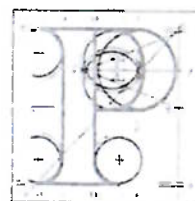


Our Case Number: ABP-318540-23



**An
Bord
Pleanála**

Envoirmmental Health Service
Yard 4
Promenade Road
Dublin 4
D03R9X3

Date: 08 February 2024

Re: 10 year planning permission for the proposed Open Cycle Gas Turbine (OCGT) power plant fuelled by Hydrotreated Vegetable Oil (HVO) and associated site works at Tarbert Island, Tarbert, Co. Kerry. (www.ssetarbertnextgen.com)

Dear Sir / Madam,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

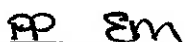
The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Ashling Doherty
Executive Officer
Direct Line: 01-8737160

PA09

| | | |
|--------------------|---------|--|
| Teil | Tel | (01) 858 8100 |
| Glao Áitiúil | LoCall | 1800 275 175 |
| Facs | Fax | (01) 872 2684 |
| Láithreán Gréasáin | Website | www.pleanala.ie |
| Ríomhphost | Email | bord@pleanala.ie |

| | |
|----------------------|-----------------------|
| 64 Sráid Maoilbhríde | 64 Marlborough Street |
| Baile Átha Cliath 1 | Dublin 1 |
| D01 V902 | D01 V902 |

Ashling Doherty

From: Marine
Sent: Friday 2 February 2024 11:40
To: SIDS
Subject: FW: HSE Submission on ABP Case Reference No. PC08.316229 Tarbert Power Station, Co. Kerry EHIS 3566
Attachments: HSE Submission Tarbert Power Station ABP Case Reference PC08.316229.pdf; HSE South Emergency Management Consultation Report EMENV 182.docx; ETHANE Aide Memoire 2.pdf

From: Bord <bord@pleanala.ie>
Sent: Wednesday, January 31, 2024 4:56 PM
To: Marine <marine@pleanala.ie>
Subject: FW: HSE Submission on ABP Case Reference No. PC08.316229 Tarbert Power Station, Co. Kerry EHIS 3566

From: Niall Roche [REDACTED]
Sent: Wednesday, January 31, 2024 4:02 PM
To: Bord <bord@pleanala.ie>
Subject: HSE Submission on ABP Case Reference No. PC08.316229 Tarbert Power Station, Co. Kerry EHIS 3566

Dear Sir/Madam,

Please find the HSE submissions with regard to the above proposed development

The first document is the HSE submission from the National Environmental Health Service
The second two documents are from HSE South Emergency Management – (a) HSE South Emergency Consultation Report and (b) ETHANE Aide Memoire

Please acknowledge receipt of these submissions at your earliest convenience,

Kind regards,

Niall Roche
Oifigeach Sláinte Comhshaoil - Environmental Health Officer
Timpeallacht/Athrú Aeráide, Aonad Tacaíochta Líonra - Environment/Climate Change, Network Support Unit (NSU)

Rannóg Sláinte um Phort Baile Átha Cliath, Seirbhís Sláinte Comhshaoil
Post Rialaithe Teorann - Clós 4, Bóthar an Phromanáid, Baile Átha Cliath 3, D03R9X3.

Dublin Port Health Section, Environmental Health Service
Border Control Post - Yard 4, Promenade Road, Dublin 3, D03R9X3.

T: [REDACTED] (office hours only) | E: [REDACTED]

Need information and advice on COVID-19? Go to www.hse.ie/coronavirus

"Tá an fhaisnéis sa ríomhphost seo (ceangaltáin san áireamh) faoi rún. Baineann sé leis an té ar seoladh chuige amháin agus tá sé ar intinn go bhfaighfidh siadsan amháin é agus gurb iadsan amháin a dhéanfaidh breithniú air. Más rud é nach tusa an duine ar leis é, tá cosc iomlán ar aon fhaisnéis atá ann, a úsáid, a chraobhscaoileadh, a scaipeadh, a nochtadh, a fhoilsiú, ná a chóipeáil. Seans gurb iad tuairimí pearsanta an údar atá san ríomhphost agus nach tuairimí FSS iad.

Má fuair tú an ríomhphost seo trí dhearmad, bheadh muid buíoch dá gcuirfeá in iúl don Deasc Seirbhíse ECT ar an nguthán ag +353 818 300300 nó ar an ríomhphost chuig service_desk@hse.ie agus ansin glan an ríomhphost seo ded' chóras."

