



STRATEGIC INFRASTRUCTURE DEVELOPMENT PLANNING REPORT

In respect of lands at
**Kilshane Road, Kilshane,
Finglas, Dublin 11**

Prepared on behalf of
Kilshane Energy Ltd.

May 2026

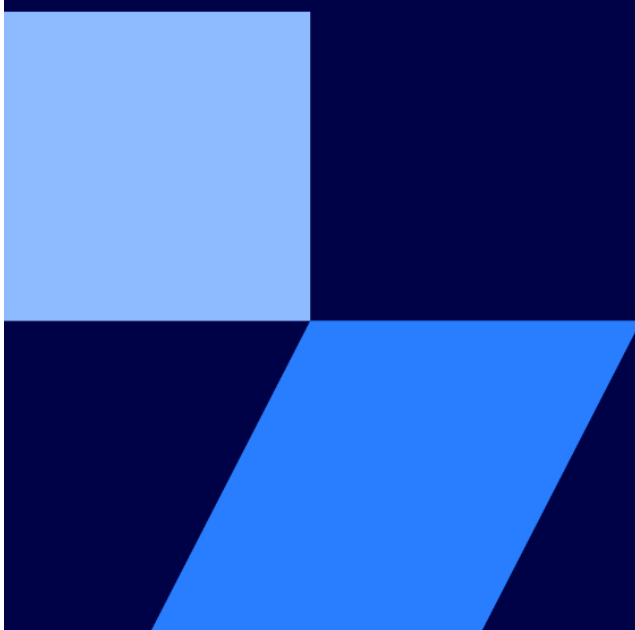


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DOCUMENT CONTROL SHEET

Client:	Kilshane Energy Ltd.
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1.0 INTRODUCTION

On behalf of our client, Kilshane Energy Ltd, Unit 8 CTEK, Riverside Road, Carrickmacross, Co. Monaghan, A81 XF29, and further to a determination received from An Coimisiún Pleanála on the 29th April 2026 confirming the proposed development constitutes Strategic Infrastructure Development (SID) pursuant the Section 37E of the Planning & Development Act 2000 (as amended), we hereby submit this application for approval in respect of a proposal for the provision of a 680MW Gas-Fired Generation Station consisting of two open cycle gas turbines (OCGT), each with an output of up to 340MW, along with backup fuel storage, ancillary structures, and services, on a site located at Kilshane Road, Kilshane, Finglas, Dublin 11.

The proposal also includes a 400kV gas-insulated (GIS) building and associated compound to serve the proposed generation station.

The location and context of the proposed development is described in further detail in Section 2 below. The proposed development is described as follows within the public notices for the application as follows:

“The Proposed Development is a Power Generation Station development and comprises 2 no. Open Cycle Gas Turbines, with an output of up to 340 Megawatts (MW) each, equating to a total output of up to 680MW, along associated ancillary structures, and services, including an Air Insulated Substation (AIS) adjacent to each of the turbines. The Proposed Development also includes the construction of a 400kV Gas Insulated Switchgear (GIS) substation. The proposed GIS substation will be connected to the national grid by way of a 400kV transmission line connection, which will be subject to a separate application.”

The proposals will comprise the following:

- *Construction of 2 no. Gas Turbines, with an output of up to 340 Megawatts (MW) each, along with ancillary structures and auxiliary equipment associated with each of the two turbines (including gas turbine oil tank, rotor displacement system, natural gas system, hydraulic oil equipment, pneumatic system for blow-off valves, lube oil cooler, and fuel oil skid). Each of the turbines will have an exhaust stack with a height of c. 28m, with a height to the top of the evaporative cooler of c. 25.5m.*
- *Adjacent to each of the turbines, the development will also comprise a single storey Packaged Electrical and Electronic Control Centre (PEECC) with a height of c. 6m and a gross floor area (GFA) of c. 321 sq.m.; fan cooler systems with a height of c. 4m; a single storey Continuous Emission Monitoring System (CEMS) Shelter with a height of c. 2.9m and GFA of c. 9 sq.m.; single storey gas heater structure with a height of c. 3.2m and GFA of c. 43 sq.m.; backup generator structure with a height of c. 3.2m and GFA of c. 30 sq.m.; compressor cleaning structure with a height of c. 3.7m and GFA of c. 11 sq.m.; transformer structure with a height of c. 3.2m and GFA of c. 9 sq.m.; and associated plant and equipment including a demineralised water tank with a height of c. 5.2m, CO2 bottles, and an air dryer with a height of c. 1.9m.*
- *Adjacent to each of the gas turbines, the development includes an Air Insulated Substations (AIS) to house transformers and electrical equipment within fenced compounds.*
- *The proposed development will be bound to its northern and part of its eastern boundary by acoustic fencing (c. 12m in height).*
- *Construction of a 400kV GIS building (two storeys, with an overall height of c. 17m and a gross floor area of c. 907 sq.m.) and associated electrical equipment located to the northwest of the site, within a fenced compound.*
- *Provision of hard and soft landscaping works, tree planting and boundary treatments. Attenuation storage will be located to the southeast of the site, alongside the existing permitted attenuation storage.*

- *The proposals will be provided on two areas of stone surfacing. Access and services to connect to the adjacent permitted development. Additional planting is proposed across the site and all associated works. The development includes underground services, lighting, and associated site development and ancillary works, above and below ground, necessary to facilitate the development.*

An EPA-Industrial Emissions Directive (IE) licence will be applied for to facilitate the operation of the proposed development. An Environmental Impact Assessment Report ('EIAR') will be submitted with the application."

1.1 APPLICANT AND AGENT FOR THE APPLICATION

The applicant (developer) for the proposed development is Kilshane Energy Ltd with a registered address at Unit 8 CTEK, Riverside Road, Carrickmacross, Co. Monaghan, A81 XF29.

The applicant can be contacted by email at brian@kilshaneenergy.ie.

The company registration number of Kilshane Energy Limited is 703084.

The agent acting on behalf of the applicant is JSA Planning, with an address at 39 Fitzwilliam Place, Dublin 2. Mr Luke Wymer is the contact within JSA Planning and can be contacted on (01) 6625803, or by email at lwymmer@jsaplanning.ie.

1.2 SID PRE-APPLICATION DETERMINATION

A pre-application determination from An Coimisiún Pleanála was requested by the applicant on 25th November 2025.

Having regard to the anticipated energy output of the proposed thermal power station the Commission considered that the proposed development constitutes development that falls within the relevant definition of energy infrastructure in the Seventh Schedule of the Planning & Development Act, 2000 (as amended), thereby satisfying the requirements set out in section 37A(1) of the Act.

The proposed development is also considered to be of strategic importance by reference to the requirements of sections 37A(2)(a) and (b) of the Planning & Development Act, 2000 (as amended). The Commission is of the opinion that the proposed development constitutes a strategic infrastructure development within the meaning of section 37A of the Act and an application for permission for the proposed development must therefore be made directly to An Coimisiún Pleanála under section 37E of the Planning & Development Act, 2000 (as amended).

The Commission also confirmed that the proposed development falls within two of the three paragraphs under section 37A(2) of the PDA and given that the application significantly exceeds one of the thresholds under the Seventh Schedule, it is considered that the proposed development constitutes SID.

The Commission's Inspector's Report on the pre-application stage noted the following:

"Having regard to the Climate Action Plan 2025, Ireland's energy security strategy, 'Energy Security in Ireland to 2030' (2023) and to Circular Letter PL 12/2021 and to the nature and scale of the proposed development, with an expected power output of 680MW. I consider that the proposed development would be of strategic economic and social importance to the state and the region and would therefore satisfy s37A (2) (a) of the Act."

In relation to the consideration of the development under section 37A(2)(b):

“The First Revision of the National Planning Framework (2025) includes the following National Policy Objectives (NPO) of relevance:

NPO 61 of the National Planning Framework (NPF) states: “ in co-operation with relevant Departments in Northern Ireland, strengthen all-island energy infrastructure and interconnection capacity, including distribution and transmission networks to enhance security of electricity supply,”

While reference is made to co-operating with Departments in Northern Ireland to strengthen all-island energy infrastructure, this wording does not preclude relevant infrastructure projects in the Republic of Ireland, such as the subject of this pre-app consultation, to enhance security of electricity supply

NPO 69 states: “ Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.”

As set out above, the proposed development will substantially contribute to a stated KPI in the Climate Action Plan 2025 to deliver at least 2 GW of new flexible gas-fired generation nationally.

NPO 70 states: “Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050.”

The proposed gas-fired electricity generation facility will, according to application documentation, “enable the retirement of inefficient and carbon intensive generation assets on the national grid, and the wider rollout of renewable energy in the region and the State.” The proposed development will support the transition of the energy system to a greater percentage of renewable sources while providing for security of energy supply. Having regard to the foregoing, I am satisfied that the proposed development will contribute to meeting national objectives towards achieving a low carbon economy by 2050.

With respect to the Eastern and Midland Regional and Spatial Economic Strategy (RSES), Regional Policy Objective (RPO) 10.20 states:

“Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy. This Includes the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity and gas transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process,”

The proposed development would contribute substantially to this objective in the RSES.

Having regard to the foregoing, I consider the proposed development would contribute substantially to the fulfilment of NPO 61, NPO 69, NPO 70 of the NPF and RPO 10,20 of the RSES and satisfies s37A (2) (b) of the Act in this regard.”

The Inspector’s Report concluded as follows:

“Based on the above assessment, it can be concluded that the proposed development would exceed the threshold set out in the Seventh Schedule of the Act and therefore satisfies the

requirements of s.37A (1) of the Act. It can also be determined that the proposed development is of strategic importance by reference to the requirements of sections 37A(2)(a) and (b) of the Act. Accordingly, the proposed development constitutes strategic infrastructure.”

