration unit (closed loop propane system connected to the existing gas process facilities) in February 2023 (currently under construction).

5.0 Case made by Prospective Applicant

5.1. The Prospective Applicant references the previous consideration of An Bord Pleanála in relation to the refrigeration unit pre-application consultation (ABP-313808-22) and makes the following points:

- The 2000 Act defines Strategic Gas Infrastructure Development as “...*any proposed development comprising or for the purposes of a strategic downstream gas pipeline or a strategic upstream gas pipeline, and associated terminals, buildings and installations, whether above or below ground, including any associated discharge pipe*”. The proposed development could be considered as an ‘installation’ associated with a gas pipeline, and accordingly this consultation request is being taken under section 182E(1) of the Act, albeit that the Prospective Applicant is of the opinion that the proposed development does not comprise SID.

- The previous Board determination under ABP Ref. PL16.GC0001 in November 2007, highlighted that the proposed amendments to the gas terminal facility did not constitute Strategic Infrastructure Development (SID) as the original application for that part of the development was determined under Section 34 of the Planning and Development Act, 2000 (as amended) and not under SID legislation.
- The Inspector's Report in respect of the parent permission noted that as the Corrib gas field/reservoir is used, pressure falls and that later in the lifespan of operations the terminal may need to be slightly modified.
- The inspectors report on 313808-22¹ (pre-application consultation in relation to the refrigeration unit) is referenced and in particular the points which were considered of relevance to the inspector in that assessment, namely – (a) that the terminal can continue to operate in the absence of the proposed development, (b) the relative scale of the proposed development and its ancillary nature in the context of the existing terminal, and (c) that the works would not affect the area of more than one planning authority. The outcome of that pre-planning process was that the works were not considered to be SID by the Board.
- The Prospective Applicant acknowledges that the while the proposed compressor plant may come within the scope of Strategic Gas Infrastructure Development of the Act, it does not represent development which is of strategic importance. Section 182(C) of the Act refers to gas infrastructure having to come within the scope of section 37A(2) to be considered as strategic. In relation to these criteria the Prospective Applicant notes the following:
 - The proposed compressor plant will compress the gas to ensure it can be used within the national gas network. It is ancillary to the main

¹ In this regard the Board should note that the Prospective Applicant has throughout their submission referred to the incorrect ABP reference number when referring to the pre-application consultation for the previously determined refrigeration unit. ABP-313909-22 is referenced by the prospective applicant throughout, which refers to an undecided (at time of writing) application for substitute consent south east of Gort, Co. Galway. ABP-313808-22 refers to the Boards pre-application consideration of the refrigeration plant at the existing Bellanaboy Bridge Gas Terminal.

terminal and cannot be considered to be of strategic or social importance to the State or Region.

- It is acknowledged that the existing overall gas terminal contributes to the fulfilment of national and regional policies, however, the proposed compressor plant is being brought forward to deal with declining reservoir pressure which is common in such facilities and cannot be considered in itself to contribute to national or regional policies.
- The proposed development does not have any transboundary effects and will not impact on the area of any other planning authorities.
- The Prospective Applicant notes that the Board has previously considered plant of this nature (i.e. the refrigeration unit ABP-313808-22) to be ancillary to the gas terminal, the proposed development is similar in character to that previously determined plant and accordingly cannot be considered SID.
- The Prospective Applicant concludes by seeking expedited consideration of this matter requesting that should a meeting be required that it be scheduled as soon as practicable, and/or that an early determination be provided.

6.0 Legislative Provisions

6.1. Section 2(1) of the Planning and Development Act 2000, as amended defines 'strategic infrastructure' as including, inter alia:

“(e) any proposed strategic gas infrastructure development referred to in section 182C(1),”

Earlier the same section of the Act provides the definition of *“strategic gas infrastructure development”* as meaning *“any proposed development comprising or for the purposes of a strategic downstream gas pipeline or a strategic upstream gas pipeline, and associated terminals, buildings and installations, whether above or below ground, including any associated discharge pipe;”*

Definitions are also provided for a strategic downstream gas pipeline which is *“any proposed gas pipeline, other than an upstream gas pipeline, which is designed to operate at 16 bar or greater, and is longer than 20 kilometres in length”*, and strategic upstream gas pipeline, which is defined as *“any gas pipeline proposed to*

be operated or constructed – (a) as part of a gas production project, or (b) for the purpose of conveying unprocessed natural gas from one or more than one such project to a processing plant or terminal of final coastal landing terminal...

- 6.2. Section 182(C)(1) in relation to strategic gas infrastructure development states the following:

“Where a person (hereafter referred to in this section as the ‘undertaker’) intends to carry out a strategic gas infrastructure development (hereafter referred to in this section and section 182D as ‘proposed development’), and where the Board determines following consultations under section 182E that the development comes within paragraph (a), (b) or (c) of section 37A(2), the undertaker shall prepare, or cause to be prepared -

- (a) an application for approval of the development under section 182D, and*
- (b) an environmental impact statement or Natura impact statement or both of those statements, as the case may be in respect of the development,*

and shall apply to the Board for such approval accordingly....”

- 6.3. Section 182E of the Act states that a Prospective Applicant *“who proposes to apply for approval under section 182B or 182D, shall before making the application, enter into consultations with the Board in relation to the proposed development.”*

- 6.4. Section 37A refers to the Board’s jurisdiction in relation to certain planning applications and refers as follows:

“(1) An application for permission for any development specified in the Seventh Schedule (inserted by the Planning and Development (Strategic Infrastructure) Act 2006) shall, if the following condition is satisfied, be made to the Board under section 37E and not to a planning authority.

