

An  
Coimisiún  
Pleanála

## **Inspector's Report ABP-324354-26**

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|---------------------------------|-----------------------------------------------------------------------------------------------------|
| <b>Development</b>              | Proposed 385 MW Open Cycle Gas Turbine (OCGT) Plant at the Roadstone Barrigone Quarry Site          |
| <b>Location</b>                 | Located at Barrigone Quarry<br>Askeaton, Co. Limerick                                               |
| <b>Prospective Applicant(s)</b> | Cultaca Limited                                                                                     |
| <b>Type of Application</b>      | Pre-application consultation under Section 37B of the Planning and Development Act 2000, as amended |
| <b>Planning Authority</b>       | Limerick City and County Council                                                                    |
| <b>Date of Site Inspection</b>  | 9 <sup>th</sup> of July 2026                                                                        |
| <b>Inspector</b>                | Joe Bonner                                                                                          |

## **1.0 Introduction**

- 1.1. The Commission received a request on the 5<sup>th</sup> of June 2026, on behalf of Cultaca Limited, to enter into pre-application consultation under Section 37B of the Planning and Development Act 2000, as amended, (the Act) in relation to the proposed development of an Open Cycle Gas turbine (OCGT) electricity generating plant with a gross electrical output of up to 385MW (Megawatts) and associated buildings, plant, site works, services and all ancillary development works on lands at the Roadstone Barrigone Quarry, Askeaton, Co Limerick.
- 1.2. The prospective applicant sought closure of the pre application consultation in correspondence dated the 21<sup>st</sup> of July 2026.

## **2.0 Site Location and Description**

- 2.1.1. The subject site is located c4.2km west of Askeaton, 4km southwest of Foynes and c1.5km southwest of the Aughinish Alumina site, with the latter two bordering the Shannon estuary. The quarry is described as 'the 'existing Barrigone Quarry site at the Roadstone Barrigone Quarry', to differentiate it from other Roadstone quarries operating in the wider area.
- 2.1.2. The site is c4ha in area, is irregular in shape and is accessed directly from the southern side of the N69 Limerick to Tralee National Secondary Road. It includes the existing quarry access road that rises uphill for a distance of c220m, to where the site includes the excavated quarry, stockpiles of stone and a settlement pond. The unexcavated western side of the quarry site has been cleared of vegetation, and accommodates an administrative office, welfare facilities, a haul route, weighbridge, wheel wash / dust suppression system and a number of conveyors and crushers. The main body of the site extends c390m from north-west to south-east and at its widest point, extends c250m east to west.
- 2.1.3. The site access road is located within the boundary of the Barrigone SAC (Site Code: IE0000432) and Barrigone pNHA (Site Code: IE0000432), while the SAC also abuts the northern, eastern and southern site boundaries and is generally marked by tree cover associated with the Barrigone SAC, while the wider area generally consists of agricultural fields.

- 2.1.4. The Glenbane West Stream runs in a westerly direction, c320m north of the entrance to the site, before turning south and flowing into the Lower River Shannon SAC, the River Fergus Estuaries SPA and the Inner Shannon Estuary – South Shore pNHA, c950m to the southwest.
- 2.1.5. The prospective applicant's presentation to the pre application consultation meeting stated that the closest site of archaeological interest – a Ringfort-Rath (NIAH Ref. LI010-089) is located approximately 10m to the south of the site. However, based on mapping on [www.archaeology.ie](http://www.archaeology.ie), it appears to be located within the area already excavated. There are six other ringfort-raths recorded between 100m and c350m of the site boundary.
- 2.1.6. The Limerick-Foynes rail line lies c110m north of the site entrance, while the new Foynes to Limerick Road lies c1.04km south of the sites southern boundary. The closest residential property to the proposed emissions stack is located c500m to the southwest, while several houses are located directly opposite to the site entrance and c550m north of the proposed stack.