1.3 LEGAL INTEREST IN THE SUBJECT LANDS

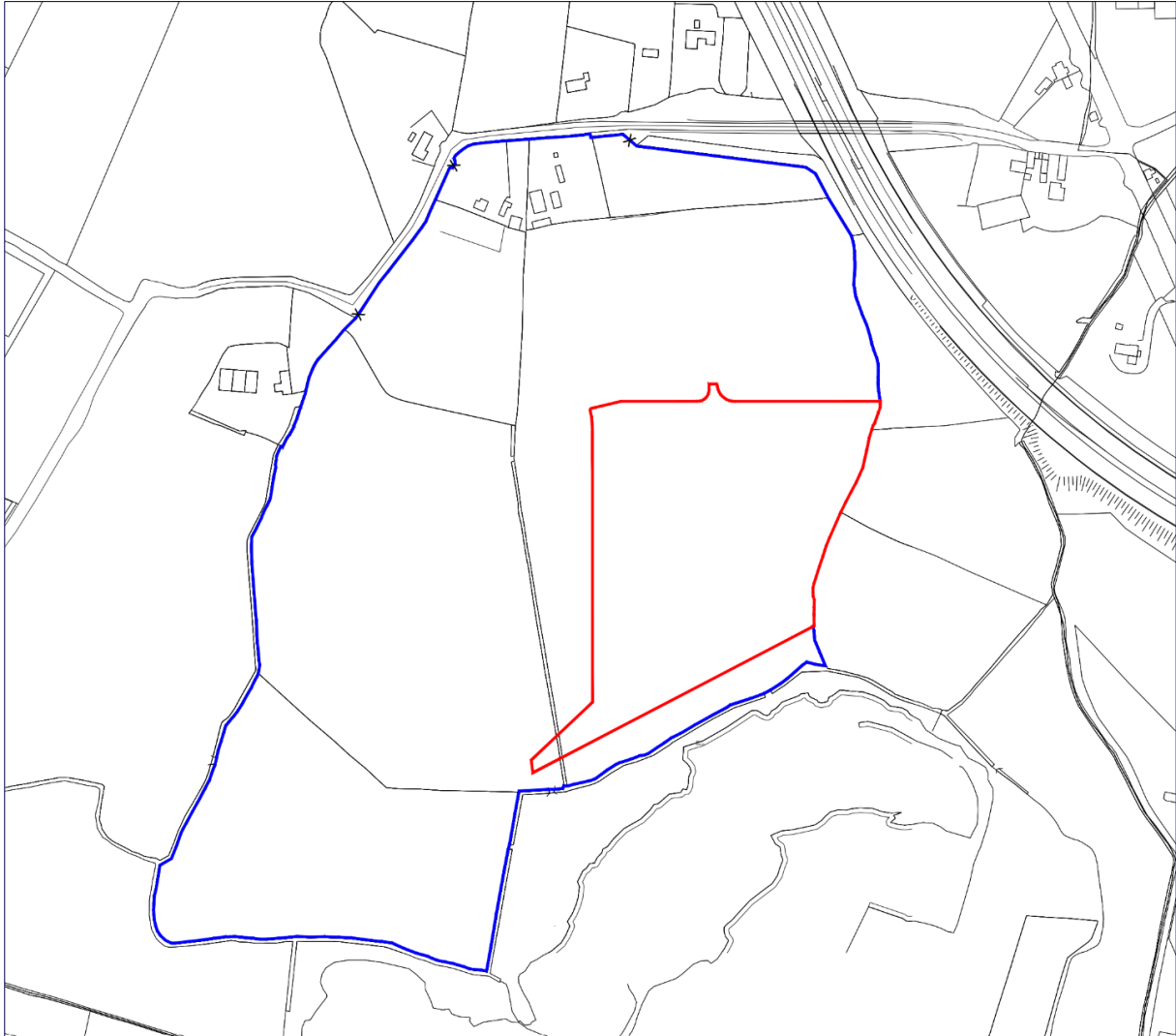
The Applicant is not the owner of the subject lands, on which the development will be located at Kilshane Road, Kilshane, Finglas, Dublin 11. The owner of the subject lands is another company within the same group as the applicant company, LCC Properties and Investments (Ireland) Ltd, with an address at Unit 8 Tek, Riverside Road, Carrickmacross, Co. Monaghan, Ireland. A letter of consent from the landowner is enclosed as part of this application.

2.0 SITE LOCATION AND CONTEXT

The proposed development is located within the townland of Kilshane, located to the south and west of the N2 at Kilshane Road, Kilshane, Finglas, Dublin 11. The site is located c. 2km northwest of the M50. The site currently comprises greenfield lands which are bound by existing hedgerows.

The site comprises an area of c. 5.25 hectares. The site is located to the south of Kilshane Road and the site of a permitted peaking power generation station permitted under FCC Reg. Ref.: FW22A/0204 and ABP Ref.: 317480-23 as amended by FCC Reg. Ref.: FW25A/0523E, and adjacent to the site of a permitted 220kV Gas Insulated Switchgear substation permitted under ACP Ref.: 314894-22. The site is to the west of the M2 motorway, to the north of Roadstone Huntstown Quarry, and to the east of agricultural lands and Northwest Logistics Park

Figure 2.1: Site Location Map



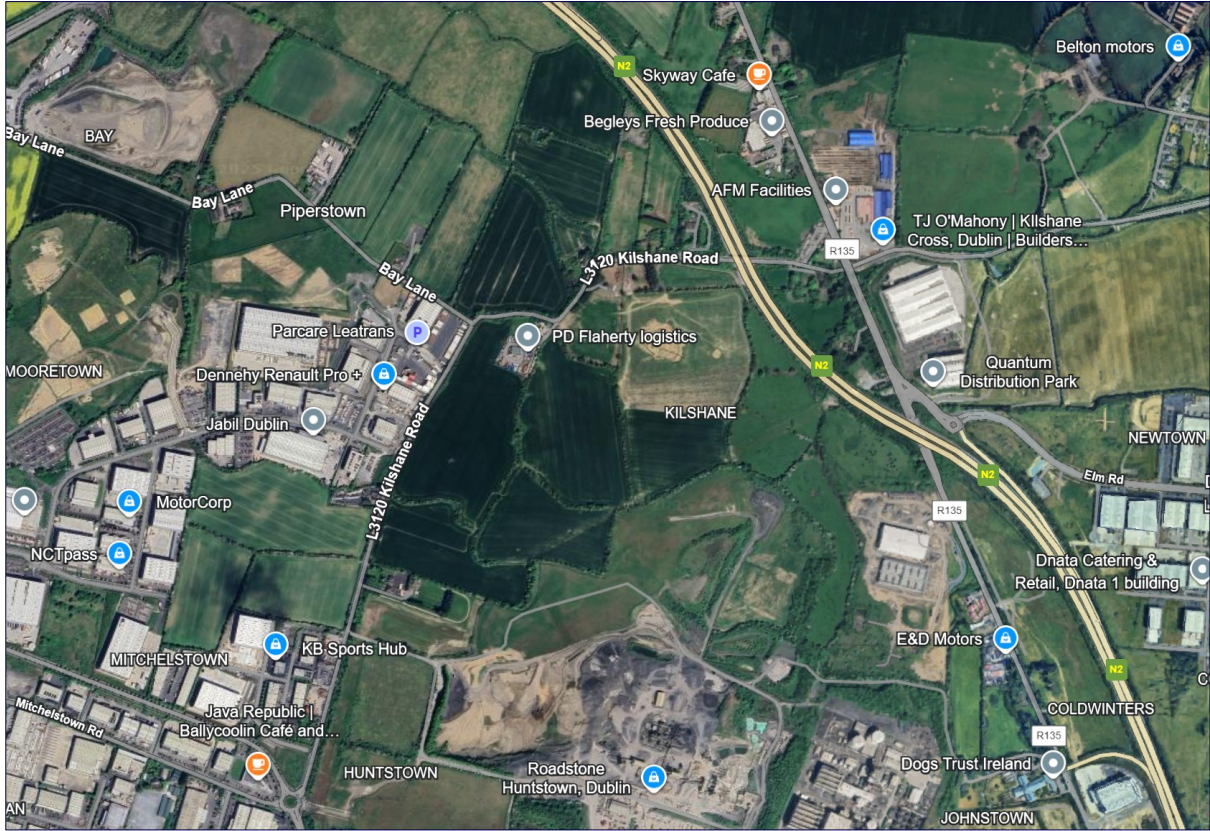
Source: Extract from Site Location Map submitted with this Application

The wider area surrounding the site comprises lands which are characterised by greenfield lands and existing industrial / logistics / warehouse development. To the west of the site is a small-scale haulage premises (PD Flaherty Logistics). Beyond the M2 to the east are areas of commercial / logistics development including Quantum Distribution Park and Dublin Airport Logistics Park, beyond which lies further greenfield lands and Dublin Airport. The wider surrounding area also accommodates existing power generation installations at Huntstown, while lands further to the south and southwest accommodate high technology and ICT related developments.

The closest area of predominantly residential development of scale is the Hollywoodrath residential area, which is c. 2km west of the subject site. The site is located c. 4.6km northeast of Blanchardstown Town Centre and c. 2.5km from retail facilities at Charlestown.

The site is well served by existing road infrastructure, and the proposed development will connect directly to the circulation road infrastructure permitted under the development (by the same applicant) to the immediate north of the current application site under FCC Reg. Ref.: FW22A/0204 and ABP Ref.: 317480-23, as amended by FW25A/0523E.

Figure 2.2: Aerial View of the Subject Site and Surrounding Area



Source: Google Maps

3.0 PLANNING HISTORY

This section of the planning report sets out the relevant planning history pertaining to the subject site and surrounding lands.

