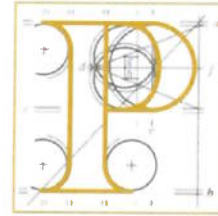


Our Case Number: ABP-319566-24



An
Bord
Pleanála

Friends of the Irish Environment
Kilcatherine
Eyeries
Co. Cork
P75 CX53

Date: 18 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

Tell	Tel	(01) 858 8100
Glaó 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



<https://www.friendsoftheirishenvironment.org/>

AN BORD PLEANÁLA	
OG- 072626-24	
BP-	
17 JUN 2024	
Fee: € 50	Type: cash
Time: 13.47	By: Hand

An Bord Pleanála
17 June 2024

By Kind Hand

Observation on planning application PA08.319566

Development of a 600MW Powerplant, 120MW Battery Energy Storage System, Above Ground Installation and associated ancillary works within the townlands Kilcolgan Lower and Ralappane between Tarbert and Ballylongford Co.Kerry

Parties: LNG Limited (Applicant)

Dear Officer;

As noted in the Board's refusal for the previous application for this proposed Shannon Technology and Energy Park [*'consisting of power plant, battery energy storage system, floating storage and regasification unit, jetty, onshore receiving facilities, above ground installation and all ancillary structures/works'* in ABP-311233-21], the objective for this area seeks *'to promote the sustainable development of these lands for marine related industries, utilizing the presence of deep water and the waterside location to harness the potential of this strategic location.* [Objective 1.2.13: *'Strategic Integrated Framework Plan for the Shannon Estuary'*.]

Described in that Board Order as a 'residue development' the power plant and battery energy storage system was ruled not to be consistent with this objective. This ground of refusal remains and should be sustained in the interest of orderly development, subject to any Judicial process.

The absence of assessment of alternative locations undermines the requirement of the EIA Directive which requires a 'description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics'. It also requires 'an explanation of 'the main reasons for the option chosen, taking into account the effects of the project on the environment.' [Article 5 1 (d)]

The developers' arguments that the power plant is part of 'overall masterplan' which includes an LNG import terminal, data centres, and supply of gas to the national transmission by a pipeline to Foynes is not sustained by any valid current planning applications or valid consents that we have been able to locate.

It is unclear in this application if the proposal will facilitate transport of gas to the site from the national gas network at Foynes rather than an LNG terminal to fuel the power station. The developer suggests that they intend to be 'their own customers' through the construction of a data centre but the sequence and interrelationship between the developments is not clear

The evolving law on Strategic Environmental Assessments and the shifting national policy on LNG terminals with the implications for fossil fuel lock-in (and the operation's impact on biodiversity) must be considered.

In climate terms, the Climate Action and Low Carbon Development (Amendment) Act 2021 to the 2015 Act requires the Board, in so far as practicable, to exercise its functions in a manner consistent with the national climate objective and the latest Climate Action Plan, which includes targets for renewable energy and emissions budgets.

Thus, consideration by the Board must be given to the recent Report by the EPA that 'Ireland is projected to achieve a reduction of 29 per cent in total Greenhouse Gas (GHG) emissions by 2030 compared to a target of 51 per cent.' [*'Greenhouse Gas Emission Projections 2023 to 2050'*, EPA, May 2024]. Consequently, renewable energy sources must be prioritised over fossil fuel-based power plants to achieve our climate targets.

Insufficient considerations of these issues are contained in the documentation provided to enable your decision. The precautionary principle refers. In the absence of clarity over these issues, we would urge the Board to refuse the application in its current form.

Yours, etc.

Tony Lowes