### **3.0 Description of Proposed Development**

- 3.1. The proposed development would comprise an Open Cycle Gas Turbine (OCGT) electricity-generating plant with a gross electrical output of up to 385 megawatts (MW). The key elements of the proposed development are:

- Gas turbine generator (OCGT) unit with associated enclosures, air intake, exhaust diffuser and CEMS-equipped stack 30m in height and emissions monitoring unit;
- Single storey control building, including admin and workshop facilities;
- Single storey electrical common building;
- 3 no. above ground tanks (2 no. fuel tanks each 4,500m<sup>3</sup> and 1 no. firefighting water tank at 4,000m<sup>3</sup>)
- Compressor and firefighting pumps building and a propane tank.

The proposed Above Ground Installation (AGI) Enclosure would house the following:

- Single storey gas analyser kiosk.

- Single storey boiler house kiosk.
- Single storey ancillary pressure reduction kiosk.
- Single storey electrical and instrumentation kiosk.

3.1.1. While the indicative site layout plan shows an onsite 220kv electricity substation, as well as indicative grid connection routes and the location of the existing gas main, these elements of the overall development would not form part of the proposed application, and would form part of separate applications for consent.

## 4.0 Planning History

### 4.1. Subject Site

4.1.1. The following planning history refers to the proposed site. See section 3.1 of the 'Preliminary Planning Statement' for further planning history details.

- **LCC Reg. Ref. 2560020** – Permission was GRANTED on the 6<sup>th</sup> of November 2025 to Roadstone Limited on a site of 17.44ha for a development including 'The infilling and restoration of the existing quarry void over an area (c. 4.1 ha) of existing permitted quarry (05/7029 and ABP 13.QC.2098) using approximately 450,000m<sup>3</sup> or 810,000 tonnes of inert soil and stone waste or soil and stone by-product'.
- **LCC Reg. Ref. 22294** – Permission was REFUSED on the 9<sup>th</sup> of May 2024 to Roadstone Limited on a site of 17.44ha for a development including restoration and infilling of the existing and future void over an area of (c. 17.2 ha) of the existing Barrigone quarry. The refusal reason related to the proposed entrance and roadside boundary works being located within the Barrigone SAC (site code 000432).
- Earlier permissions from the 1980's and 1990's authorised a sand drying plant, asphalt plant and erection of a lime kiln, while the quarry was permitted to continue operating following a Section 261 decision in 2008 under ABP 13.QC.2098 (LCC 05/7029).

### 4.2. Precedent Decisions

4.2.1. Table 4.1 below lists a number of recent decisions issued by the Commission, relating to section 37B pre-application consultations of a similar nature being considered in this case. The Table also confirms whether or not the Commission determined that these proposals conform with the statutory definition of SID.

**Table 4.1 Precedent Decisions**

| <b>No.</b> | <b>ACP Ref. No.</b> | <b>Development Description and Location</b>                                                                                                                                                                                                                        | <b>Decision Date</b> | <b>Decision</b> |
|------------|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-----------------|
| 1          | 320975-24           | 300MW Open Cycle Gas Turbine plant, primarily fuelled by Natural Gas and ancillary development, including a 220kV Substation and 220kV connection from the substation to the existing Cashla 220kV Substation at Rathmorrissy / Polinagroagh, Athenry, Co. Galway. | 19/08/2025           | Is a SID        |
| 2          | 320566-24           | 600MW gas-fired generation station at Kilshane Road, Finglas, Dublin 11                                                                                                                                                                                            | 25/09/2024           | Is a SID        |
| 3          | 319073-24           | 1,125MW Reserve gas-fired power generator, GIS electrical substation, energy-storage system (ESS) and associated site development work in five townlands in Portumna, County Galway.                                                                               | 08/05/2024           | Is a SID        |
| 4          | 316229-23           | 350MW Low Carbon OCGT fuelled by hydrotreated vegetable oil, administration building and workshop, and ancillary plant and infrastructure at Tarbert Power Station, Tarbert, Co. Kerry.                                                                            | 12/10/2023           | Is a SID        |
| 5          | 315916-23           | Power plant comprising of a Combined Cycle Gas Turbine (CCGT) (570MW) unit and an Open Cycle Gas Turbine (OCGT) (140MW) unit on land within the Derrygreenagh Bog group, Co. Offaly.                                                                               | 04/07/2023           | Is a SID        |
| 6          | 315479-23           | Proposed construction of a new Gas Turbine Generation Station with an output of up to 293MW on lands at Luddenmore, Luddenbeg & Inch St Laurence South townlands, Ballyneety, Co. Limerick                                                                         | 08/05/2023           | Is not SID      |