(2) That condition is that, following consultation under section 37B, the Board serves on the prospective applicant a notice in writing under that section stating that, in the opinion of the Board, the proposed development would, if carried out, fall within one or more of the following paragraphs, namely –

- (a) *the development would be of strategic economic or social importance to the State or the region in which it would be situate,*
- (b) *the development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or in any Regional Spatial and Economic Strategy in force in respect of the area or areas in which it would be situate,*
- (c) *the development would have a significant effect on the area of more than one planning authority."*

7.0 Consultations

- 7.1. The Prospective Applicant has submitted documentation to the Board under the provisions of Section 182E of the Act, in order to enter into pre-application consultations. I note that the applicant's position is that the proposed development does not constitute Strategic Gas Infrastructure Development and that therefore it is not their intention to lodge an application under 182D (i.e. direct application for approval to the Board of strategic gas infrastructure development), however, they have entered into pre-application consultations to obtain confirmation from the Board in this regard.
- 7.2. I do not consider it necessary to hold a pre-application consultation meeting as there is sufficient and comprehensive information on file and there is a significant established planning history on site. In my opinion, there are no outstanding issues which need to be addressed to inform the Boards consideration on this matter.
- 7.3. The pre-application documentation submitted includes:
- A cover letter providing details of the site location and context, overview and rationale for the proposed development, description of the proposed compressor plant and its nature, as well as a discussion of the proposed works in the context of the relevant strategic infrastructure development legislation.
 - General site location map (at a scale of 1:10,560), Site location map (1:2,500), as well as two compressor plant layouts (1:125).

8.0 Strategic Infrastructure Assessment

- 8.1. The proposed compressor plant is to be installed and operated as part of the operations at the existing gas terminal facility. While the scale of the proposed compressor plant can be considered as small in the context of the overall facility, I note that the existing terminal constitutes an “installation”, which from the definitions set out in section 2(1) of the Act (as set out in section 6 above) includes any terminals, buildings and installations, whether above or below ground, including any associated discharge pipe associated with either a strategic downstream gas pipeline or a strategic upstream gas pipeline.
- 8.2. Therefore, under the definitions of the Act the proposed development could comprise strategic gas infrastructure development, and accordingly the Board must further consider the requirements under section 182(C)(1) of the Act in order to make a determination as to whether the development falls within one or more of the paragraphs under section 37A(2)(a), (b) or (c). These criteria are set out and considered as follows:

(a) the development would be of strategic economic or social importance to the State or the region in which it would be situate,

The existing gas terminal is of strategic importance to the state, processing nationally important levels of natural gas for the national gas network. Reserves in the Corrib field are declining, and the associated pressure reductions require further processing / compressing of the gas in order to meet the requirements for injection into the national network. Such reduction in pressure and the future requirement for modifications in the plant was foreseen in original design and planning applications for the terminal and gas pipeline.

The Prospective Applicants have confirmed in the application documentation that the terminal can continue to operate in the absence of the proposed compressor plant, however, this would result in sub-optimal operating conditions and in my opinion, would not represent the most efficient use of this valuable resource and the established infrastructure. Gas compression is already being undertaken within the terminal by using centrifugal compressors, however, with the falling reservoir pressure, it is considered that the provision of reciprocating compressors represents a more efficient means of ensuring ongoing gas

production to the national network, thus optimising the plant and processes carried out at the terminal.

Accordingly, I regard the proposed development as part of, and ancillary to, the overall processes already carried out at the terminal. I do not regard the proposed development as being of a nature or scale which would of itself be of strategic economic or social importance to the State. In support of this conclusion, I note also that previous Section 182E requests in respect of ancillary development at the site (including ABP- ABP-302012-18 [relating to a new water treatment plant, and 313808-22 [relating to the proposed installation of a refrigeration plant]), were determined by the Board not to constitute strategic infrastructure development.

(b) the development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situate,

Having regard to the scale and ancillary nature of the proposed development, I do not consider that it could in itself be seen to contribute substantially to the fulfilment of any of the objectives set out in the National Planning Framework or any objectives set out in the RSES.

(c) the development would have a significant effect on the area of more than one planning authority.

As I have determined previously above, I consider that the development is ancillary to the operation of the existing terminal and accordingly I am also of the opinion that the proposed development will not have a significant effect on the area of more than one planning authority.

- 8.3. Having regard to the above, I consider that the proposed development does not fall within any of the paragraphs set out in section 37A(2)(a), (b), or (c) of the Planning and Development Act, 2000 (as amended) and consider therefore that the proposed development does not constitute a strategic infrastructure development.

9.0 Conclusion

Having regard to the foregoing, I am of the opinion that the proposed development would not satisfy any of the conditions contained in section 37A(2)(a), (b), or (c) of the Planning and Development Act 2000, as amended. Therefore, I agree with the prospective applicant that this proposed development does not constitute a strategic infrastructure development.

10.0 Recommendation

I recommend that the prospective applicants, Vermillion Exploration and Production Ireland Ltd. be informed that the proposed development, consisting of the installation of a compressor plant at the existing Bellanaboy Bridge Gas Terminal, in the townland of Bellagelly South, Co. Mayo, does not fall within one or more of the paragraphs specified in the condition contained in section 37A (2) of the Planning and Development Act, 2000, as amended, and that a planning application should therefore be made in the first instance to Mayo County Council.

I confirm that the report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.



Jimmy Green

Senior Planning Inspector

30/01/2024