Other relevant applications in the wider site context are discussed below in further detail.

3.1 PLANNING HISTORY OF THE SUBJECT SITE

FCC Reg. Ref. FW25A/0523E – Revisions to FW22A/0204 – Gas Turbine Generation Station Including the Subject Site Lands and Lands to the North

Fingal County Council issued a notification of decision to grant permission on the 23rd April 2026, for revisions to the previously approved Gas Turbine Power Generation Station (Reg. Ref: FW22A/0204) at a site located at Kilshane Road, Kilshane, Finglas, Dublin 11, comprising the following amendments:

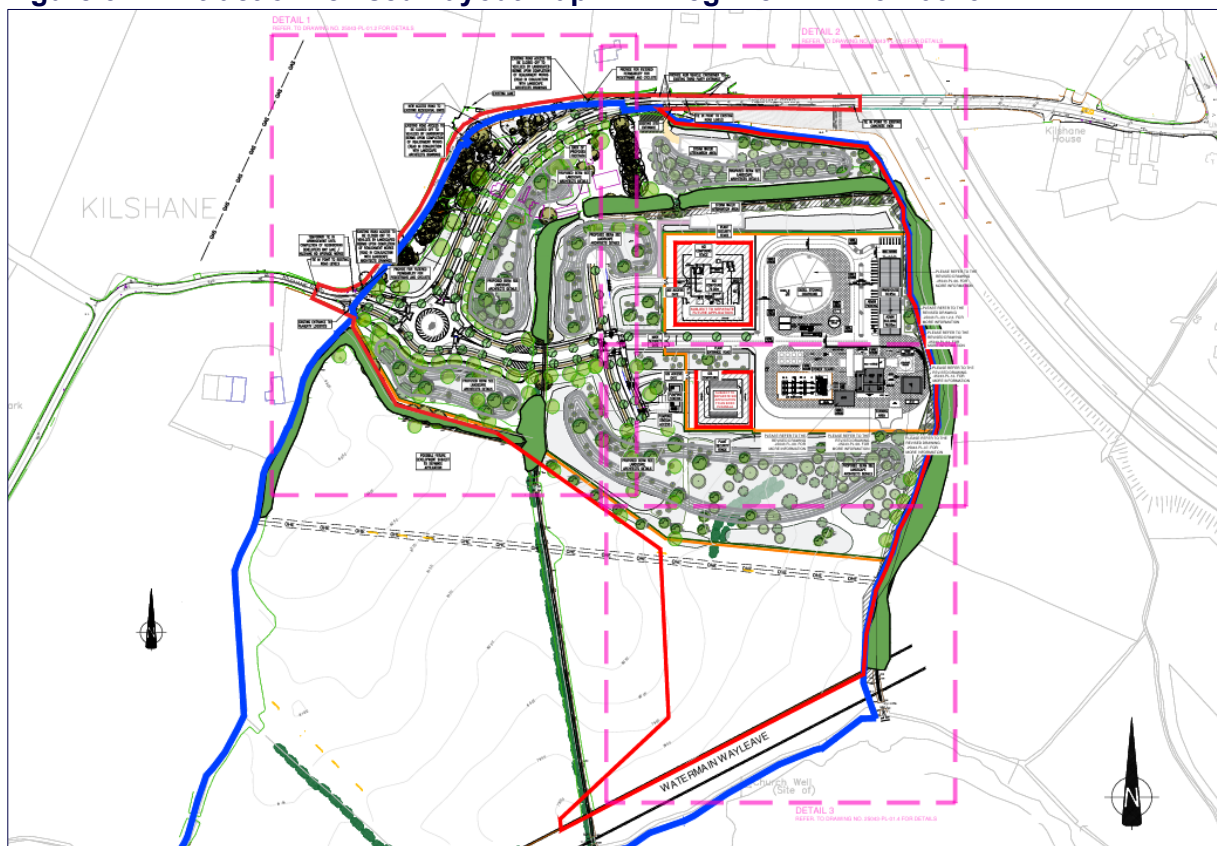
1. *“Revisions to previously approved administrative/warehouse building consisting of the following: (a) Revised internal layout consisting of addition of new stair core and lift at ground floor level connecting to new storage area at first floor level (428 m² GFA), increasing the total GFA of the administrative/warehouse building from 855 m² to 1283 m². (b) Revised façade design to elevations including revised fenestration to south elevation, revised fenestration and door design to west elevation, revised fenestration to east elevation and provision of new external fire staircase and first floor level access door to east elevation. (c) Increase in height of administrative/warehouse building by 1 m to 7.38 m. (d) Revised colour of material finish from green to dark grey.*
2. *Revisions to previously approved gas turbine including revised shape of evaporative cooler, addition of servicing gantries and the slight moving of the gas turbine c. 5.57 m to the north as demonstrated on the enclosed architectural plans (Drg No. Drawing No. 25043-PL-04.1) Internal gas turbine machinery and installation as part of revised gas turbine model to be provided to later specialist design as previously approved under Reg. Ref. FW22A/0204.*
3. *Revised size and location of fin fan coolers within power island compound as demonstrated on enclosed architectural plans.*
4. *Revisions to layout of diesel storage compound to now provide 1 no. larger fuel storage tank with an increase in maximum height from 16.2 m to 20 m and an increase in diameter from 24.4 m to 49 m.*
5. *Revised design and location of the Packaged Electronic/Electrical Control Compartment (PEECC) within the power island compound to now comprise a single storey stilted building raised 2.6 m above ground level, accessed via 2 no. external stairs and a new servicing gantry at finished floor level, with a floor-to-ceiling height of 3.25 m and an overall height of 6 m, and an increase in GFA from 72 m² to 148.51 m² together with façade changes.*
6. *Revised design and location of BOP Power Distribution Centre within power island compound as demonstrated on enclosed architectural drawings including increase in GFA from 129 m² to 160.6 m² together with façade changes including revised fenestration to west and east elevations.*
7. *The addition of new Aux Equipment Block (connected to the Gas Turbine) with a GFA of 361.20 m² and height ranging from 7.65m to 9.59m and new servicing gantries for the purposes of sheltering specialist equipment and machinery as identified on the enclosed architectural drawings.*
8. *The addition of a HVAC Structure within power island compound with a maximum height of 8.84 m which supports two HVAC units on the top and the Starter Transformer and Excitation Transformer below.*

9. Revision to previously approved Acoustic Wall within power island compound consisting of a slight decrease in length from 107.0m to 101.6m.
10. Removal of previously approved 16.2m high x 18.3m dia Demin Water Tank and replaced with Separate Demin Water Tank to be added as a non-permanent structure rather a small cube refill tank.
11. Removal and replacement of select number of smaller equipment items as identified on the equipment identification drawings prepared by CWP/PA Planning & Architecture (Drawing No. 25043-PL-14).
12. Minor revision to internal road network as demonstrated on enclosed architectural drawings to accommodate proposed amendments.”

Prior to issuing the notification of decision to grant, the Planning Authority received:

- Further information on the 13th February 2026; and
- Clarification of further information on the 30th March 2026.