|   |           |                                                                                                                        |            |            |
|---|-----------|------------------------------------------------------------------------------------------------------------------------|------------|------------|
| 7 | 314365-23 | 299MW OCGT facility and associated grid connections at Poolbeg Generating Station, Pigeon House Road, Dublin 4         | 24/01/2023 | Is not SID |
| 8 | 314003-23 | OCGT plant and ancillary connection infrastructure with an output of up to 299MW at Aghada ESB Power Station, Co. Cork | 25/08/2022 | Is not SID |

## 5.0 Prospective Applicant's Case / Consultation Meeting

### Documents submitted / prospective applicant's case

- 5.1. As part of the consultation request, the Prospective Applicant's submitted a detailed 'Preliminary Planning Statement', an 'Engineering Preliminary Report' and a number of plans showing the site location and a proposed site layout, to the Commission. The matters addressed in the two reports can be summarised as follows:

#### Preliminary Planning Statement

1) Subject Site; 2) Relevant Planning History and Related Developments; 3) Planning Policy Context; 4) Proposed Development; 5) Opinion of SID.

#### Engineering Preliminary Report

1) Existing Information; 2) Proposed Surveys; 3) Drainage; 4) Traffic; 5) Ecological and Environmental Assessments; 6) Structure; 7) Electrical Connection; 8) Gas; 9) Engineering Outputs.

- 5.2. In their submission, the prospective applicant stated that they are of the opinion that the proposed development would constitute 'Strategic Infrastructure Development' (SID) under Section 37A of the Planning and Development Act 2000, as amended, as it surpasses the following threshold set out in the seventh schedule to the Act.

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

- 5.3. The prospective applicant also considers that the proposed development is of strategic importance by reference to the requirements of Section 37A(2)(a), and 37A(2)(b), of the Planning and Development Act 2000, as amended, and as a result

would meet the legislative requirements, and an application must therefore be made directly to the Commission under Section 37E of the Act.

#### Consultation Meeting

5.4. A single virtual pre-application consultation meeting was held on the 14<sup>th</sup> of July 2026. The meeting record and the presentation made by the prospective applicant to the Commission's representatives are attached to the file. The prospective applicant's presentation included a revised site layout, but the principle of the development was the same as set out in the original meeting request. The main points discussed were:

- The prospective applicant clarified that ongoing site and ecological surveys, and advice regarding air quality and landscape will inform the optimal site layout designs.
- The grid and gas connection routes will not form part of the application but will be considered as part of the application and EIAR.
- Careful consideration needs to be given to the description of the baseline, if quarrying continues on the adjacent lands, during the application process.
- Air dispersion modelling is ongoing and the proposed stack height is currently 30 metres relevant to existing quarry levels, and will be accounted for in an air impact assessment and the air quality and the impacts on human health chapters in the EIAR.
- Fissures in the limestone rock need to be considered in the water chapter and biodiversity chapters.
- Bird surveys should include winter bird surveys.
- The most up to date policy documents should be referenced.
- A detailed greenhouse gas emissions assessment should be included.
- The prospective applicant indicated that surface water would be controlled by swales while the gas power plant would be a dry operation with little or no water arising from the development.
- The prospective applicant stated that the only excavation that would occur would be for the foundations.

- The Commission's representative advised the prospective applicant to consult with the EPA and HAS, while have already communicated with Limerick City and County Council and the National Parks and Wildlife Service and landowners.
- The EIAR should incorporate the operational factors of the quarry site and assess the risk in the Risk of Major Accidents and Disasters chapter for both to co-exist safely.
- The prospective applicant believes the quantity of distillate that would be stored on site, to service the project, is below the threshold necessary to classify as a COMAH site and require input from the HAS.
- The Commission's representatives recommended extracting information from the Water Framework Directive assessment to be used in a screening exercise or use as a separate document to the EIAR water chapter
- The Commission's representatives advised conducting bat surveys, to determine if a Derogation License is needed.
- The prospective applicant clarified that they would not be planting trees in the SAC and instead they would plant within the buffer areas between the SAC boundary and the red line boundary.
- The prospective applicant restated their opinion that the proposed development constituted 'Strategic Infrastructure Development' (SID) under Section 37A of the Act.
- The Commission's representatives advised that they were of the preliminary view that the proposed development would constitute SID; however, the final decision lies with the Commission.