"Information in this email (including attachments) is confidential. It is intended for receipt and consideration only by the intended recipient. If you are not an addressee or intended recipient, any use, dissemination, distribution, disclosure, publication or copying of information contained in this email is strictly prohibited. Opinions expressed in this email may be personal to the author and are not necessarily the opinions of the HSE.

If this email has been received by you in error we would be grateful if you could immediately notify the ICT Service Desk by telephone at +353 818 300300 or by email to service_desk@hse.ie and thereafter delete this e-mail from your system"



An tOifig Náisiúnta um Sláinte Chomhshaoil
Feidhmeannacht na Seirbhíse Sláinte,
Urlár 2, Teach na Darach, Ascaill na Teile
Páirc na Mílaoise, An Nás, Co. Chill Dara.

National Office for Environmental Health Services
2nd Floor, Oak House, Lime Tree Avenue
Millennium Park, Naas, Co. Kildare
Eircode: W91KDC2



An Bord Pleanála,
64 Marlborough Street,
Dublin 1
D01 V902
bord@pleanala.ie

Date: 31st January 2024

Name: An Bord Pleanála, 64 Marlborough Street, Dublin 1, D01 V902

Proposed development: Tarbert Power Station (HVO), Tarbert, Co. Kerry

Applicant: SSE Generation Ireland Ltd

EHIS Reference: EHIS 3566

ABP Case Reference No. PC08.316229

Dear Sir/Madam,

Please find enclosed the HSE Consultation Report in relation to the above proposal.

The following HSE departments were made aware of the consultation request for the proposed development on 29th November 2023

- HSE South Emergency Management – David O’Sullivan
- Estates – Helen Maher / Stephen Murphy
- Director of National Health Protection – Eamonn O’ Moore
- CHO – Michael Fitzgerald

If you have any queries regarding this report please contact Mr. John Moynihan, Principal Environmental Health Officer, Kerry in the first instance at [REDACTED]

Yours sincerely

Niall Roche

pp

John Moynihan
Principal Environmental Health Officer

HSE Submission Report

Environmental Health Service Consultation Report

(as a Statutory Consultee (Planning and Development Acts 2000) and Regulations made thereunder)

Date: 31st January 2024
Our reference: 3566
Report to: An Bord Pleanála
Type of consultation: Strategic Infrastructure Development
Applicant: SSE Generation Ireland Ltd
Address of proposed development: SSE Tarbert Power Station site, Tarbert, Co. Kerry
ABP Case Reference No. PC08.316229

Proposed development: The application is seeking permission to develop an "Open Cycle Gas Turbine (OCGT) power plant (350MW) fuelled by Hydrotreated Vegetable Oil (HVO) along with administration buildings and workshop, an ancillary plant, site works and services on land, grid connection and demolition of ancillary buildings associated with the existing Tarbert Heavy Fuel Oil (HFO) Power Station on land within the SSE Tarbert Site" (pg 1 of NTS).

The site is located in the townland of Tarbert Island bounded on three sides by the Shannon Estuary and to the south by the Temporary Emergency Generation (TEG) site and agricultural lands. The proposed development will be available to operate 24 hours per day 7 days per week but is expected to only be used as and when required and not exceeding 1,800 hours per annum.

To accommodate the development demolition works of ancillary buildings/structures and foundations associated with the existing Tarbert Heavy Fuel Oil (HFO) power station will be carried out. The HFO power station will be decommissioned prior to the construction phase of the proposed development.

Introduction

The local Environmental Health office in Kerry was consulted during the preparation of this report. Input was received from Mr. Brendan Dunne, Senior Environmental Health Officer.

The Environmental Health Consultation Report only comments on Environmental Health impacts of the proposed development as outlined in the EIAR and the adequacy of the EIAR from the Environmental Health viewpoint.

The Environmental Health Service has made observations and submissions on the following specific environmental health areas:

1. Assessment of the principle and description of the project

SSE Generation Ireland Ltd has applied to An Bord Pleanála for planning permission to redevelop within the boundaries of the existing SSE Tarbert Power Station Site. The proposed development entails the construction of an Open Cycle Gas Turbine (350 MW) plant fuelled by Hydrotreated Vegetable Oil (HVO) connected via an overhead cable 75 m in length to an existing substation to the south of the OCGT within the site boundary. To accommodate the proposed development demolition works of ancillary buildings and foundations associated with the existing Tarbert Heavy Fuel Oil (HFO) power station will be carried out.

