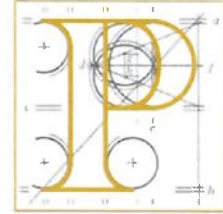


**Our Case Number:** ABP-319566-24



An  
Bord  
Pleanála

Office of Public Works  
Jonathan Swift Street  
Trim  
Co. Meath  
C15 NX36

**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](http://www.steppowerplant.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](http://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

PA09

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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

## Ellen Moss

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**From:** Roisin Walsh <Roisin.Walsh@opw.ie>  
**Sent:** 17 June 2024 15:20  
**To:** SIDS  
**Cc:** Rebecca Mullin  
**Subject:** OPW letter of observation An Bord Pleanála Case Reference 319566 Step Power Plant Co. Kerry  
**Attachments:** OPW letter of observation PA08.319566 Step Power Plant Co Kerry.pdf

**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 see attached the OPW letter of observation on the Step Power Plant, located within the townlands Kílcolgan Lower and Ralappane between Tarbert and Ballylongford Co. Kerry.

The An Bord Pleanála case reference number is 319566.

I would be grateful if you could acknowledge receipt of this email.

Kind regards

Róisín

---

**Roisin Walsh**  
*State/Principal Architect's Office*

---

**Oifig na nOibreacha Poiblí**  
Office of Public Works

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To send me files larger than 30MB, please use the link below <https://filetransfer.opw.ie/filedrop/Roisin.Walsh@opw.ie>

Email Disclaimer: <https://www.gov.ie/en/organisation-information/439daf-email-disclaimer/>

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**Roisin Walsh**  
*Clerical Officer - State/Principal Architect's Office*

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**Oifig na nOibreacha Poiblí**  
Office of Public Works

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Oifig na  
nOibreacha Poiblí  
Office of Public Works



“Case Reference ABP 08.319566”

Administrative Officer  
An Bord Pleanála  
64 Marlborough St.  
Dublin 1  
D01 V90

14<sup>th</sup> June 2024

**RE:** An Bord Pleanála Case Reference: PA08.319566

Direct Planning Application by Shannon LNG Limited to An Bord Pleanála for Planning Permission in Respect of a Strategic Infrastructure Development: Shannon Technology and Energy Park (STEP) Power Plant.

Submission from the Commissioners of Public Works in Ireland under Section 37E of the *Planning and Development Act 2000 (as amended)*.

A Chara,

## 1.0 INTRODUCTION

The Office of Public Works (OPW) is a central Government Office operating under the Minister for Public Expenditure, NDP Delivery and Reform with particular responsibility for Flood Risk and Estate Management, including Heritage. The Office of Public Works (OPW) has responsibility for the care, operation and maintenance of all National Monuments in State Care. Our principal objective is to protect, conserve, maintain and present these sites and to facilitate appropriate public access where possible. In this regard, OPW works in partnership with the National Monuments Service at the Department of Housing, Local Government and Heritage (DHLGH).

This submission outlines observations from the OPW on the direct planning application by Shannon LNG Limited to An Bord Pleanála for planning permission in respect of a strategic infrastructure development - Shannon Technology and Energy Park (STEP) Power Plant.

The Commissioners of Public Works in Ireland are listed as a prescribed authority for the purposes of Section 37E of the *Planning and Development Act 2000 (as amended)*.



## 2.0 SUBMISSION OVERVIEW

This direct planning application by Shannon LNG Limited to An Bord Pleanála for planning permission in respect of a strategic infrastructure development (SID) - Shannon Technology and Energy Park (STEP) Power Plant has been reviewed by the OPW. It is noted that this proposed SID has the potential to impact on the following buildings / properties.

## 3.0 SCATTERY ISLAND, KILRUSH, CO. CLARE

Record of Monuments and Places (RMP) - CL067-024001-  
National Monument Number – 10

Scattery Island was acquired by the State in 1991 and is now a National Monument in state care. The OPW is responsible for the care, maintenance and operation of the island, and the buildings and structures therein. The OPW has undertaken several phases of work to repair the churches and houses on the island, and more recently have restored the island's Street which was once home to the Scattery pilots and the post office. As regards the impact of the SID (Shannon Technology and Energy Park (STEP) Power Plant) on the built heritage of Scattery Island, the OPW has no particular issue to raise. However, there are concerns about the impact of this SID on the natural heritage of the island.

**Designations** – Scattery Island is designated as a Special Area of Conservation (Lower River Shannon SAC 2165), and part of the island is classified as a Special Protection Area (River Shannon and River Fergus Estuaries SPA 4077). Scattery Island is an important site for both breeding (nesting) birds and wintering birds. During the spring and summer season, the following birds have been observed breeding on the island: Kestrel, Raven, Chough, Shelduck, Ringed Plover and Oystercatcher. Passerines such as Meadow Pipit, Skylark, Wren, Stonechat, Blackbird and Starling occur there too, amongst others. The island also has breeding Hen Harrier.