## **6.0 Legislative Provisions**

### **6.1. Planning and Development Act 2000 (as amended)**

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

- (a) any proposed development in respect of which a notice has been served under section 37B(4)(a),

6.1.2. Section 37A of the Act states:

- (1) ...An application for permission for any development specified in the Seventh Schedule ... shall, if the following condition is satisfied, be made to the Commission under section 37E and not to a planning authority.
- (2) That condition is that, following consultations under section 37B, the Commission serves on the prospective applicant a notice in writing under that section stating that, in the opinion of the Commission, 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.

6.1.3. Section 37B of the Act states:

- (4) Where, following consultations under this section, the Commission is of the opinion that the proposed development would, if carried out—
  - (a) fall within one or more of paragraphs (a) to (c) of section 37A(2), it shall serve a notice in writing on the prospective applicant stating that it is of that opinion, or
  - (b) not fall within any of those paragraphs, it shall serve a notice in writing on the prospective applicant stating that it is of that opinion.

6.1.4. The seventh schedule to the Act includes the following 'Infrastructure Development' under the heading of "Energy Infrastructure", for the purposes of Section 37A and 37B

1 Development comprising of or for the purposes of any of the following

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

## **6.2. Environmental Impact Assessment**

6.2.1. Section 37E(1) of the Planning and Development Act, 2000, as amended requires that an application for permission for development in respect of which a notice has been served under section 37B(4)(a) shall be made to the Commission and shall be accompanied by an environmental impact assessment report in respect of the proposed development. Therefore, should the Commission determine that the proposed development constitutes a Seventh Schedule strategic infrastructure development, the submission of an EIAR would be mandatory.

## **6.3. Appropriate Assessment**

6.3.1. The existing quarry access road, which would also act as the access road to the proposed development, is located within the boundary of the Barrigone SAC (Site Code: IE0000432), while the SAC also abuts the northern, eastern and southern site boundaries. The prospective applicant stated that an AA Screening Report and Natura Impact Statement will accompany the planning application.

## **7.0 Assessment**

### **7.1. Section 37A(1) – is the proposed development specified in the seventh Schedule of the Planning and Development Act 2000, as amended?**

7.1.1. Section 5.0 of the 'Preliminary Planning Statement' described the main components of the proposed development to include a Gas turbine generator (OCGT) unit with associated enclosures, air intake, exhaust diffuser and CEMS-equipped stack; emissions abatement. The fuel source is to be primarily natural gas, backed up with diesel. The OCGT process is illustrated at slide 17 of the presentation to the consultation meeting.

7.1.2. An OCGT draws in fresh air, where it is compressed, before entering a combustion chamber, where it is mixed with the fuel source and is ignited. The effect of combustion is the heating of gases to a high temperature that triggers the spinning of the turbine, which in turn drives a generator, converting mechanical energy into

electrical energy. The prospective applicant has stated that the electrical output of the process would be up to 385MW.

7.1.3. Having reviewed the information submitted with the consultation request and presented as part of the consultation meeting, I am satisfied that the proposed development would be consistent with a development description of 'combustion installation with a total energy output of 300MW. For that reason, I am also satisfied that the proposed development would be consistent with the description of 'energy infrastructure' set out in the Seventh Schedule to the Planning and Development Act 2000, as amended, namely 'A thermal power station or other combustion installation with a total energy output of 300 megawatts or more'.

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

7.2.1. In addition to the conclusion set out in section 7.1.3 above, the proposed development must also comply with at least one of the three criteria in Section 37A(2)(a), (b) or (c) of the Planning and Development Act 2000, as amended.

**7.3. 37A (2) (a) - The development would be of strategic economic or social importance to the State or the region in which it would be situate.**

7.3.1. At section 6.2 of their Preliminary Planning Statement, the prospective applicant stated that the proposed development is considered to be of strategic importance by reference to the requirements of Section 37A(2)(a), while section 4 of the same statement sets out a planning policy basis in support of their opinion, which I will reference in the following paragraphs.