Figure 3.1: Extract of Revised Layout Map FCC Reg. Ref.: FW25A/0523E

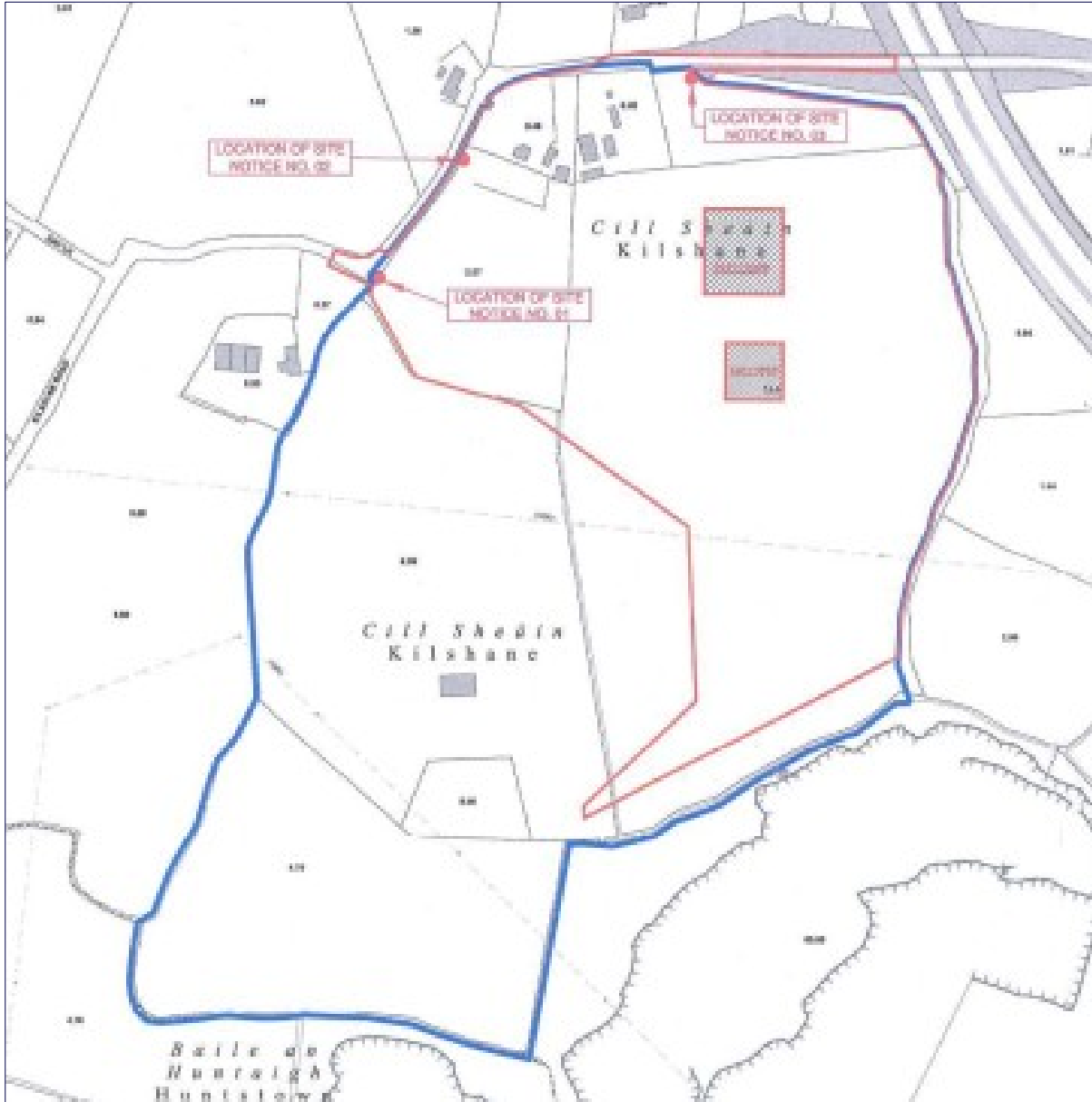


Source: Extract from Site Layout Map FCC Reg. Ref.: FW25A/0523E

FCC Reg. Ref. FW22A/0204 & ABP Reg. Ref.: 317480-23 – Gas Turbine Generation Station Including the Subject Site Lands and Lands to the North

Kilshane Energy Limited applied for planning permission to Fingal County Council (FCC) on 3rd May 2024 for the development of a gas turbine power generation station located to the north and northeast of the subject site, with the application site boundary including the subject site lands of this current application, on lands at Kilshane Road, Dublin 11.

Figure 3.2: Extract of Site Location Map FCC Reg. Ref.: FW22A/0204



Source: Extract from Site Location Map FCC Reg. Ref.: FW22A/0204

The proposed development comprises a new Gas Turbine Power Generation with an output of 293MW and the development is described as follows:

1. "1 no. Gas Turbine and 1 no. 28 m high Exhaust Stack partially enclosed by a 12 m high acoustic wall. 1 no. single storey Admin Building and Warehouse (c. 926 m²), 1 no. single storey Packaged Electronic/Electrical Control Compartment (PEECC) (c. 72 m²), 1 no. single storey Continuous Emission Monitoring System (CEMS) Shelter (c. 14.8 m²), 1 no. 16.2m high x 024.4m Fuel Oil Tank, 1 no. 15.3m high x 09.2m

Raw/Fire Water Tank, 1 no. 16.2m high x 018.3m Demin Water Tank, and miscellaneous plant equipment.

- 2. The demolition of a detached residential dwelling (c. 142 m² GFA) and associated farm buildings (c. 427 m² GFA) located in the northwest corner of the subject site to facilitate the proposed development.*
- 3. Road improvement works to 493.34 m Kilshane Road (L3120), including the realignment of a portion of the road (293.86 m) within the subject site boundary and the provision of new footpaths, off-road cycle ways, together with the construction of a new roundabout linking the proposed realignment of Kilshane Road back to the existing road network to the northeast of the subject site and to the proposed internal road network to serve the proposed development.*
- 4. The construction of entrance gates, low wall and railings fronting the realigned Kilshane Road and a private internal road network providing for vehicular, cyclist and pedestrian access to serve the development. Construction of 3 m high security fencing within development.*
- 5. Total provision of 26 no. car parking spaces including 1 no. disabled persons parking space and 2 no. EV electrical charging points.*
- 6. Provision of security lighting columns to serve the development and the installation of Closed-Circuit Television System (CCTV) for surveillance and security purposes.*
- 7. Provision of 20 no. sheltered bicycle parking spaces.*
- 8. Provision of hard and soft landscaping works, tree planting and boundary treatments including 3 m high security fence along Kilshane Road and the perimeter of the subject site boundary.*
- 9. Provision of new on-site foul sewer pumping station to serve the development and the provision of underground surface water attenuation areas.*

All associated site development and excavation works, above and below ground, necessary to facilitate the development

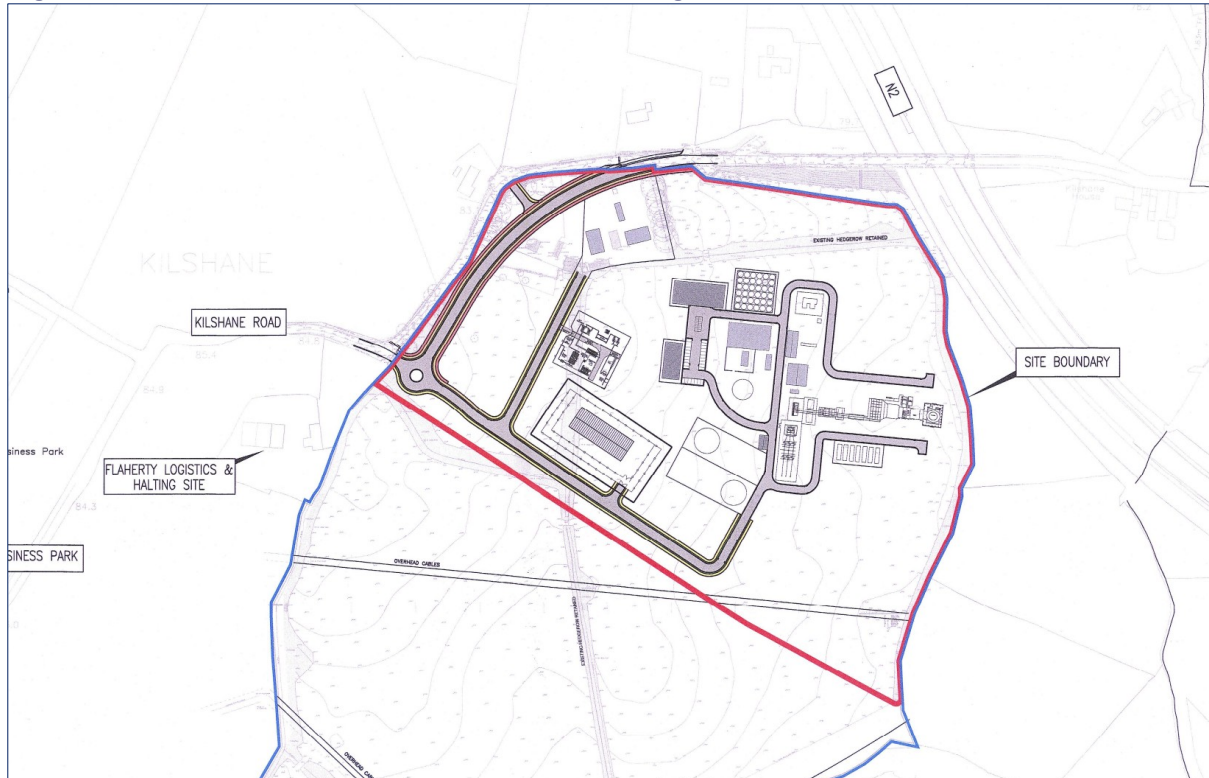
An Environmental Impact Assessment Report has been prepared in respect of the proposed development. This application relates to a development that will require an Industrial Emissions Directive licence from the Environmental Protection Agency. A subsequent application will be submitted for an Above Ground Installation (AGI) compound, underground gas supply installation and a subsequent Strategic Infrastructure Development (SID) Application will also be submitted for a Gas-Insulated Switchgear Substation (GIS), Air Insulated Switchgear Substation (AIS) and grid connection to serve the development.”

FCC granted planning permission subject to 34 no. conditions. This decision was appealed by third parties and permission was later granted by An Coimisiún Pleanála on 16th May 2024 ([ABP Ref.: ABP-317480-23](#)).

FCC Reg. Ref.: FW21A/0250 – Refused – Gas Turbine Power Generation Station (293MW)

Kilshane Energy Limited submitted an application to FCC on 16th December 2021 for permission for a Gas Turbine Power Generation Station with an output of up to 293MW on lands at Kilshane Road, Kilshane, Dublin 11.