**Recent Projects** – The National Parks and Wildlife Service (NPWS) has recently commissioned a Strategy for Hen Harrier on Scattery Island for the period 2024-2034. This strategy will set out appropriate measures for conserving and enhancing the island for Hen Harrier and wildlife on the island. Currently, NPWS and the Office of Public Works coordinate together to manage the site for wildlife, locals and visitors alike. It is in this regard that the OPW wishes to highlight its concerns for the natural heritage of the island.

**National Heritage** – The aforementioned stakeholders collaborate on implementing measures to conserve breeding bird habitats on the island. These measures include 'disturbance reduction' such as path closures, visitor management and timing of maintenance works. There is a concern that the construction and operation of the proposed development (Shannon Technology and Energy Park (STEP) Power Plant) could have a potentially negative impact on Scattery Island as a site for both breeding (nesting) birds and wintering birds. In this regard, the OPW requests that An Bord Pleanála give full consideration of the potential impacts in their analysis of the Natura Impact Statement (NIS) that accompanies this SID.



#### 4.0 LISLAUGHTIN ABBEY, LISLAUGHTIN, BALLYLONGFORD, CO. KERRY

Record of Monuments and Places (RMP) – KE003-016----  
National Monument Number - 258

Lislaughtin Abbey is a medieval Franciscan friary and National Monument located in County Kerry, Ireland. The OPW is responsible for the care, maintenance and operation of this site. At present, the OPW Killarney National Monuments district staff are on site at Lislaughtin Abbey carrying out wall top and masonry repairs. It is estimated that these works will be on-going and probably take a number of years to complete.

In Kerry County Council's *Listowel MD Local Area Plan 2023-2029*, this abbey is cited as being an important point of cultural and heritage interest in the local environment as follows:

Ballylongford has two heritage trails which include points of interest such as Lislaughtin Abbey and Carrigafoyle Castle (page 13).

The wider MD area has strong historical, social and architectural heritage with St. Brendan's Church, Carrigafoyle Castle, Rattoo Tower and Lislaughtin Abbey to name but a few (page 17).

The OPW notes that in Volume 2, Chapter 12: Cultural Heritage of the Environmental Impact Assessment Report that accompanies this SID, the following analysis of the impact of the Shannon Technology and Energy Park (STEP) Power Plant on this abbey is included:

A total of three cultural heritage assets - Ralapane House (RPS-KY-0888), Lookout Post (RP- KY-0877) and Lislaughtin Abbey (NM No. 258) which were considered to be potentially sensitive to the Proposed Development were visited as closely as possible from publicly accessible locations. Their settings and how it contributes to their importance were assessed. The Proposed Development was found to be screened from these assets by topography, or multiple areas of dense vegetation. Furthermore, it was concluded that the location of the Proposed Development does not contribute to the importance of these assets (page 12:10).

Having analysed the photomontages that accompany this SID, the OPW does not share the above opinion that the proposed development will be screened from the cultural heritage asset of Lislaughtin Abbey. See excerpt overleaf from View No. 7 of the photomontages. The OPW is of the opinion that the proposed development will have a significant negative visual impact on the setting of the National Monument.

The OPW requests that An Bord Pleanála give full consideration to this concern in their analysis of local and national planning policy, and in their review of the planning drawings, topographical maps, photomontages and Environmental Impact Assessment Report (EIAR) that accompany this SID. Consideration should be given to mitigation measures such as a visual screening belt of native trees.



Fig. 1: 'View 7. Proposed' from Appendix A10.1: Booklet of Photomontages.

## 5.0 CONCLUSION

The OPW wishes to outline its support in principle for this SID (Shannon Technology and Energy Park (STEP) Power Plant). It is noted that this site has been identified as a Strategic Development Location in the *Shannon Integrated Framework Plan 2013-2020 (SIFP)*, the *Regional Spatial and Economic Strategy (RSES) for the Southern Region 2020* and the *Kerry County Development Plan 2022*.

The OPW acknowledges that this development is necessary to deliver on the targets in Ireland's *Climate Action Plan 2024* to support renewables. It is noted that this proposed facility will enable remaining oil and coal fired power stations to be decommissioned and to be replaced with an efficient, fast responding power plant.

Notwithstanding the above, the OPW requests that An Bord Pleanála give full consideration to the points raised in this observation letter. If anything further is required, please do not hesitate to contact the undersigned.

Mise le meas,

A handwritten signature in black ink on a light-colored background, reading 'Ciaran O'Connor'.

**Ciaran O'Connor (Commissioner) State/Principal Architect FRIAI**

Office of Public Works  
1GQ  
Georges Quay  
Dublin 2  
D02 Y098

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