7.3.2. The White Paper - Ireland's Transition to a Low Carbon Energy 2015-2030 stated that gas will contribute to security of energy supply through Ireland's period of transition towards hitting the 2050 GHG reduction target of 80% and 95%, compared to 1990 levels.

7.3.3. The Government Policy Statement on Security of Electricity Supply (November 2021) recognised that ensuring security of electricity supply continues to be a national priority as the electricity system decarbonises towards net zero emissions by 2050 and that there is a need for very significant investment in additional flexible conventional electricity generation, electricity grid infrastructure,...in order to ensure

security of electricity supply. It also deemed it appropriate that additional electricity and gas transmission and distribution grid infrastructure be permitted and developed, in order to support security of electricity supply.

- 7.3.4. Action 8 of Energy Security in Ireland to 2030, Energy Security Package (November 2023) seeks the procurement of at least 2GW of new, flexible, enduring, capacity through market mechanisms, while its conclusion states that plans for an electricity system, focused on additional renewable generation, demand side flexibility, new gas-fired generation as back-up,... are the right ones to secure electricity supplies. Action 12 seeks to accelerate delivery of power system flexibility and Action 18 aims to strengthen the supply chain of secondary fuels for gas-fired power generation.
- 7.3.5. A key target in Table 3.1 of chapter 12 'Electricity' of Climate Action Plan 2024 (CAP 2024) (20<sup>th</sup> of December 2023), is to include the delivery of at least 2 GW of 'New Flexible Gas Plant by 2030 in tandem with up to 80% of electricity being met by renewable energy, while phasing out and ending the use of coal, oil and peat in electricity generation.
- 7.3.6. Ireland's Long-term Strategy on Greenhouse Gas Emissions Reduction 2024 (Climate Action Strategy) states that the carbon intensity of Ireland's electricity has reduced largely due to increased renewable electricity generation and the use of higher-efficiency natural gas turbines. This document acts as a link between shorter-term Climate Action Plans and Carbon Budgets and the longer-term objective of the European Climate Law and Ireland's National Climate Objective.
- 7.3.7. The National Energy & Climate Plan 2021-2030 (NECP) (July 2024) acknowledged gas is crucial in projects needed for energy security, that are consistent with national and EU climate policy objectives, within an increasing renewable electricity system based on wind and solar. It also notes that the CRU-led Security of Supply actions include 1) Procurement of at least 2 GW of new, flexible, enduring, capacity through market mechanisms.
- 7.3.8. The Climate Action Plan 2025 (15<sup>th</sup> of April 2025) notes that the key target of 2 GW of 'New Flexible Gas Plant' set out in CAP 2024 remains in place for 2030.
- 7.3.9. The Electricity and Gas Networks Climate Change Sectoral Adaptation Plan 2025 (18<sup>th</sup> of November 2025) considers national scale impacts and risks for the three EGN subsectors (electricity generation, electricity networks and gas networks). It

states that 'the complimentary partnership between flexible gas-fired power generation and intermittent renewable generation is critical to optimising Ireland's renewable energy production' and that 'this is likely to increase in importance as more renewables connect to the electricity grid and meet our target of 80% renewable electricity by 2030'. It also states that 'In response to this, the Government announced that an additional 2,000 megawatts (MW) of flexible gas-fired generation are to be built by 2030'.

7.3.10. As set out above in the policy context, I am satisfied that the proposed development consists of a form of development that has been identified at a national level to be of strategic economic and social importance to the State or the region in which it would be situate, thereby satisfy the requirements of Section 37A (2) (a) of the Planning and Development Act 2000, as amended.

**7.4. 37A (2) (b) - The Development would contribute substantially to the fulfilment of any of the objectives in the NPF or in the RSES in force in respect of the area or areas in which it would be situate.**

7.4.1. In order to meet the provisions set out in section 37A (2) (b) of the Planning and Development Act 2000 as amended, the proposed development would need to contribute substantially to the fulfilment of any of the objectives in the National Planning Framework (NPF) or the Regional Spatial and Economic Strategy for the southern region.