Figure 3.3: Extract of Site Location Map FCC Reg. Ref.: FW21A/0250



Source: Extract of Site Location Map FCC Reg. Ref.: FW21A/0250

The proposal outlined in the public notices is as follows:

“Planning permission is being sought for a development that will consist of the following;

- 1) *The construction of a Gas Turbine Power Generation Station with an output of up to 293 Megawatts. The proposed station will consist of 1 no. Gas Turbine, 1 no. 28m high Exhaust Stack, 1 no. 2 story Admin Building (c. 680 m²), 1 no. single storey Workshop (c. 661 m²), 1 no. single storey Plant Room Building (c. 608 m²), 1 no. single storey Dew Point Heater Boiler Building (c. 52 m²), 1 no. single storey Electrical Module for Fuel Gas Area Building (c. 45 m²), 1 no. single storey Packaged Electronic Electrical Control Compartment building (PEECC) (c. 150 m²), 1 no. single storey EORoom Building (c. 227 m²), 1 no. single storey Fuel Gas Block Building (152 m²), 1 no. single storey Continuous Emission Monitoring System (CEMS) Building (c. 9 m²), 1 no. single storey Fuel Oil Treatment & Forwarding Building (c.59 m²), an Above Ground Installation (AGI) area consisting of 1 no. single storey Instrument Building (c. 28.5 m²), 1 no. single storey Regulator Building (47 m²), 1 no. single store Boiler Building (c. 28 m²), and 1 no. single storey Analyser Kiosk (6 m²), 2 no. 20 m high diesel storage tanks and recessed bund area, 1 no. 17 m high Raw and Fire Fighting Water Tank, miscellaneous plant and equipment.*
- 2) *The realignment of a portion (263 m) of the Kilshane Road within the subject site boundary, including the provision of new footpaths and off-road cycle ways, together with the construction of a new roundabout linking the proposed realignment of Kilshane Road back to the existing road network to the north west of the subject site and to the proposed internal road network to serve the proposed development.*

- 3) *The construction of Entrance Gates, 1 no. single storey security office (40 m2 GFA) and a private internal road network providing for vehicular, cyclist and pedestrian access to serve the development.*
- 4) *Total provision of 20 no. Car Parking Spaces including 2 no. disabled parking spaces and 4 no. Electrical Charging Points.*
- 5) *Provision of lighting columns to serve the development and the installation of Closed-Circuit Television System (CCTV) for surveillance and security purposes.*
- 6) *Provision of 20 no. Sheltered Bicycle Parking Spaces.*
- 7) *Provision of hard and soft landscaping works, tree planting and boundary treatments.*
- 8) *Construction of a Wastewater Treatment Plant and Percolation Area together with a Surface Water Attenuation Area to serve the development.*
- 9) *All associated site works necessary to facilitate the development.”*

The proposed development was refused for the following reasons:

- Insufficient information to complete an Appropriate Assessment.
- Insufficient information to enable the Planning Authority to ascertain if the proposal would require an EIA.
- Not satisfied that the proposal would not endanger or interfere with the safety of aircraft or the safe and efficient navigation thereof. Materially contravenes objective DA10 of the CDP 2017-2023.
- In the absence of clear information regarding the impacts of the proposal and mitigation measures to address these, the proposal could adversely affect the amenities of adjoining properties and depreciate the value of same.
- Due to the limited information submitted, the Planning Authority is not satisfied that the proposal would not give rise to adverse impacts on the green infrastructure, biodiversity, ecology, archaeology, landscape character and the visual amenities of the area. Materially contravenes objectives NH27, GI22, NH20, CH05, and CH06 of the CDP 2017-2023.

The above, revised application under FCC Reg. Ref.: FW22A/0204 post-dated this application and addressed these reasons for refusal.

3.2 PLANNING HISTORY OF SURROUNDING LANDS

FCC Reg. Ref.: FW23A/0232 – 291MW Gas Turbine Power Station to the West of the Subject Site

Kilshane Energy Limited applied for planning permission to FCC on 8th August 2023 for the development of a gas fired turbine power generation station on lands at Kilshane Road, Dublin 11 and immediately west of the subject site.

Figure 3.4: Proposed Site Layout Plan (FCC Reg. Ref.: FW23A/0232)



Source: Extract of Proposed Layout Plan FCC Reg. Ref.: FW23A/0232

The proposed development consisted of the following:

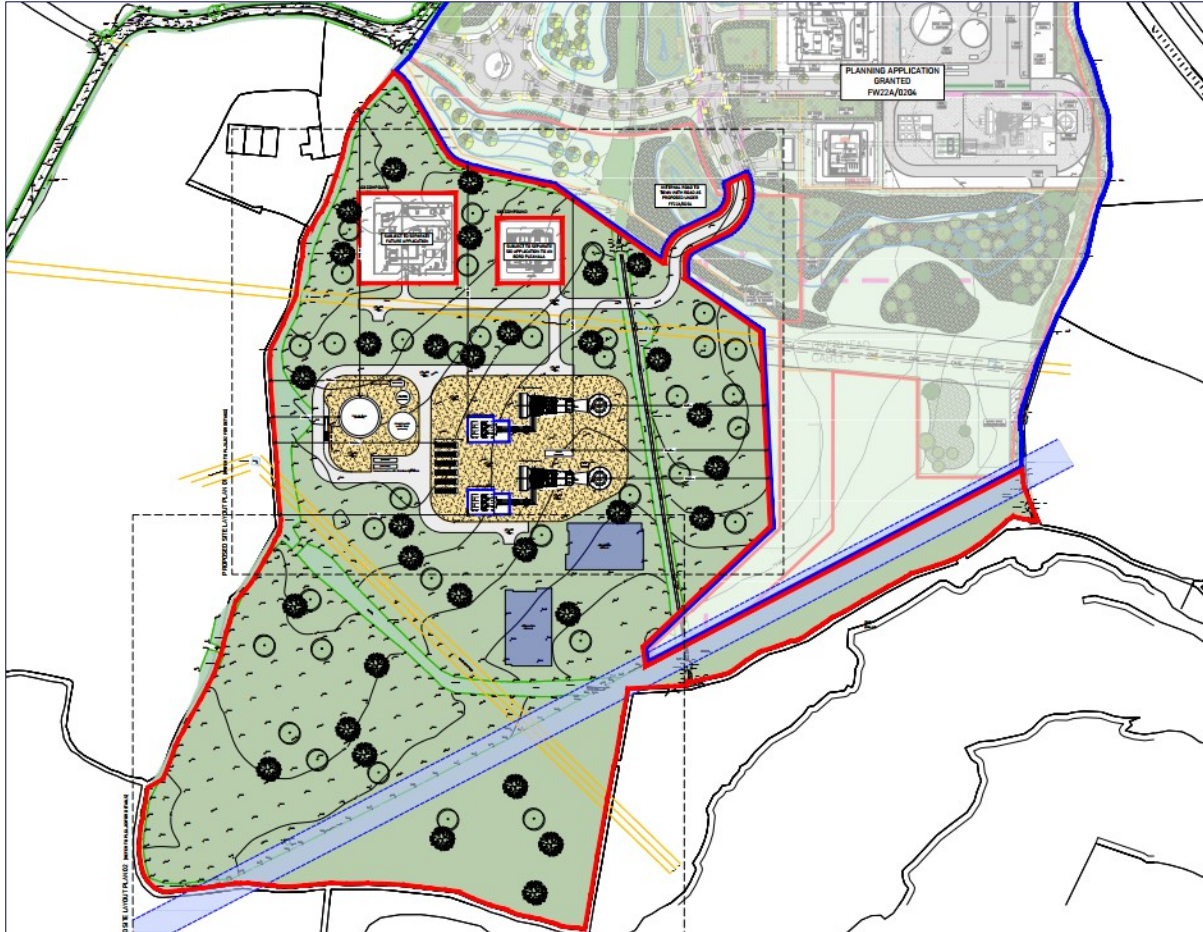
- *“The construction of new Gas Fired open cycle Turbine Power Generation Station with an output of up to 291 Megawatts. The proposed station will consist of 8 no. Gas Turbines and 8 no. 18 m high exhaust stacks, 1 no. AIS Substation and associated lighting column, 1 no. single storey Packaged Electronic /Electrical Control Compartment, 1 no. single storey continuous Emission Monitoring System Shelter, Associated Fin Fan Coolers, 1 no. Storage and Warehouse building, 1 no. fuel oil storage tank, 1 no. demineralised water storage tank, 1 no. raw/fire water storage tank, 1 no. fire pump house, 2 no. demineralised water treatment trailers.*
- *The construction of an internal road network providing for access to serve the development*
- *Provision of hard and soft landscaping works, tree planting and boundary treatments including parking perimeter fencing.”*

The application was withdrawn on 4th September 2023 before a decision on the application was made.

ABP Reg. Ref.: 320566 & ABP Reg. Ref.: 321017 – 600MW Peaking Power Generation Station to the West of the Subject Site

Kilshane Energy Limited submitted a pre-application consultation request (ABP Reg. Ref.: 320566) on 9th August 2024 to determine if proposed development on lands at Kilshane Road, Dublin 11, was considered Strategic Infrastructure Development (SID).

Figure 3.5: Extract from Proposed Site Layout Plan ABP Reg. Ref.: 320566



Source: Extract from Proposed Site Layout Plan ABP Reg. Ref.: 320566

The proposed development included a “600MW peaking power plant powered generation station comprising 2 no. OCGT each with an output of up to 300MW, along with backup fuelled storage, ancillary structures, and services including:

- *With an energy generation compound:*
 - *Two gas turbine sets, each with an exhaust stack to a height of c. 28m*
 - *A Packaged Electrical Control Compartment Building (PEECC)*
 - *A CEMS Shelter*
 - *Six Fin Fan Coolers*
 - *12m acoustic wall to the north and northeast*
- *Within an ancillary compound to the west:*
 - *Fuel Oil Tank (backup fuel)*
 - *Demineralised Water Tank*
 - *Raw / fire water tank*
 - *Fire pump house*
 - *Two mineralised water treatment trailers*
 - *Fuel unloading area*

The proposed will be provided on two areas of stone surfacing. Access and service roads are proposed, additional planting is proposed across the site and all associated works.”

