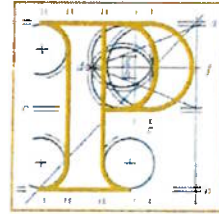


Our Case Number: ABP-319080-24



An
Bord
Pleanála

An Taisce
5 Foster Place
Dublin 2
D02 V0P9

Date: 08 April 2024

Re: Proposed transition and conversion of the existing 900MW electricity generating station from coal to heavy fuel oil and associated ancillary development at Moneypoint Generating Station, Moneypoint, Co. Clare. www.moneypointsecurityofsupply.ie
Moneypoint Generating Station, Moneypoint, Co. Clare.

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,


Lauren Murphy
Executive Officer
Direct Line: 01-8737275

PA09

Tel	Tel	(01) 858 8100
Glaao 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

Raymond Muwaniri

From: Bord
Sent: Monday 8 April 2024 09:09
To: Marine; Marine Observations
Subject: FW: SID Ref. 319080
Attachments: 20240405-ABP-319080.pdf

From: Sean O'Callaghan <socallaghan@antaisce.org>
Sent: Friday, April 5, 2024 5:29 PM
To: Bord <bord@pleanala.ie>
Subject: SID Ref. 319080

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

A Chara,

Please find enclosed An Taisce's submission on SID Moneypoint Ref. 319080.

Is mise le meas,

Seán O'Callaghan
Planning Officer
An Taisce – The National Trust for Ireland



An Taisce

The National Trust for Ireland

5 Foster Place

Dublin 2, Ireland

D02 V0P9

20240405-ABP-319080

64 Marlborough St,
Rotunda,
Dublin 1,
D01 V902.

Sent by email to: bord@pleanala.ie

5th April 2024

Ref: 319080

App: Electricity Supply Board (ESB)

For: Proposed transition and conversion of the existing 900MW electricity generating station from coal to heavy fuel oil and associated ancillary development.

1. Transition and conversion of the existing coal fired power station's primary fuel from coal to Heavy Fuel Oil (HFO) for limited hours of operation and a temporary period of five years until the 31 December 2029; 2. Construction of 2no. HFO tanks each with a capacity of 25,000 tonnes (approx. 48.7m diameter x 15m H) and associated bund walls (approx. 5.0m high); 3. Construction of a new boiler house (approx. 24m L x 18m W x 11m H) to house 2no. auxiliary boilers (1no. electric and 1no. distillate, each 22.7MW (thermal output), including: – 1no. Blow down vessel (approx. 4.5m wide x 13m high) – 1no. Exhaust Stack (approx. 1.0m diameter and 30m H) – 1no. Annex structure (approx. 10.0m L x 5m W x 4m H) 4. Construction of an extension to each of the existing 3no. Flue Gas Desulphurisation Absorbers (FGD) - units 1, 2 and 3, to provide additional reclaimed ash unloading facilities (ash injection plant extension), comprising: – 1no. conveyor enclosure (approx. 7.0m L x 2.5m W x 22m H) – 1no. hopper enclosure (approx. 6m L x 5m W x 6m H) 5. Construction of a reclaimed ash unloading facility at the existing landfill capping batching plant, comprising of a hopper enclosure adjoining the existing batching plant (approx. 14.0m L x 6.5m W x 6.0m H) and conveyor enclosure (approx. 3.5m L x 3.5m W x 11.5m H) 6. Dismantling and removal of 2no. mobile stacker reclaimers and 1no. coal conveyor bridge; 7. Changes to existing permitted Flue Gas Desulphurisation (FGD) by-product and ash storage area (ASA) arrangements (Pl. Ref. 14/373) to utilise spare capacity in the existing ASA [capping layer thickness increase from 0.6m (minimum) up to a maximum of 1.6 meters] with an overall proposed reduction in height of the currently permitted ASA by approx. 1.85m; and, 8. All associated ancillary site development works to facilitate the proposed development, including a new lighting arrangement, surface water drainage, internal roads and temporary construction compounds and laydown areas.

Site: Moneypoint Generating Station, Moneypoint, Co. Clare.