The main objectives of the proposed development as indicated in the Non-Technical Summary are

- To support the security of electrical power supply
- To support the continued expansion of Ireland's renewable generation capacity and
- To provide support to national electricity grid at times when other electricity generation sources are not sufficient to meet demand.

The Environmental Health Service (EHS) is satisfied that the EIAR provides an adequate description of the proposed project.

2. Assessment of Public Consultation and the Non-Technical Summary (NTS)

The Non-Technical Summary (NTS) outlines under 6.3 the process of public consultation that has taken place, mostly in July 2023 that included online virtual consultation and in-person staffed exhibitions.

It was noted that the public had the opportunity to provide feedback through feedback forms. The issues raised in the feedback forms could not be found in either the NTS or the full EIAR under Chapter 6.

Reference is also made to a dedicated Community Liaison Officer but the period that person is allocated for could not be established.

The NEHS recommends that the dedicated Community Liaison Officer or other designated person remains in place throughout the construction, operations and decommissioning phases and act as a focal point for community feedback or complaints with regard to the proposed development. Issues of most relevance to population health include Noise, Air Quality including Dust, Traffic and Climate.

4. Assessment of Description of the Physical Environment

The site is described in the NTS as situated at SSE Tarbert, in the townland of Tarbert, Co. Kerry. The entire site is within the boundaries of Kerry County Council and is bordered to the north, east and west by the Shannon Estuary. It lies close (approx. 1km) from the Tarbert Ferry Terminal for the local Killimer to Tarbert car ferry. The site has a long history as a Power Station having been developed in the 1960s and in operation since 1969. At present a Temporary Emergency Generation (TEG) site to be made up of 3 no. Open Cycle Gas Turbines is currently under construction.

The development has three distinct phases

- Construction phase – 29 months

- Operational Phase – 25 years expected at least
- Decommissioning Phase – 1 year

The following addresses some of the issues of relevance to population health

Population and Human Health

Chapter 15 of the full EIAR describes the potential effects of the proposed development on population and human health indicating it draws upon the findings of other chapters notably

- Chapter 7 – Air Quality including Dust
- Chapter 10 – Landscape and Visual
- Chapter 11- Noise and Vibration
- Chapter 14 – Traffic and Transport
- Chapter 17 – Climate

The National Environmental Health Service (NEHS) suggests Chapter 18 Waste Management is added to the list of relevant chapters in context of population and human health.

The chapter examines the potential impact of the proposed development on population and human health in the construction and operational phases, with some reference also made to decommissioning. During construction, issues such as traffic, noise and vibration, air quality including dust and climate are covered including notification that a Construction Environmental Management Plan (CEMP) has been prepared. The potential effects during the Operational Phase are considered to be slight or not significant/neutral in the main.

The NEHS recommends the inclusion of waste management in the assessment of potential impacts on Population and Human Health. The management of waste on site is relevant to the control of potential vectors of disease including rodents, flies and potential invasive species of mosquito.

The NEHS recommends consideration is given to traffic related impacts during holiday periods when use of the Killimer – Tarbert ferry is likely to be at heightened capacity.

Noise and Vibration

Chapter 11 of the EIAR addresses the subject of Noise and Vibration during all phases of the development, construction, operations and decommissioning. A detailed assessment of vibration in both the construction and operational phases is scoped out of this chapter due to the distance to the nearest receptor. (pg 7 of Chapter 11). In both construction and operational phases noise sources are related to

- (a) Noise from on-site activities and
- (b) Noise from traffic on roads to and from the site.

Three Noise Sensitive Receptors (NSRs) are identified with NSR 1 located 245 m from the boundary wall, adjacent to the closest operational sound. It is noted that month 7 of the 29 month construction phase is stated to be the period when noise is at a maximum.

NSR 1 is indicated to be most affected during this period of the construction phase and also potentially during the operational phase. To mitigate noise a number of mitigation measures are set out under 11.6.1 for the construction phase and under 11.6.2 for the operational phase. A commitment to long-term periodic monitoring in line with licence conditions is also noted.

The NEHS recommends that the mitigations actions described under 11.6.1 and 11.6.2 are set as conditions of planning if permission is granted. Monitoring at NSR locations is recommended to take place at day, evening and night time periods to ensure compliance.

The NEHS recommends that there is a clear, accessible route for all sections of the local community to make complaints or provide feedback on noise and other health protection issues during each of the proposed development's phases.