An Coimisiún Pleanála determined that the proposed development constitutes as a SID on 25th September 2024 noting:

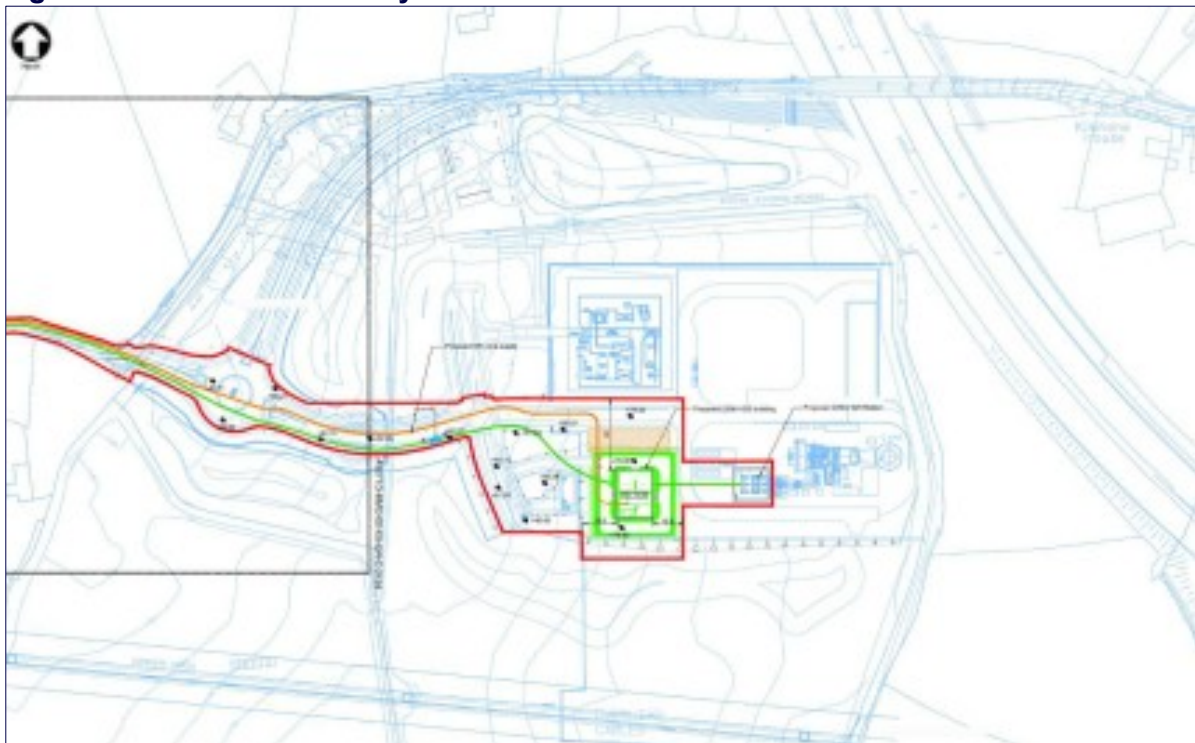
“Based on the assessment, it can be concluded that the proposed development would exceed the threshold set out in the Seventh Schedule of the Act and therefore satisfies the requirements of c.37A (1) of the Act. It can also be determined that the proposed development is of strategic importance buy reference to the requirements of sections 37A(2)(a) and (b) of the Act. Accordingly, the proposed development constitutes strategic infrastructure.”

A SID application was lodged to An Coimisiún Pleanála on 4th October 2024 and later withdrawn by the Applicant (Kilshane Energy Limited) on 8th November 2024 (ABP Reg. Ref.: 321017).

ABP Reg. Ref.: 314894-22 - 220kV GIS Substation and 220kV Transmission Line to the North

Kilshane Energy Limited applied to An Coimisiún Pleanála on 12th October 2022 for permission for a Strategic Infrastructure Development comprising a 220kV Gas Insulated Switchgear (GIS) substation on lands to the north of the subject site and a 220kV transmission line connection to existing 220kV Cruiserath substation.

Figure 3.6: Extract of Site Layout ABP Ref.: 314894-22



Source: Extract from Site Layout ABP Ref.: 314894-22

The proposed development consisted of a “220kV GIS substation which will including a proposed GIS substation building with a gross floor area of 475 sq.m, within a c. 2.6 metre fenced compound. The proposed GIS substation building has a maximum height of c. 13.5 metres, excluding lighting protection masts c. 2 metres in height at roof level. The GIS substation building will accommodate a switchgear room, control room, battery room, workshop, generator room, and staff facilities. A 220kV AIS substation compound, including

AIS electrical equipment within a fenced compound will be provided to the east of the GIS substation.”

The Commission issued a grant of permission on the 24th of August 2023, subject to 14 no. conditions, of which are summarised below:

- Prior to commencement of development, engage with the Irish Aviation Authority to confirm that the proposal and any associated construction equipment would have no impact on the safety of flight operation along identified critical low level routes in support of operational requirements.
- Prior to commencement of development, submit a Construction Environmental Management Plan (CEMP).
- Facilitate the archaeological appraisal of the site and provide for preservation, recording and protection of archaeological materials or features that may exist.

The landholding which the proposed 220kV substation is within was subject to a separate application under FCC. Reg. Ref.: FW22A/0204, in respect of a Gas Turbine Power Generation Development, further details of this application are set out above.

On 17th October 2025, a Section 146B was made to the Commission for alterations to this permitted Electricity Transmission development under ACP Reg. Ref.: 323812. The proposed alterations being sought can be summarised as follows:

- Relocation of the permitted 220kV Gas Insulated Switchgear (GIS) substation, including the substation compound and structures c. 10m to the north and c. 3m to the west.
- Alteration to the size of the permitted substation compound, comprising a reduction of c. 799 sq.m, to provide a compound of c, 1,767 sq.m.
- The omission of 2 no. car parking spaces permitted within the substation compound.
- Alteration to the permitted 220kV underground transmission line route within and directly adjacent to the altered substation compound, to take account of the altered location of the GIS substation building.

This s.146B request was approved by Commission on the 26th of March 2026.

4.0 DEVELOPMENT DESCRIPTION

The Proposed Development comprises 2 no. Gas Turbine Power Generation Stations, with an output of up to 340 Megawatts (MW) each, equating to a total output of up to 680MW, along with associated ancillary structures, and services, including an Air Insulated Substation (AIS) adjacent to each of the turbines.

The proposed development, as per the statutory notices, is set out below:

“The site is located to the south of Kilshane Road and the site of a permitted peaking power generation station permitted under FCC Reg. Ref.: FW22A/0204 and ABP Ref.: 317480-23 as amended by FCC Reg. Ref.: FW25A/0523E, and adjacent to the site of a permitted 220kV Gas Insulated Switchgear substation permitted under ACP Ref.: 314894-22. The site is to the west of the M2 motorway, to the north of Roadstone Huntstown Quarry, and to the east of agricultural lands and Northwest Logistics Park.

The Proposed Development is a Power Generation Station development and comprises 2 no. Open Cycle Gas Turbines, with an output of up to 340 Megawatts (MW) each, equating to a total output of up to 680MW, along associated ancillary structures, and services, including an Air Insulated Substation (AIS) adjacent to each of the turbines. The Proposed Development also includes the construction of a 400kV Gas Insulated Switchgear (GIS) substation. The proposed GIS substation will be connected to the national grid by way of a 400kV transmission line connection, which will be subject to a separate application.

The proposals will comprise the following:

- *Construction of 2 no. Gas Turbines, with an output of up to 340 Megawatts (MW) each, along with ancillary structures and auxiliary equipment associated with each of the two turbines (including gas turbine oil tank, rotor displacement system, natural gas system, hydraulic oil equipment, pneumatic system for blow-off valves, lube oil cooler, and fuel oil skid). Each of the turbines will have an exhaust stack with a height of c. 28m, with a height to the top of the evaporative cooler of c. 25.5m.*
- *Adjacent to each of the turbines, the development will also comprise a single storey Packaged Electrical and Electronic Control Centre (PEECC) with a height of c. 6m and a gross floor area (GFA) of c. 321 sq.m.; fan cooler systems with a height of c. 4m; a single storey Continuous Emission Monitoring System (CEMS) Shelter with a height of c. 2.9m and GFA of c. 9 sq.m.; single storey gas heater structure with a height of c. 3.2m and GFA of c. 43 sq.m.; backup generator structure with a height of c. 3.2m and GFA of c. 30 sq.m.; compressor cleaning structure with a height of c. 3.7m and GFA of c. 11 sq.m.; transformer structure with a height of c. 3.2m and GFA of c. 9 sq.m.; and associated plant and equipment including a demineralised water tank with a height of c. 5.2m, CO2 bottles, and an air dryer with a height of c. 1.9m.*
- *Adjacent to each of the gas turbines, the development includes an Air Insulated Substations (AIS) to house transformers and electrical equipment within fenced compounds.*
- *The proposed development will be bound to its northern and part of its eastern boundary by acoustic fencing (c. 12m in height).*
- *Construction of a 400kV GIS building (two storeys, with an overall height of c. 17m and a gross floor area of c. 907 sq.m.) and associated electrical equipment located to the northwest of the site, within a fenced compound.*
- *Provision of hard and soft landscaping works, tree planting and boundary treatments. Attenuation storage will be located to the southeast of the site, alongside the existing permitted attenuation storage.*
- *The proposals will be provided on two areas of stone surfacing. Access and services to connect to the adjacent permitted development. Additional planting is proposed across the site and all associated works. The development includes underground services,*

lighting, and associated site development and ancillary works, above and below ground, necessary to facilitate the development.

An EPA-Industrial Emissions Directive (IE) licence will be applied for to facilitate the operation of the proposed development.

An Environmental Impact Assessment Report ('EIAR') will be submitted with the application."

