



An
Coimisiún
Pleanála

Inspector's Report

ACP-323897-25

Development

Proposed development of a 680 MW peaking gas fired power generation station and associated 400kV GIS substation

Location

at Kilshane Road, Kilshane, Finglas, Dublin 11

Prospective Applicant(s)

Kilshane Energy Ltd

Type of Application

Pre-application consultation under 37B of the Planning and Development Act 2000 (as amended)

Planning Authority

Fingal County Council

Date of Site Inspection

27th February 2026

Inspector

Rachel Gleave O'Connor

1.0 Introduction

- 1.1.1. Kilshane Energy Ltd is seeking confirmation from An Coimisiún Pleanála as to whether a proposed development of a 680 MW Gas-Fired Generation Station at Kilshane Road would constitute Strategic Infrastructure Development.

2.0 Site Location and Description

- 2.1.1. The subject site is located to the south and east of Kilshane Road, and west of the N2. The existing entrance to the subject site is situated on Kilshane Road, just west of the Kilshane Road bridge over the N2. Works have commenced to the north of the site fronting onto Kilshane Road to associated application 317480 for a new Gas Turbine Power Generation Station with an output of up to 293 Megawatts, which will create a new access which would be relied upon by the current proposed development. A small number of one-off houses are located opposite the site and to the north of Kilshane Road. The remaining lands surrounding the site are largely comprised of agricultural fields, with the businesses and commercial/industrial sheds appearing in the wider vicinity east and west of the site. Huntstown Quarry, Huntstown Power Station and anaerobic digestion facility are located further to the south of the site.
- 2.1.2. The subject site itself is comprised of grassland, with hedgerows marking field boundaries. To the north of the site is a construction site, where works are underway to construct an associated gas turbine power station also within the applicant landholding. The applicant's landholding extends to the north, west and southwest of the subject site.

3.0 Proposed Development

- 3.1.1. The proposed development comprises 2no. Gas Turbine Power Generation Stations with an output of up to 340 MW each, equating to a total output of up to 680 MW, along with associated ancillary structures, and services, including an Air Insulated Substation adjacent to one of the turbines. The proposal also includes a 400kV gas-insulated substation building and associated compound to serve the proposed generation station. The submitted pre-application request states that the Flexible Peaking Plant proposed is a Gas Turbine Power Generation Station, that can quickly

dispatch power to balance fluctuating electricity demand in the grid due to intermittent renewable supplies, and to avoid power outages, ensuring security of electricity supply.

4.0 Pre-Application Consultation Meetings

- 4.1.1. A pre-application consultation meeting was held in relation to the proposal via Microsoft teams on 12th February 2026. Discussion focused on the specifics of the proposed development, interrelationship with the approved gas power station adjacent to the site, and consistency with the climate agenda.
- 4.1.2. By letter dated 23rd March 2026, the applicant requested that the pre-application process be concluded.

5.0 Precedent Decisions

There are a number of precedent decisions in relation to developments of this nature, there are summarised in the table below:

Table 1: Precedent Pre-Application Decisions

ABP Ref.	Development Description	Decision Date	ABP Decision
320566	600MW peaking plant power generation station comprising 2no. open cycle gas turbines. (Kilshane Road, Finglas, Dublin 11).	25/09/2024	Is SID
315916	Power plant comprising a Combined Cycle Gas Turbine unit 570MW and an Open Cycle Gas Turbine 140MW unit.	04/07/2023	Is SID
315479	Gas Turbine Generation Station with an output of up to 293MW.	08/05/2023	Not SID
314003	Open Cycle Gas Turbine plant and ancillary connection infrastructure with an output of up to 299MW.	25/08/2022	Not SID
311877	293MW Power Station and all associated site works. (Kilshane, Finglas, Co. Dublin).	13/12/2021	Not SID

6.0 Prospective Applicants Case

6.1.1. Together with the pre-application documentation, the principle points made by the applicant that the proposed development constitutes SID were:

- The proposed development is a thermal power station with a total energy output of up to 680 megawatts, significantly exceeding the threshold under the Seventh Schedule.
- The development would be of strategic economic or social importance.
- The 2025 Climate Action Plan specifically requires the development of 2GW of new flexible gas plant nationally by 2030.
- The development supports the delivery of each of the criteria under section 15 of the Climate Action and Low Carbon Development Act.
- The delivery of reliable and more sustainable electricity system for the State is a key pre-requisite for economic development and stability.
- The proposed development directly contributes to meeting a key objective of the most recent approved Climate Action Plan 2025 and the objectives of the 2023 Long Term Climate Action Strategy, the 2024 National Adaptation Framework, the national climate objective and the objective of mitigating GHG emissions and adapting to the effects of climate change, as proposals will facilitate emissions reduction and greater renewable energy deployment in the electricity sector.
- The development will make a significant contribution to the realisation of the 2GW target for new flexible gas-fired generation set out in CAP25.
- The development of reliable and flexible electricity supply is highlighted in Energy Security in Ireland to 2030.
- Circular PL 12/2021 highlights that the development of gas-fired energy generation is a national priority to ensure security of electricity supply.
- The development would contribute substantially to the fulfilment of objectives in the NPF / RSES. Specifically NPO 61, 69, 70 and RPO 10.20.

7.0 Legislative Provisions

7.1.1. Planning and Development Act 2000, as Amended ('the Act')

7.1.2. The Board is asked to decide if the proposal as outlined is or is not strategic infrastructure development (SID).

7.1.3. Section 37A(1) of the Act provides that an application for permission for any development specified in the Seventh Schedule shall be made directly to the Board if the proposed development would fall within one or more of the following paragraphs as set out in subsection (2):

(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 (NPF) or in any regional Spatial and Economic Strategy (RSES) 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.

7.1.4. Class 1 of the Seventh Schedule relates to energy infrastructure and includes the following category of development:

'A thermal power station or other combustion installation with a total energy output of 300 megawatts or more'.

8.0 Assessment

8.1.1. My assessment will address whether the proposal comprises Strategic Infrastructure Development with reference to the relevant sections of the Act as set out below.

8.1.2. **Section 37A (1) – Is the proposed development specified in the Seventh Schedule of the Planning & Development Act, 2000 (as amended)?**

8.1.3. As stated above, Class 1 of the Seventh Schedule of the P&D Act 2000 (as amended) includes the following category of development:

'A thermal power station or other combustion installation with a total energy output of 300 megawatts or more'.

8.1.4. Having regard to the information submitted by the prospective applicant, including at the meeting and in particular the description of the proposed development which comprises the development of a Gas Turbine Power Generation Station with a total output of up to 680 MW, formed of 2 no. open cycle gas turbines with outputs of up to 340 MW each, I am satisfied that the proposed development comprises 'a thermal power station or other combustion installation with a total energy output of 300 megawatts or more'.

8.1.5. As the expected total output of the proposed plant would be 680MW, the proposed development would exceed the relevant threshold set out under 'Energy Infrastructure' class 1 of the Seventh Schedule. Therefore, I consider that the proposed development is SID within the meaning of the Seventh Schedule of the Planning & Development Act, 2000 (as amended).

8.1.6. **Section 37A (2) – Does the proposed development fall within one or more of sections 37A (2) (a), (b), or (c)?**

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

8.1.7. The Climate Action Plan 2025 (CAP 25) builds upon the Climate Action Plan 2024 (CAP 24) by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings. Both CAP 25 and 24 should be read together. The CAP includes KPIs for 2025 and 2030, including a National Target to 2030 for New Flexible Gas Plant of at least 2 GW. The CAP states that rapid delivery of flexible gas generation is needed at scale and in a timeframe to replace emissions from coal and oil generation as soon as possible to reduce impacts on the carbon budgets. The CAP further states that the introduction of renewable gas generation into the grid is an important factor of ensuring a security of supply for Ireland's electricity system.

8.1.8. Ireland's energy security strategy, 'Energy Security in Ireland to 2030' was published in 2023. It outlines our national plan to ensure energy security, as we transition to a carbon-neutral energy system by 2050. The plans for the electricity system are outlined, with focus on the addition of renewable generation, demand-side flexibility,

new gas-fired generation as flexible back-up, interconnection and storage, to secure our electricity supplies.

8.1.9. Ministerial Circular Letter PL 12/2021 states that ‘the development of new conventional generation (including gas-fired and gasoil distillate-fired generation) is a national priority and should be permitted and supported in order to ensure security of electricity supply and support the growth of renewable electricity generation’.

8.1.10. Having regard to the Climate Action Plan 2025, Ireland’s energy security strategy, ‘Energy Security in Ireland to 2030’ (2023) and to Circular Letter PL 12/2021 and to the nature and scale of the proposed development, with an expected power output of 680MW, I consider that the proposed development would be of strategic economic and social importance to the state and the region and would therefore satisfy s37A (2) (a) of the Act.