Air Quality including Dust

Chapter 7 of the EIAR deals with the issue of Air Quality and potential impacts associated with all phases of the proposed development. The potential impacts per phase were outlined as follows:-

- (a) Construction Phase – dust and particulates from construction activities and traffic related emissions such as NO_x and Particulate Matter.
- (b) Operational Phase – combustion emissions associated with power generation – NO_x, Particulate Matter, Carbon Monoxide, Ammonia and Sulphur Dioxide.
- (c) Decommissioning Phase – similar to construction phase from dust and particulates.

The chapter goes on to describe the legislative and policy environment before outlining the methodology applied in assessing air quality issues in all phases, construction and operation in particular.

The conclusion drawn at the end of the chapter is that during construction there will be no significant effects on air quality. There is an assumption made that good standard practice in the mitigation of dust and other emissions within the Construction Environmental Management Plan (CEMP) will be applied.

The conclusion drawn with regard to the operational phase is that the proposed development will not have a significant effect on local air quality owing to the existing good air quality at in the vicinity of the site.

The NEHS recommends that dust control measures are implemented within the Construction Environmental Management Plan (CEMP) and those listed under 7.5.1.3 under Chapter 7 of the full EIAR are set as minimum conditions of planning if granted.

Climate Action and Opportunities for Health Gain

Chapter 17 of the EIAR addresses Climate from the perspective of both Mitigation and Adaptation.

The assessment of Green House Gas emissions considers all direct and indirect emissions associated with the proposed development over its lifetime during the 29 months of construction, minimum 25 years of expected operation and potential decommissioning. It should be noted that the impact of

climate change is widely regarded as the greatest threat to global health in the 21st century and has consequences far beyond the environmental consequences referred to.

The National Environmental Health Service (NEHSP) could not find a range of actions to be employed during the development to limit GHG emissions during each of the proposed development's phases.

In the context of adaptation and building resilience the chapter refers to a Climate Change Risk Assessment (CCRA) utilising a range of climate variables such as temperature increase and precipitation etc. The primary risk identified is related to the vulnerability of the proposed development to inundation from coastal flooding from the Shannon Estuary. Reference is also made to adaptation actions under the headings of Grey, Green and Soft Actions.

The NEHS could not find actions that promote resilience and create opportunities for health gain under this chapter beyond the key focus on flood defence.

In the context of Mitigation the NEHS recommends that the proposed development aim to minimise GHG emissions to the maximum extent feasible as every tonne of GHG emitted contributes to climate breakdown and has a profound effect on population health, globally as well locally. Examples of mitigation actions to consider include actions to support active travel for staff to and from the site, the utilisation of zero or near zero emission vehicles during all phases, the harvesting of rainwater, and the incorporation of renewable energy sources into the proposed development.

In the context of Adaptation the NEHS recommends that the proposed development go beyond the adaptation/resilience focus on flood defence and seek ways to develop health promotion opportunities. Reference is made to potential actions around creating shade to limit the urban heat island effect. Others may include cycle paths and walking paths to support active travel, sustainable drainage and waste management systems to limit opportunities for disease vectors to proliferate, and harvesting of rainwater to not only reduce demand on treated public water supplies (a mitigation action) but also as an adaptation address to heat/drought conditions.

Waste Management

Chapter 18 of the EIAR covers Waste Management and assesses effect in both the construction phase and operational phase. In the operational phase effects are assessed to be negligible.

The management of waste in the construction phase will be covered under the Construction Environmental Management Plan (CEMP).

The NEHS recommends a Pest/Vector control plan is incorporated into the design of the power station to limit opportunities during operations and into the CEMP during the construction phase. Pests/Vectors most likely to cause an issue are rodents, flies and possibly mosquitos.

Conclusions

Should permission be granted for the proposed development, the Environmental Health Service makes the following recommendations:

- The local community should have access to a feedback mechanism where feedback including complaints are received and acted upon by a designated person/role (Community Liaison Officer for example) within the proposed development for the entire period covering construction, operations and decommissioning.
- That waste management is assessed in terms of human health impact and that consideration is given to traffic movements during holiday periods when the Killimer – Tarbert ferry is likely to be most used.
- That the noise mitigations actions described under 11.6.1 and 11.6.2 are set as conditions of planning if permission is granted. Monitoring at NSR locations is recommended to take place at day, evening and night time periods to ensure compliance.
- That dust control measures are implemented within the Construction Environmental Management Plan (CEMP) and those listed under 7.5.1.3 under Chapter 7 of the full EIAR are set as minimum conditions of planning if granted.
- In the Mitigation of Climate Change every tonne of GHG emitted counts. The development should strive to reduce emissions at every opportunity in the use of renewable energy, low emission or zero emission transport, active travel promotion and water conservation etc.
- In Adapting/Building Resilience to Climate Change it is recommended the development assess vulnerability to sudden onset (e.g. flood) and slow onset (e.g. drought) risks and look for opportunities to promote health gain (e.g. green/blue spaces to provide shade and mental health co-benefits for staff and the local community).