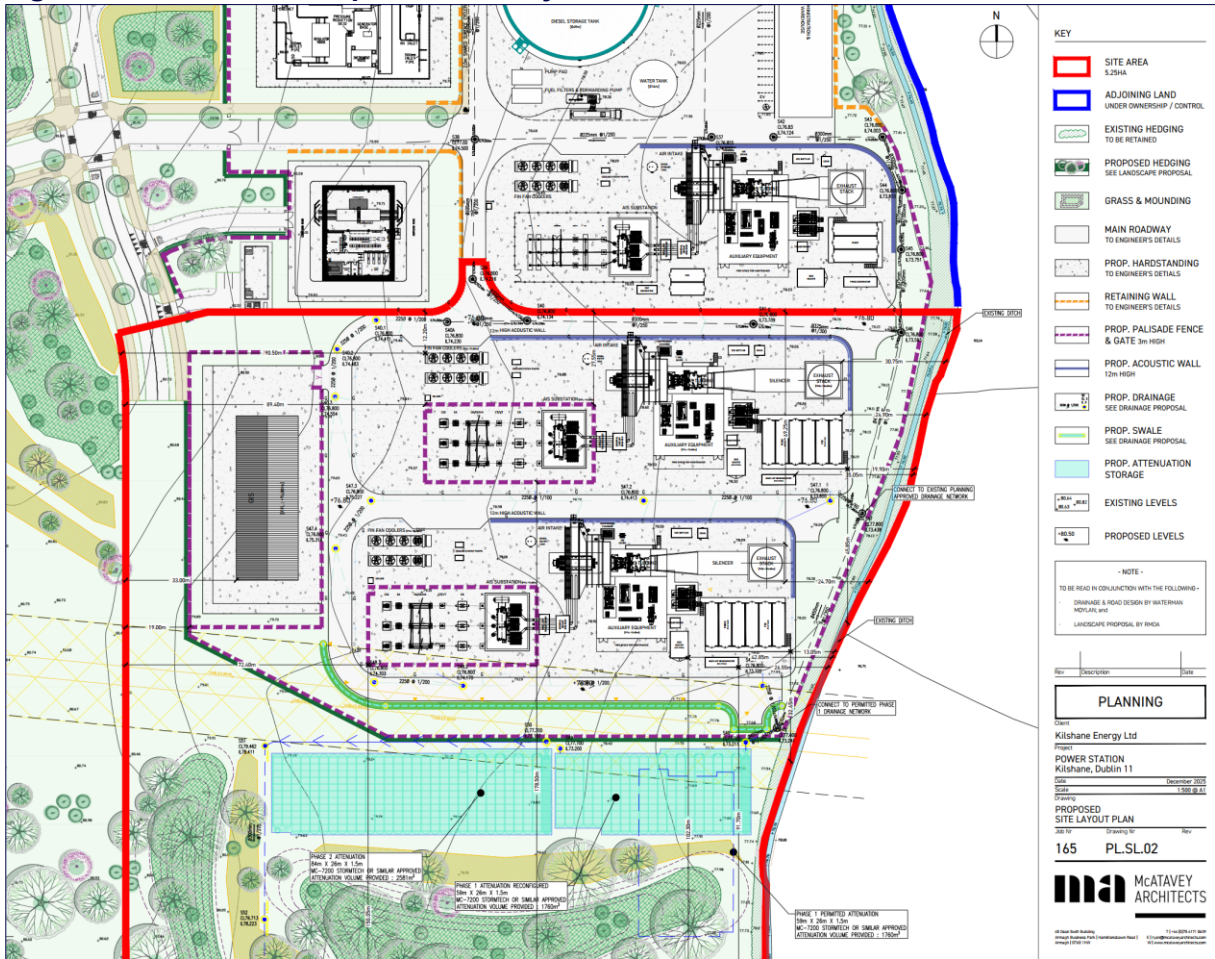
A Flexible Peaking Plant is a Gas Turbine Power Generation Station that can quickly dispatch power to balance fluctuating electricity demand in the grid due to intermittent renewable supplies. It is also used to provide a reliable source of backup generation for operating in times of high electricity demand and low renewable electricity supply. These peaking plants are crucial to avoid power outages and ensuring the security of electricity supply in a grid with increased renewable sources of energy.

The plant is required to be available to follow dispatch instructions from EirGrid, the Transmission System Operator (TSO).

The proposal also includes a 400kV gas-insulated substation (GIS) building and associated compound to serve the proposed generation station. The 400kV substation will be connected to the national grid by way of a 400kV transmission line connection. The route and connection point for the grid connection is subject to final confirmation with EirGrid and will be progressed by way of a separate Electricity Transmission application in due course, the connection is considered in the EIAR submitted with this application.

In summary, the flexible technology chosen will help facilitate a higher penetration of renewable generation being dispatched onto the system in line with the key targets set out in the Climate Action Plan 2025.

Figure 4.1: Extract of Proposed Site Layout Plan



Source: Extract from Proposed Site Layout Plan

Figure 4.2: 3D Visual of Proposed Development – Fin Fan Coolers & Turbine



Source: Extract from CGI Booklet Submitted with this Application

4.1 BOUNDARY TREATMENTS

A c. 3m high system fence will be provided along the western, southern and eastern outer boundary of the main site area, which includes the generation stations. Immediately outside of this fence, it is proposed to provide a native hedgerow, running along the entirety of the fence.

In addition, a c. 12m high acoustic wall be provided along the northern and eastern boundary of both generation station compounds and a retaining wall to the north.

Extensive planting is provided along the northeast and southeast of the site which provides for adequate screening and minimises the visual impact of the proposed development. The existing hedgerow along the eastern, western and southern boundary will also be retained.

Please refer to the landscape plans and reports prepared by RMDA Landscape Architects for further information.

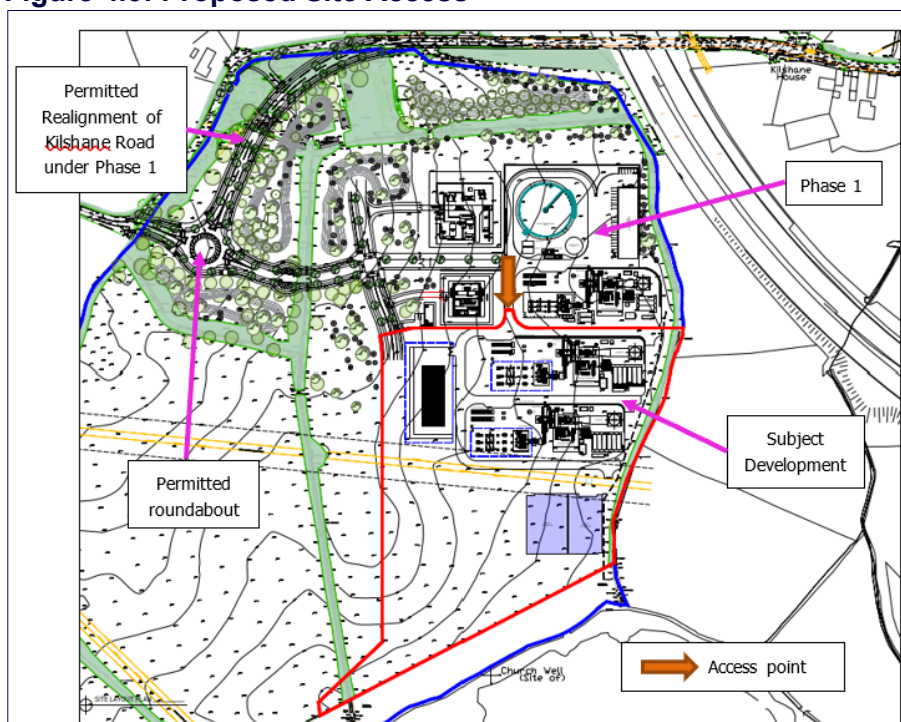
4.2 SITE ACCESS

Vehicular access to the subject site will be provided via a new roundabout which connects to the internal road network to the north permitted under Phase 1.

A section of the Kilshane Road will also be realigned and upgrade under the Phase 1 development and will provide for a dedicated 2-metre-wide footpath and cycle path on both sides of the carriageway.

The proposed development will not include new carparking spaces, and parking availability will remain as per permitted development with 26 no. car parking spaces including 1 no. accessible parking space and 2 no. EV spaces. Parking will be available by the permitted Administration/Warehouse building, outside the proposed development redline boundary.

Figure 4.3: Proposed Site Access



Source: TBC

Figure 4.4: CGI of Proposed Development – Aerial View (1)



Source: Extract from CGI Booklet Submitted with this Application

Figure 4.5: CGI of Proposed Development – Aerial View (2)



Source: Extract from CGI Booklet Submitted with this Application

5.0 NATIONAL AND REGIONAL PLANNING POLICY CONTEXT

The National Planning Framework First Revision (NPF), published in April 2025 and incorporates amendments resulting from the public consultation process on the First Revision of the Draft Revised National Planning Framework 2040.

The NPF puts emphasis the national energy policy which is focused around three pillars including:

- (1) Sustainability;
- (2) Security of supply; and
- (3) Competitiveness.

The Government recognise that Ireland must reduce greenhouse gas emissions from the energy sector by at least 80% by 2050, while at the same time ensuring security of supply of competitive energy sources to Ireland. The following national policy objectives (NPO) are of relevance to the proposed development:

NPO 61: *“Strengthen all-island energy infrastructure and interconnection capacity to enhance security of electricity supply, and explore the potential for strategic cooperation on offshore wind energy development.”*

NPO 69: *“Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions as expressed in the most recently adopted carbon budgets.”*

NPO 70: *“Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050.”*

NPO 71: *“Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.”*

The proposed development will make a substantial contribution to the achievement to assist in the reduction of greenhouse gas emission from the energy centre. The proposed development provides a flexible peaking plant which stabilises the grid when energy supply is low and promote the use of renewable energy in line with the National Planning Framework Plan and the National Policy Objectives contained within.

5.1 THE REGIONAL SPATIAL AND ECONOMIC STRATEGY FOR THE EASTERN AND MIDLANDS REGIONAL ASSEMBLY

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly (EMRA) were adopted by the Regional Assembly on 28th June 2019.

