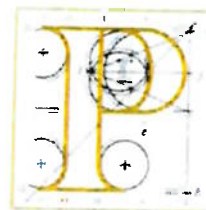


Our Case Number: ABP-319566-24



**An
Bord
Pleanála**

Emanuela Ferrari
4 Glen Road
Ennis
Co. Clare
V95 H9T0

Date: 19 June 2024

Re: The proposed development will comprise of a 600MW Powerplant, 120MW Battery Energy Storage System, Above Ground Installation and associated ancillary works.
Located within the townlands Kilcolgan Lower and Ralappane between Tarbert and Ballylongford Co.Kerry. (www.steppowerplant.com)

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

The Board will revert to you in due course with regard to the 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,

Ellen Moss
Executive Officer
Direct Line: 01-8737285

PA04

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64 Marlborough Street
Dublin 1
D01 V902



Emanuela Ferrari for FutureProof Clare CLG

4, Glenview Road

Ennis, Co. Clare

V95H9T0



To: An Bord Pleanála
64 Marlborough Street,
Dublin 1

17th June 2024

RE: FutureProof Clare Objection to application PA08.319566 by Shannon LNG Ltd for a 600MW Powerplant, 120MW Battery Energy Storage System, Above Ground Installation and associated ancillary works, located within the townlands Kilcolgan Lower and Ralappane between Tarbert and Ballylongford Co.Kerry.

A chara,

We refer to the above planning application and wish to object to its permission on the following grounds:

1. UNSUSTAINABILITY: The proposed development is part of an overall strategy for the Shannon Estuary that does not take into account the environmental stress to the area and transforms the Estuary into a sacrifice zone for unsustainable development in Ireland.

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The proposed development will form part of a plan for the Shannon Estuary as an industrial hub comprising of LNG import terminal and Data

Centres and export of gas (which would be US Fracked Gas) to the national transmission network via an expired 26 kilometre pipeline to Foynes in County Limerick.

We consider that no adequate and independent assessment of the strategic and cumulative environmental impacts of the large-scale development of the estuary – including data centres planned to increase exponentially in the country - as obliged under the SEA Directive, has been carried out.

The consent of a similar development in the area by An Bord Pleanála in 2023 (reference 311233), of an LNG import terminal on the same site, was already quashed by the High Court in November 2020 on the grounds that it would not be in accordance with the proper planning and sustainable development of the area.¹ We find inconceivable that a similar development is now under consideration, and that the planning legislation has not been updated to prevent similar unsustainable infrastructure in the long run.

2. INCOMPATIBLE WITH CLIMATE OBLIGATIONS: Plans for Shannon estuary as a strategic development zone according to government economic development plans are incompatible with climate obligations undertaken by the government under the Paris Agreements 2015.

Despite a moratorium on the importation of fracked gas as stated in the Programme for Government 2021 and the stated commitment not to develop LNG terminals and restrict the importation of fracked gas², and despite the preliminary conclusion of the Energy Security Review that a gas strategic storage facility which would only operate during periods in which there is a material risk of demand disruptions is a preferred mitigation option³, the proposed development suggests that a regular and abundant stream of gas imports will be required.

The Climate Action Plan 2024 commits Ireland to becoming a carbon-neutral economy by no later than 2050, and that the supply of gas should peak by 2030⁴. The proposed development, similarly to the previous quashed application will instead lock in the country into the use of gas for decades, contracting the State's commitment to carbon neutrality seriously. We consider that the proposed development feeds into a strategy of development based on the attraction of foreign investment in the form of data centres, an unsustainable, power hungry industry which is driving demand for fossil fuels globally. As the IPCC clearly states, the world governments need to wean their economies from the use of fossil fuels immediately to avert catastrophic climate change with unconceivable human, environmental and economic consequences. Even from the point of view of a strategy of capitalist development as undertaken by Ireland, the concentration of energetic resources into one industrial sector is short-sighted, unsustainable and extremely vulnerable to shocks.

We refer for example to An Bord Pleanála planning consent to the development of a data centre campus in Ennis (31447422) which is now being appealed by FpC and other objectors to the High Court and which is plainly linked to the need of unsustainable energy supply. The absurdity of the situation is also demonstrated by a recent article in the Irish Times stating that even IT giant Amazon is reconsidering their expansion in Ireland as the increase on energy capacity is in doubt⁵. This kind of economic strategy is a pie in the sky that not only is unachievable in the context of the current climatic and environmental crisis, but will also cause unspeakable damage to the Irish people, its economy and its environment in the attempt.

¹ [12-year legal battle quashes planning permission for Shannon LNG terminal - Friends of the Irish Environment](#)

² [gov - Policy Statement on the Importation of Fracked Gas \(www.gov.ie\)](#)

³ [Technical Analysis of the Security of Energy Supply of Ireland's Electricity and Natural Gas Systems Non-Technical Report \(www.gov.ie\)](#)

⁴ [gov - Climate Action Plan 2024 \(www.gov.ie\)](#)

⁵ [Amazon raises doubt over 'capacity to expand' in Republic due to limits on data centres - The Irish Times](#)

We therefore object in toto to the granting of an application to proceed in the development of the above mentioned infrastructure by Shannon LNG Ltd, on the basis of environmental and climatic considerations, and urge the Bord to adopt criteria for releasing planning permits in line with current climate obligations, and the reality of a world in crisis.

Thank you in advance for your consideration,

Is mise le meas,

Emanuela Ferrari for FutureProof Clare CLG