#### **National Planning Framework**

7.4.2. Section 4.2 of the prospective applicant's 'Preliminary Planning Statement' specifically references NPO's 30, 70 and 75, which I will address below, along with several other objectives.

#### **7.4.3. National Policy Objective 30**

National Policy Objective 30 seeks to 'Facilitate the development of the rural economy, in a manner consistent with the national climate objective, through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities, while

at the same time noting the importance of maintaining and protecting biodiversity and the natural landscape and built heritage which are vital to rural tourism'

#### Comment

The proposed development would facilitate the development of both the rural and urban economy by facilitating security of energy supply.

The National Climate Objective was introduced as an amendment to Section 3 of the Climate Action and Low Carbon Development Act 2015 (as amended) in 2021 and states that 'The State shall, so as to reduce the extent of further global warming, to pursue and achieve, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy'. This will be achieved through a) carbon budgets; b) a sectoral emissions ceiling; c) climate action plans; d) a national long term climate action strategy; and e) a national adaptation framework.

As noted in section 7.3 above, the Climate Action Plans 2024 and 2025 include the delivery of at least 2 GW of 'New Flexible Gas Plant by 2030 in tandem with up to 80% of electricity being met by renewable energy. I am satisfied that the proposed development would be consistent with the national climate objective.

The next element to consider is whether or not the proposed development would support sustainable and economically efficient energy industries. I am satisfied that the proposed development, would act as backup or 'flexible' generation during critical periods, when renewable energy sources are not sufficient to meet demand, thereby supporting a sustainable energy industry. While gas and possibly oil, on which the proposed development would operate, are more expensive forms of fuel for electricity generation than are wind and solar, the proposed development is designed as a back-up and flexible sources of energy to wind and solar. Therefore, I am satisfied that the proposed development would support an economically efficient energy industry.

The final aspect of NPO 30 to be considered is whether or not the proposed development notes 'the importance of maintaining and protecting biodiversity and the natural landscape and built heritage'. On the basis of the information provided in the original submission and in the presentation made to the pre-application consultation

meeting, I am satisfied that the prospective applicant has considered the protection of biodiversity, the natural landscape and built heritage.

I am satisfied that the proposed development would contribute substantially to the fulfilment of National Policy objective 30 of the National Planning Framework (NPF).

#### **7.4.4. National Policy Objective 67**

National Policy Objective 67 seeks to 'Support the circular and bio economy including in particular through greater efficiency in land and materials management, promoting the sustainable re-use and refurbishment of existing buildings and structures while conserving cultural and natural heritage, the greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development'.

##### **Comment**

The proposed development would be carried out in the cavern left by the excavation of a quarry, which demonstrates an efficient use of land, which is also a sustainable re-use of a structure, the definition of which includes 'any excavation' as per Section 2 of the Planning and Development Act 2000.

On the basis of the information provided in the original submission and in the presentation made to the pre-application consultation meeting, I am satisfied that the prospective applicant will seek to conserve cultural and natural heritage as part of the development.

As set out earlier, the proposed development would also facilitate the connection of additional renewable energy into the national electricity network and would reduce the rate of land needed for new development, by utilising an existing quarry void and access road.

I am satisfied that the proposed development would contribute substantially to the fulfilment of National Policy objective 67 of the National Planning Framework (NPF).

#### **7.4.5. National Policy Objective 70**

National Policy Objective 70 seeks to 'Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050.

### Comment

While there is clear link between the use of back up / flexible gas plants as a support mechanism for the delivery of additional renewable energy around the country, I am not satisfied that the proposed development could be deemed to be promoting renewable energy use and generation at appropriate locations. I am not satisfied that the proposed development would contribute substantially to the fulfilment of objective 70 of the NPF.

#### 7.4.6. National Policy Objective 75

National Policy Objective 75 states that 'Local Authorities shall plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant Regional Spatial and Economic Strategy, through their City and County Development Plans'.

### Comment

This objective refers to actions that must be taken by local authorities and not to individual planning application. For that reason, I am not satisfied that the proposed development is capable of contributing in any respect to the fulfilment of objective 75 of the NPF.

