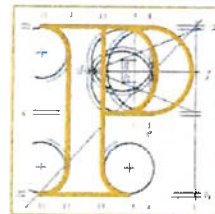


Our Case Number: ABP-319566-24



An
Bord
Pleanála

Martina O'Dea
Coisceim
Carron
Co. Clare

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.

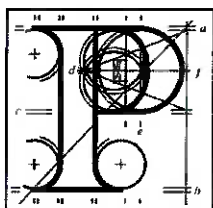
Yours faithfully,

Ellen Moss
Executive Officer
Direct Line: 01-8737285
PA04

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

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902



An
Bord
Pleanála

Observation on a Strategic Infrastructure Development Application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's name

Click or tap here to enter text.

Martina O'Dea

(b) Observer's postal address

Click or tap here to enter text.

Coisceim, Carron, Co.Clare

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's postal address

Click or tap here to enter text.

Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

☒

The agent at the postal address in Part 2

☐

Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Bord Pleanála case number for the current application (if available)**
(for example: 300000)

PA08.319566

- (b) **Name or description of proposed development**

Shannon LNG – 600MW Power Plant and 120MW battery Storage System_

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Kilcolgan Lower and Ralappana between Tarbert and Ballylongford, Co. Kerry

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is no word limit as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

I object to the Shannon LNG planning application – An Bord Pleanála Ref:319566 for a stand alone 600MW power plant 120MW battery storage system, above ground installation and associated ancillary works in Tarbert, Co. Kerry on the following grounds;

A stand alone power station by Shannon LNG on the same site was already refused development consent by An Bord Pleanála in 2023 (Ref: 311233) on the grounds that it would not be in accordance with the proper planning and sustainable development of the area. Nothing has changed that would give grounds to An Bord Pleanála to revisit its own decision.

This is essentially an appeal of a decision that is already being appealed in the High Court and would seem to be an abuse of process by the applicant by paying another hundred thousand euro to An Bord Pleanála to revisit its decision. The same privilege is not available to objectors to a development.

Shannon LNG's planning application form and the advertisement it posted in the papers for this proposed development state " The AGI will facilitate the import of natural gas to the national gas transmission network via the already consented 26km Shannon pipeline (ABP Reg Ref:PL08.GA0003 and PL08.DA003)" This indicates that the development proposes to send gas out to the national gas network and not to receive gas from the national gas transmission network via a pipeline. This is not what is proposed

5. Grounds

elsewhere in the planning document where it is stated that the pipeline “will facilitate transport of gas to the site from the national gas network at Foynes” and that low sulphur gas is proposed as the secondary fuel supply”

The original EIA for the Shannon LNG pipeline application in 2008 stated “The Shannon Pipeline is required to provide access to the Irish gas network for the Shannon LNG terminal. It will allow Shannon LNG to supply gas from additional diverse sources to the Irish market”. IF this applicant is proposing to use the pipeline gas rather than an LNG terminal to fuel the power station this would represent a change in direction of the gas flow on that pipeline, which has not been considered in the original EIA for the gas pipeline nor in this planning application. The original pipeline EIA is therefore outdated especially as there has been no assessment in the current EIA of the environmental impact of the importation of fracked gas by the applicant.

Shannon LNG claims it has planning permission for a 26km gas pipeline to the proposed development from Foynes but it seems that the pipeline consent (GA003) which was granted on February 17th, 2009 expired in 2019 at the latest. Planning permission expires after 5 years by default for applications lodged under Part 111 or Part XX1 of the Planning and Development Act 2000 as amended, if not otherwise mentioned in one of the conditions of a grant for development consent. The Pipeline application was lodged under section 182C of Part XI. However, condition 1 of the pipeline consent states that “ the development shall be carried out in accordance with the plans and particulars, including the Environmental Impact Statement, lodged with An Bord Pleanála on the 14th day of August 2008”. Condition 2 states that

5. Grounds

“ prior to the commencement of development, details of the phasing of the proposed development in conjunction with the construction of the permitted liquefied natural gas terminal at Ralappane and Kilcolgan Lower, County Kerry, shall be submitted to and agreed in writing with the relevant local authorities”. Condition 1 cannot be complied with because in its planning application lodged on 14th August 2008, Shannon LNG stated to An Bord Pleanala that it was only “ seeking planning permission for this development for a period of ten years”. Condition 2 cannot be complied with because planning permission for the LNG terminal is no longer permitted since development consent for the LNG terminal PA002 expired in 2018.

Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

Oral hearing request

8. If you wish to **request the Board to hold an oral hearing**, please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on **our website** or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

☐

No, I do not wish to request an oral hearing

☐

Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

For Office Use Only

FEM – Received		SIDS – Processed	
Initials		Initials	
Date		Date	

Notes