Kind regards,

Niall Roche

Niall Roche

Oifigeach Sláinte Comhshaoil - Environmental Health Officer

Timpeallacht/Athrú Aeráide, Aonad Tacaíochta Líonra - Environment/Climate Change, Network Support Unit (NSU)



| HSE South Emergency Management Consultation Report | | | |
|--|---|-------------|------------------------------------|
| Report to | John Moynihan, PEHO, Kerry | Date | 11th Dec., 2023, |
| Type of consultation: EIS <input type="checkbox"/> Scoping <input type="checkbox"/> Screening <input type="checkbox"/> EIAR <input type="checkbox"/> EPA <input type="checkbox"/> | | | |
| Other (please specify): SID Strategic Infrastructure Development | | | |
| Authority | HSE /National Environmental Health /An Bord Pleanála | | |
| Reference Number | EHIS 3566 | | |
| EM Reference Number | EMENV 182 | | |
| Applicant | Gravis Planning for SSE Generation Ireland Limited | | |
| Proposal | Development of Open Cycle Gas turbine power plant powered by Hydrotreated Vegetable Oil with associated works on land within the existing SSE Tarbert Power Station, Tarbert, Co. Kerry. | | |

HSE South Emergency Management Observations:

Please be advised that the HSE South Emergency Management function does not have any specific observations to make with respect to this application. However, please note the following recommendations within the context of site operations:

1. Should an incident occur at the site and the site operator requires the assistance of the emergency services, the incident information should be provided in the 'ETHANE' format (please see attached).
2. Emergency Services access to the site should be clearly identified. This should be undertaken via appropriate high visibility signage, i.e.; a green sign with a yellow border and white lettering citing the abbreviation RVP
3. The site should have a mechanism in place to account for personnel during an evacuation in order to provide the responding emergency services with an estimate of the number of people accounted and unaccounted for.
4. The site should identify any critical / vulnerable facilities within the geographical catchment area, such as hospitals, schools, nursing homes, etc, that could be directly or indirectly affected by an incident at the site.
5. Where the 'off-site' impacts of an incident at the site affects a vulnerable cohort / population such as children within crèches, schools; patients / clients / residents within nursing homes, etc; the emergency services will require assistance from the site operator in determining the impact on the local community.
6. The site operator is encouraged to develop a business continuity plan that includes a plan for severe weather. For more advice on this, please see the Department of Business, Enterprise and Innovation, *Business Continuity Planning in Severe Weather*.
<https://dbei.gov.ie/en/Publications/Publication-files/Business-Continuity-Planning-in-Severe-Weather-Check-List-for-Businesses.pdf>

All correspondence or any queries with regard to this report should be forwarded to Ms. Maryanne Horgan, Emergency Management Office, HSE South, Eye, Ear and Throat Hospital, Western Road, Cork, T12 WP62 or maryanne.horgan@hse.ie



Seirbhís Sláinte
Níos Fearr
á Forbairt

Building a
Better Health
Service



**Dial 999 / 112 – Request the service you require: An Garda Síochána, Ambulance
Service and / or Fire and Rescue Service**

WHEN YOU ARE CONNECTED TO THE REQUISITE SERVICE(S)

GIVE THE FOLLOWING INFORMATION

This is: _____ Eircode _____
(Name, Telephone Number and Eircode Address of site)

An incident has occurred at this site - standby for ETHANE message

| | |
|----------|---|
| E | |
| | Exact location of the incident |
| T | |
| | Type of incident, e.g.; fire, explosion, gas leak, etc |
| H | |
| | Hazards – current and potential |
| A | |
| | Access and Egress – what is the safest approach route for responding emergency services and where is your emergency services meeting point (RVP) |
| N | |
| | Number of casualties and their condition – specify adult / children if known |
| E | |
| | The emergency services present and required |

**R.V.P.
No.1**

N.B. If you require another emergency service stay on the line and repeat the steps again