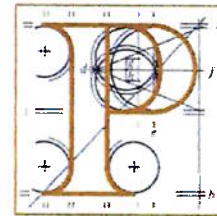


**Our Case Number:** ABP-320300-24



**An  
Bord  
Pleanála**

Not Here Not Anywhere  
c/o Britta Thiemt  
8 Hampton  
Dublin 9  
D09 DX8F

**Date:** 30 September 2024

**Re:** Proposed development of a Gas Insulated Switchgear (GIS) substation compound  
In the townlands of Carhoona, Carhoonakilla, Carhoonakineely, Cockhill, Coolnagoonagh,  
Farranawana, Kilcolgan Lower, Kilcolgan Upper, Kilpaddoge and Ralappane, County Kerry  
([www.STEP220kVConnection.com](http://www.STEP220kVConnection.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](http://www.pleanala.ie).

If you have any queries in the meantime, please contact the undersigned officer of the Board or email [sids@pleanala.ie](mailto:sids@pleanala.ie) quoting the above mentioned An Bord Pleanála reference number in any correspondence with the Board.

Yours faithfully,

  
Ellen Mose  
Executive Officer  
Direct Line: 01-8737285

VA05

**Teil**  
Glao Áitiúil  
**Facs**  
Láithreán Gréasáin  
Ríomhphost

**Tel** (01) 858 8100  
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**Fax** (01) 872 2684  
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64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902



Not Here Not Anywhere

8 Hampton  
Dublin 9 D09 DX8F

For a fossil free future for Ireland

An Bord Pleanála  
64 Marlborough Street,  
Dublin 1,  
D01 V902

**Planning Application Reference Number:** VA08.320300

**Applicant:** Shannon LNG Limited

**Location:** Carhoona, Carhoonakilla, Carhoonakineely, Cockhill, Coolnagoonagh, Farranawana, Kilcolgan Lower, Kilcolgan Upper, Kilpaddoge and Ralappane, County Kerry

To whom it may concern,

This submission is made on behalf of Not Here Not Anywhere (NHNA), a nationwide, grassroots, non-partisan group campaigning to end fossil fuel exploration and the development of new fossil fuel infrastructure in Ireland.

We are writing to object to the planning application for the Gas Insulated Switchgear (GIS) substation compound for Shannon LNG Limited.

We understand the applicant is applying for this substation to connect the power plant which they applied for separately (ABP-PA08.319566) only several months ago. The current application is premature as should the application for the power plant be rejected, the proposed substation infrastructure would be obsolete. Part of the applicant's arguments for the substation and the power plant is that they intend to construct a data centre campus and further gas infrastructure. Both would be detrimental to the surrounding environment and in terms of their staggering greenhouse gas emissions, would exacerbate the ongoing climate and biodiversity crisis we are in.

Though not in itself fossil fuel infrastructure, the substation's only purpose would be to enable the gas power plant and a data centre campus which would increase the already enormous electricity demand from data centres (21% of Irish electricity demand). Permission for this application or the associated projects should not be granted as they would directly work against Ireland's emissions reduction targets.

In 2023, the United Nations Environment Programme (UNEP) made the scale of the emissions reduction challenge very clear:

"In just seven years, global GHG emissions must be reduced by 28-42 per cent compared to where they are headed under policies currently in place, to get to levels consistent with pathways that limit global warming to well below 2.0°C and 1.5°C respectively" (United Nations Environment Programme, 2023, p. 1).

This urgent need to reduce emissions has led UNEP to conclude that:

"Globally, this leaves no room for new fossil fuel infrastructure... Instead, new energy investments should focus on clean energy supply and end-use electrification to avoid further increasing committed emissions (International Energy Agency [IEA] 2021; IISD 2022; IEA 2023; Stockholm Environment Institute et al. 2023)" (United Nations Environment Programme, 2023, p. 35)

Here in Ireland, our Climate Action Plan (CAP23) sets out ambitious targets for emission reduction and emphasises "the importance for Ireland to eliminate our dependency on fossil fuels" (Government of Ireland, 2023, p.131). At the COP28 climate summit in Dubai in December 2023, Ireland joined most countries in the world in agreeing to "transition away from fossil fuels."

In line with those commitments, we must rapidly phase gas out of the energy mix in Ireland. Modelling by University College Cork's (UCC) MaREI Centre showed that gas demand must reduce consistently from 2020 onwards, by at least 11% by 2030 and 37% by 2040 compared to 2020 figures, if we are to achieve 2050 decarbonisation targets (UCC, 2020).

The SEAI's National Energy Projections for 2023 (SEAI, 2023) warns that Ireland will not achieve its legally binding carbon budget targets. SEAI forecasts that gas usage will continue to increase but will need to start decreasing by 2025.

An important aspect of Bord Pleanála decisions is to consider environmental issues, as stated on its website the Bord must "consider the totality of the environmental issues involved in the context of the proper planning and sustainable development of the area, and may refuse planning permission or approval on environmental grounds". As outlined above, this application would have a negative effect on the local and national environment.

Therefore, we urge you to deny permission for this application.

Kind regards,

Britta Thiemt on behalf of  
Not Here Not Anywhere