(b) The development would contribute substantially to the fulfilment of any of the objectives in the NPF or in any RSES in force in respect of the area or areas in which it would be situate

8.1.11. The First Revision of the National Planning Framework (2025) includes the following National Policy Objectives (NPO) of relevance:

8.1.12. NPO 61 of the National Planning Framework (NPF) states:

“In co-operation with relevant Departments in Northern Ireland, strengthen all-island energy infrastructure and interconnection capacity, including distribution and transmission networks to enhance security of electricity supply.”

8.1.13. While reference is made to co-operating with Departments in Northern Ireland to strengthen all-island energy infrastructure, this wording does not preclude relevant infrastructure projects in the Republic of Ireland, such as the subject of this pre-app consultation, to enhance security of electricity supply.

8.1.14. NPO 69 states:

“Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.”

8.1.15. As set out above, the proposed development will substantially contribute to a stated KPI in the Climate Action Plan 2025 to deliver at least 2 GW of new flexible gas-fired generation nationally.

8.1.16. NPO 70 states:

"Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050."

8.1.17. The proposed gas-fired electricity generation facility will, according to application documentation, "enable the retirement of inefficient and carbon intensive generation assets on the national grid, and the wider rollout of renewable energy in the region and the State." The proposed development will support the transition of the energy system to a greater percentage of renewable sources while providing for security of energy supply. Having regard to the foregoing, I am satisfied that the proposed development will contribute to meeting national objectives towards achieving a low carbon economy by 2050.

8.1.18. With respect to the Eastern and Midland Regional and Spatial Economic Strategy (RSES), Regional Policy Objective (RPO) 10.20 states:

"Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy. This includes the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity and gas transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process."

The proposed development would contribute substantially to this objective in the RSES.

8.1.19. Having regard to the foregoing, I consider the proposed development would contribute substantially to the fulfilment of NPO 61, NPO 69, NPO 70 of the NPF and RPO 10.20 of the RSES and satisfies s37A (2) (b) of the Act in this regard.

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

8.1.20. Notwithstanding that the proposed development would have wider energy supply benefits beyond Fingal County Council, the applicant states that the proposed development would not be likely to have a significant effect on the area of more than one planning authority. Having regard to the foregoing and information provided by the applicant during the pre-application consultation process I am of the opinion that the proposed development would not have a significant effect on the area of more than one planning authority and does not therefore satisfy s37A (2) (c) of the Act.

9.0 Conclusion

9.1.1. Based on the above assessment, it can be concluded that the proposed development would exceed the threshold set out in the Seventh Schedule of the Act and therefore satisfies the requirements of s.37A (1) of the Act. It can also be determined that the proposed development is of strategic importance by reference to the requirements of sections 37A(2)(a) and (b) of the Act. Accordingly, the proposed development constitutes strategic infrastructure.

10.0 Recommendation

10.1.1. I recommend that the Board serve a notice on the prospective applicant, pursuant to s. 37B (4) of the Planning & Development Act, 2000 (as amended), stating that it is of the opinion that the proposed development constitutes a strategic infrastructure development within the meaning of section 37A of the Act for the reasons and considerations set out below.

11.0 Reasons and Considerations

11.1.1. Having regard to the anticipated energy output of the proposed thermal power station it is considered that the proposed development constitutes development that falls within the relevant definition of energy infrastructure in the Seventh Schedule of the Planning & Development Act, 2000 (as amended), thereby satisfying the requirements set out in section 37A(1) of the Act.

11.1.2. The proposed development is also considered to be of strategic importance by reference to the requirements of sections 37A(2)(a) and (b) of the Planning & Development Act, 2000 (as amended). An application for permission for the proposed development must therefore be made directly to An Bord Pleanála under section 37E of the Planning & Development Act, 2000 (as amended).

I confirm that this 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.


Rachel Gleave O'Connor

Senior Planning Inspector

8th April 2026

Appendix – Prescribed bodies

The following prescribed bodies are considered relevant for the purpose of s37E(3)(c) of the Act:

- Department of Planning and Local Government and Heritage
- Minister of Environment and Climate & Communications
- Fingal County Council
- Transport Infrastructure Ireland
- National Transport Authority
- Eastern and Midland Regional Assembly
- Irish Water
- Inland Fisheries Ireland
- Irish Aviation Authority
- The DAA
- EPA
- HSE
- Health and Safety Authority
- The Commission for Energy Regulation
- Office of Public Works
- ESB
- Eirgrid
- An Taisce
- An Chomhairle Ealaíon
- Fáilte Ireland
- The Heritage Council

Further notifications should also be made, where deemed appropriate.