A Chara,

We thank you for referring the above application to An Taisce for comment.

An Taisce is a membership-based charity | Join us at www.antaisce.org/membership

An Taisce – The National Trust for Ireland | *Protecting Ireland's heritage, safeguarding its future*

Registered Office: Tailors' Hall, Back Lane, Dublin, D08 X2A3, Ireland | www.antaisce.org | +353 1 707 7076 | info@antaisce.org

Company Limited by Guarantee no. 12469 | Charity CHY4741 | Charity Regulator no. 20006358 | EU Transparency Register no. 473905437651-60

Directors: Stuart McCaul (Chair), Trish O'Connell (Vice Chair), Laura Segura Gutierrez (Hon Secretary), John Conroy (Treasurer)
Olivia Rogers, Rónán O'Brien, Finbarr Murray, Helen Shaw, Terri Morrissey, Sinead Mercier, Phil Doyle

Compliance with Carbon Budgets and Sectoral Emissions Ceiling

While we welcome the rapid phaseout of coal which is in evidence in this application, we submit that the Board assesses the alignment of the subject proposal with the first carbon budget of 295Mt (2021-2025), if operations are to change over to oil-fuelled generation by the end of 2025, and with the second carbon budget of 200Mt (2026-2030). This is particularly important given that the EPA 2023 Greenhouse Gas Emission Projections report states that Ireland's first two carbon budgets (2021-2025 and 2026-2030) are projected to be exceeded by a significant margin of between 24% and 34%.¹ This requires Ireland to take significant corrective action to put itself back on course for compliance with the carbon budgets, with the subject proposal having an important role to play in this as an emitter of greenhouse gases.

The Board should also account for the fact that the carbon budget for 2026-2030 will be reduced due to the projected exceedance of the first budget and the consequent shortening of the second carbon budget when this exceedance is carried over. The Climate Action and Low Carbon Development (Amendment) Act 2021 is very clear in its requirement that any overshoot of the first five-year budget (to the end of 2025) must be carried forward to reduce the following five-year budget for 2026-2030 (per s.6(D)(5) of the Climate Act). Therefore, the sectoral emission ceiling for electricity will be smaller than the current emission limit as set by the carbon budget programme of the Climate Change Advisory Council (CCAC). Therefore, it is imperative that the activity of Moneypoint Generating Station is aligned with a reduced second carbon budget (2026-2030).

Commitment to Generation Cessation

We submit that further clarification is needed as a preliminary matter on the commitment to a full cessation of oil-fuelled generation at the facility by December 2029. While it is stated throughout the application documents as an aim and target, it requires a firm commitment to ensure full clarity that there is no willingness to continue using the facility for oil-fuelled generation beyond 2029. Consequently, this would avoid a lock-in to fossil fuel as an energy source beyond 2030, which is critical for meeting international and national decarbonisation targets.

Water Framework Directive (WFD)

We note that the subject site is adjacent to the Lower Shannon Estuary which is designated as good water quality status under the WFD. In order to maintain the ecological integrity of this water body, we submit that the proposal should be assessed against **Article 4** of the WFD to determine whether the project may cause a deterioration of the status of a surface or ground water body or if it may jeopardise the attainment of good surface or ground water status or of good ecological potential and good surface or ground water chemical status.

Habitats and Birds Directive

We also submit that the subject proposal be assessed with regard to the potential for adverse impacts upon the River Shannon and River Fergus Estuaries SPA (site code: 004077) and the Lower River Shannon SAC (site code: 002165). We submit that particular regard is given to the proposed expansion of the ash storage area on the site which will facilitate an influx of ash and other by-products of the production process, given that it lies in close proximity to the aforementioned SAC/SPA site.

Please acknowledge our submission and advise us of any decision made.

Is mise le meas,

Seán O'Callaghan

Planning Officer

An Taisce – The National Trust for Ireland

¹ Ireland's Greenhouse Gas Emissions Projections 2022-2040. EPA. 2023. https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/EPA-GHG-Projections-2022-2040_Finalv2.pdf