### **Regional Spatial and Economic Strategy**

7.4.7. Section 4.2.2 of the prospective applicant's 'Preliminary Planning Statement' specifically references Regional Policy Objectives RPO's 50, 56(e), 89, 96 and 225 and 75, being of relevance to the proposed development. I will address them below.

#### 7.4.8. Regional Policy Objective 50

RPO 50 'Diversification' states that 'It is an objective to further develop a diverse base of smart economic specialisms across the rural Region, including...renewable energy.

### Comment

The objective references renewable energy and while the proposed development is not in itself renewable energy, it would provide up to 385MW of back up energy necessary to allow the development of additional renewable energy in the region, thereby contributing substantially to the fulfilment of objectives 50 of the RSES. I am

satisfied that the proposed development would contribute substantially to the fulfilment of objective 50 of the RSES.

7.4.9. Regional Policy Objective 56(e)

RPO 56 'Low Carbon Economy' states that 'It is an objective to support investments in energy efficiency of existing commercial and public building stock'

Comment

I am not satisfied that the proposed development would contribute substantially to the fulfilment of objective 56(e) of the RSES, as it relates to energy efficiency in buildings.

7.4.10. Regional Policy Objective 89

RPO 89 'Building Resilience to Climate Change' states that 'It is an objective to support measures to build resilience to climate change throughout the Region to address impact reduction, adaptive capacity, awareness raising, providing for nature-based solutions and emergency planning;

Comment

The proposed Open Cycle Gas Turbine would be a measure that would support both 'adaptive capacity' and 'emergency planning' as it would provide a back-up and flexible form of energy supply at times when renewable energy is unavailable due to a lack of wind or sunlight/daylight to power windfarms and solar farms, which are themselves critical to the building resilience to climate change. I am satisfied that the proposed development would contribute substantially to the fulfilment of objective 89 of the RSES as it relates to build resilience to climate change.

7.4.11. Regional Policy Objective 96

RPO 96 'Integrating Renewable Energy Sources' states that 'It is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate renewable energy sources and ensure our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows'.

Comment

While the overall project would include a connection to the national gas network, which lies c700m from the site entrance and would also include a connection from the site to the national electricity grid, both connections are for the purpose of serving the proposed development and would not form part of the proposed development, notwithstanding being considered and assessed as part of the EIAR. In addition, while the proposed development would facilitate the development of renewable energy sources, it is not in itself a renewable energy development. I am not satisfied that the proposed development would contribute substantially to the fulfilment of objectives 96 of the RSES, as it relates to energy efficiency in buildings.

7.4.12. Regional Policy Objective 225

RPO 225 'Gas Network' states that:

Subject to appropriate environmental assessment and the planning process where required, it is an objective to:

- a. Promote renewable gas leading to carbon emission reduction in agriculture, industry, heating and transport as well as sustainable local employment opportunities.
- b. Support the transition of the gas network to a "carbon neutral" gas network by 2050, which will drive Ireland and the Region to becoming a low carbon society.
- c. Support investment in the sustainable development of agricultural biogas sector and regional gas supply projects which strengthen gas networks in the Region and assist integration of renewable gas to the grid network.
- d. Support investment in developing renewable gas and provision of CNG refuelling infrastructure which will help reduce the Green House Gas emissions in both the agriculture and transport sectors and support Carbon Capture and Storage initiatives, which has the potential to decarbonise power generation at scale
- e. Strengthen the gas network sustainably to service settlements and employment areas in the Region, support progress in developing the infrastructures to enable strategic energy projects in the Region. An example is the Tarbert/Ballylongford landbank in Co Kerry which is a strategic

development site under the Strategic Integrated Framework Plan for the Shannon Estuary and support for the extension of the Gas Network from Listowel into the Kerry Hub and Knowledge Tri-Angle settlements of Tralee, Killarney and Killorglin.

#### Comment

While the proposed development would be renewable gas ready, it is not promoting renewable gas. The proposed development would not support investment in the sustainable development of the agricultural biogas sector or regional gas supply projects. In addition, it would not support investment in developing renewable gas and provision of CNG refuelling infrastructure and would not strengthen the gas network sustainably to service settlements and employment areas in the Region.

By reference to RPO 225(b), by being renewable gas ready, the proposed development would support the transition of the gas network to a “carbon neutral” gas network. However, I am not satisfied that the proposed development would contribute substantially to the fulfilment of objective 225 of the RSES

#### 7.4.13. Conclusion

Having considered relevant objectives and objectives cited by the prospective applicant, I am satisfied that the proposed development would contribute substantially to the fulfilment of National Policy objectives 30 and 67 in the National Planning Framework and Regional Policy Objectives 50 and 89 of the RSES in force in respect of the area or areas in which it would be situated, thereby satisfy the requirements of Section 37A (2) (a) of the Planning and Development Act 2000, as amended.

#### 7.5. **37A (2) (c) - The development would have a significant effect on the area of more than one planning authority.**

- 7.5.1. The prospective applicant did not indicate that they were of the opinion that the proposed development would satisfy the provisions of section 37A(2)(c) of the Planning and Development Act 2000 as amended, which requires the proposed development to have a significant effect on the area of more than one Planning Authority.

7.5.2. The presentation to the pre-application consultation meeting indicated the potential gas connection is available 700m from the site, while the three potential grid connection corridors extend for distances of between 5km and 7.422km from the site. All of the works necessary to provide the gas and grid connection options would be carried out entirely within county Limerick. While the benefits of the operational OCGT, being security of electricity supply, would extend beyond the administrative boundaries of Limerick City and County Council, I am satisfied that the proposed development would not have a significant effect on the area of more than one planning authority, and does not satisfy the provisions of section 37A(2)(c) of the Planning and Development Act 2000, as amended.

## **7.6. Conclusion**

7.6.1. Based on the above assessment, it can be concluded that the proposed development, with an energy output of up to 385MW, would exceed the threshold set out in the Seventh Schedule of the Planning and Development Act 2000, as amended, thereby, satisfying the requirements of section 37A(1) of the Act. It can also be concluded that the proposed development is of strategic importance by reference to the requirements of sections 37A(2)(a) and (b) of the Planning and Development Act 2000, as amended. Accordingly, I consider that the proposed development meets the legislative provisions for a strategic infrastructure development and an application would need to be made directly to the Commission.

7.6.1. I am also satisfied that the above assessment is consistent with the decisions issued by the Commission in respect of the precedent cases listed in table 4.1 above.

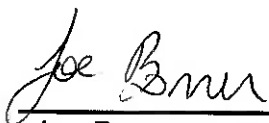
## **8.0 Recommendation**

8.1.1. I recommend that the Commission serve a notice on the prospective applicant, pursuant to section 37B(4) of the Planning and Development Act 2000, as amended, stating that they are 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 as set out below.

## 9.0 Reasons and Considerations

- 9.1.1. Having regard to the anticipated approximate energy output of the proposed OCGT at 385MW, 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 and Development Act 2000, as amended, namely 'A thermal power station or other combustion installation with a total energy output of 300MW or more', thereby satisfying the requirements set out in section 37A(1) of this Act.
- 9.1.2. 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 and Development Act 2000, as amended. An application for permission for the subject development would, therefore, need to be made directly to An Coimisiún Pleanála under section 37E of the Planning and Development Act 2000, as amended.

I confirm that this report represents my professional 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.



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Joe Bonner

Senior Planning Inspector

20<sup>th</sup> of August 2026

## **Appendices**

### **Appendix A. Relevant Bodies**

The following is a schedule of bodies considered relevant in this case for the purposes of Section 37E(3)(c) of the Act of 2000:

- Minister for Housing, Local Government and Heritage;
- Minister for the Environment, Climate and Communications;
- Limerick City and County Council;
- Commission for the Regulation of Utilities;
- Gas Networks Ireland
- Transport Infrastructure Ireland;
- The National Transport Authority;
- Southern Regional Assembly;
- Irish Aviation Authority;
- Iarnród Éireann
- Environmental Protection Agency;
- Health and Safety Authority;
- Office of Public Works;
- EirGrid;
- An Taisce;
- An Chomhairle Ealaíon;
- Fáilte Ireland;
- The Heritage Council;
- Uisce Éireann;
- Health Service Executive.

Further notifications should also be made, where deemed appropriate.