The RSES notes that the main energy networks in the Region are electricity and gas and it is important that the existing electricity and gas networks can be upgraded to provide for appropriate capacity. Regarding the Dublin Region, the RSES states the following:

“The Dublin Region is the major load centre on the Irish electricity transmission system. Approximately one third of total demand is located here, similarly the Eastern Region is a major load centre on the Irish transmission system. The main urban demand centres are composed of a mix of residential, commercial and industrial demand, which is expected to

grow up to 2025 and beyond. Developing the grid in the Region will enable the transmission system to safely accommodate more diverse power flows from renewable generation and also to facilitate future growth in electricity demand. These developments will strengthen the grid for all electricity users, and in doing so will improve the security and quality of supply. This is particularly important if the Region is to attract high technology industries that depend on a reliable, high quality, electricity supply.”

The proposed development is located in the Dublin Region and will strengthen the grid whilst providing stabilisation in periods of low energy supply. The proposed development plays a crucial role in minimising power outages and supplying an increase of renewable energy sources. Regional Policy Objective (RPO) seeks to:

“Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy. This Includes the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity and gas transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process”.

The proposed development contributes to the fulfilment of this objective, by providing for flexible generation within the Dublin Region which will enhance security of supply and strengthen the electricity system within the Region. It is therefore considered that the proposed development is consistent with the Regional Spatial and Economic Strategy for the Eastern and Midland Region.

5.2 CLIMATE ACTION PLAN 2025

The 2025 Climate Action Plan¹ ('CAP25' hereafter) was published on the 15th of April 2025 and is the third statutory annual update to Ireland's Climate Action Plan under the Climate Action and Low Carbon Development (Amendment) Act 2021.

CAP25 builds upon last year's Plan (CAP24) by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings. The Plan provides a roadmap for taking decisive action to halve Ireland's emissions by 2030 and reach net zero by no later than 2050, as committed to in the Climate Action and Low Carbon Development (Amendment) Act 2021. The plan aligns with the legally binding economy-wide carbon budgets and sectoral ceilings that were agreed by Government in July 2022.

The proposed development aligns with the CAP25 which sets a Key Target of the provision of at least 2 GW of new flexible gas plants by 2030.

Section 11 of CAP25 sets out Key Targets and Actions to achieve the aims of the Plan. A Key Target set out at the outset of this section is the delivery of at least 2 GW of electricity through the provision of New Flexible Gas Plans by 2030.

The proposed development of a gas fired power station to support the required level of emissions reductions identified in the Climate Action Plan and greater renewable penetration on the grid is in keeping with the objectives of the CAP25. The proposals would represent a significant contribution to the realisation of a leu objective of the Plan.

The delivery of flexible gas fired generation such as the proposed development, in line with the Climate Action Plan, will enable the retirement of inefficient and carbon intensive

¹ Dept of the Environment, Climate and Communications (April 2025) CAP25: [Climate Action Plan 2025](#)

generation assets on the national grid, and the wider rollout of renewable energy in the region and the State.

The role played by flexible gas fired generation stations such as the proposed development is to dispatch power to balance fluctuating electricity demand in the grid due to intermittent renewable supplies, as renewable energy generation is inherently intermittent due to weather conditions.

The delivery of the proposed development will make a significant (34%) contribution to the realisation of the 2GW target for new flexible gas plant set out in CAP25. CAP25 states the following:

“The electricity sector has one of the smallest carbon budgets, with a ceiling of 40 MtCO₂eq. for the first budget period (2021–2025), equating to an average of 8 MtCO₂eq. per annum and the steepest decline trajectory (-75%) across all sectors. This represents an immense challenge as the sector not only has a requirement to reduce emissions, but also to meet the increasing electricity demand required for our economy, ensuring the energy security of the State, and supporting those sectors which are decarbonising through electrification.

There has been a steady decline in annual emissions from 9.89 MtCO₂eq. in 2021 to 7.56 MtCO₂eq. in 2023. While the EPA Projections Report 2023–2050 indicates an overshoot of over 1 MtCO₂eq. in the period 2021 to 2025, and an overshoot of over 5 MtCO₂eq. in the second period 2026 to 2030, these are both significant improvements on the projected overshoots (5.2 MtCO₂eq. and 8.2 MtCO₂eq., respectively) set out in the Climate Action Plan 2024.”

The achievement of this target is crucial to facilitate the realisation of other national climate and energy targets, including the sourcing of electricity from 80% renewable sources by 2030, and avoiding the exceedance of the legally binding sectoral emissions targets for the electricity sector (the exceedance of which would result in substantial fines).

The delivery of a reliable and more sustainable electricity system for the State is also a key pre-requisite for economic development and stability, with employment and investment decisions on a supranational scale increasingly influenced by the availability of reliable and sustainable infrastructure such as electricity infrastructure.

5.2.1 CONSISTENCY WITH THE CAP

The Proposed Development is fully consistent with the aims, objectives, and Key Targets of the Climate Action Plan 2025. By delivering new flexible gas-fired generation capacity, the project directly supports Ireland’s transition to a renewable-led electricity system while maintaining system reliability and security of supply.

The proposal delivers essential capacity without reliance on coal or other higher-carbon fuels, thereby supporting emissions-reduction objectives while enabling greater renewable penetration on the national grid. In this regard, the Proposed Development represents an integral component of the State’s long-term pathway to a climate-neutral energy system, as envisaged under CAP25 and the Climate Action and Low Carbon Development (Amendment) Act 2021.

5.3 CLIMATE ACTION AND LOW CARBON DEVELOPMENT ACTS 2015 AND 2021

The proposed development directly addresses and will assist in achieving the aims of Section 15 of the Climate Action and Low Carbon Development Act 2015, as amended.

The first Climate Action and Low Carbon Development Act 2015 provided the statutory basis for the national goal of progressively pursuing a low carbon, climate resilient and environmentally sustainable economy by 2050.

In 2021 the Government passed the Climate Action and Low Carbon Development (Amendment) Act 2021 enshrining the target to achieve net zero emissions by 2050 and a 51% reduction in emissions by 2030 into law. The Act establishes a 2050 net zero emissions target compared to 1990 levels, and introduces a system of successive five-year carbon budgets starting in 2021.

The Climate Action and Low Carbon Development Act 2021 commits the Government to moving to a climate-resilient and climate-neutral economy by the end of 2050. It sets the commitment to achieve net zero emissions by 2050 and a 51% reduction in emissions by 2030. It introduces carbon budgets for the State, and sectoral emissions ceilings.

Section 15 of the Climate Action and Low Carbon Development Act 2015, as amended, states the following:

“(1) A relevant body shall, in so far as practicable, perform its functions in a manner consistent with—

- a) the most recent approved climate action plan,*
- b) the most recent approved national long term climate action strategy,*
- c) the most recent approved national adaptation framework and approved sectoral adaptation plans,*
- d) the furtherance of the national climate objective, and*
- e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.”*

This places a responsibility on Planning Authorities to consider the compliance of each Proposed Development with these criteria and to make decisions which are consistent with the listed policies in so far as practicable.

The criteria are addressed in turn below to assist the Planning Authority in considering the current application and in undertaking an Environmental Impact Assessment of the Proposed Development with cognisance of the above requirement of the Act.

The Climate Action Plan 2025 has been addressed above, with further details provided within Section 3.2.1, 9.9 and 9.3.1.2.2 of Chapter 9 (Climate) of the EIAR. In respect of the other items listed under section 15, we refer the Commission to the EIAR submitted as part of this SID application.

The Acts emphasise adaptation to climate impacts and this proposal maintains grid stability during periods of low renewable output.

This flexible gas-fired plant will provide essential peaking, which is critical for meeting renewable electricity targets without resorting to higher-emission fuels like oil or coal.

The EIAR has carried out a greenhouse gas emissions assessment and assessed the Proposed Scheme’s resilience/adaptation to climate change.

Chapter 9 of the EIAR states the following:

- *“Greenhouse Gas Emissions Assessment – This assessment considers the Proposed Development’s GHG emissions over its lifetime (see Section 9.5.2). The assessment analyses these emissions in the context of the relevant carbon budgets, targets and policies to ensure consistency with the most recent approved climate action plan and the most recent approved national long term climate action strategy, and with measures in furtherance of the national climate objective. This complies with subsections 15 (1) (a), (b), and (d) of the Act.*
- *Climate Change Vulnerability Assessment – This assessment identifies the impact of a changing climate on the Proposed Scheme and receiving environment in the context of the most recent approved national adaptation framework and approved sectoral adaptation plans. The assessment considers the Proposed Scheme’s vulnerability and adaption to climate change and identifies adaptation measures to increase resilience, as discussed in Section 9.5.3.2. This covers sections 15(1)(c) and (e) of the Act.*

The above measures pursue the furtherance of the national climate objective and the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State as far as practicable as required by section 15(1)(d) and(e) of the Acts.”

5.4 ENERGY SECURITY IN IRELAND 2030

The importance of providing dependable and flexible electricity supply is also highlighted in ‘Energy Security in Ireland to 2030’ (published in November 2023 by the Department of the Environment, Climate, and Communications). This government policy document states the following:

*“Our plans for the electricity system, focused on the addition of renewable generation, demand-side flexibility, **new gas-fired generation as flexible back-up**, interconnection and storage, are the right ones to secure our electricity supplies. We must focus on delivery and monitor and adjust our plans as we go.” [Emphasis added].*

The Government’s energy security package, Energy Security in Ireland to 2030, expanded on the Policy Statement on Security of Electricity Supply to establish a strategic approach to these policy objectives. With respect to the importance of back-up generation for a renewable energy transition, Action 7 of the package is *“To work within the updated European Market Design to continue to reduce emissions associated with Ireland’s conventional capacity over the medium term.”* It is stated that *“in recent years Ireland has seen the critical importance of this “back-up” [conventional] capacity – in particular in ensuring uninterrupted supplies of electricity to homes and businesses on low-sun, low-wind “dunkelflaute” days. This is an important component of energy security but also an important measure in building confidence in Ireland’s ability to securely transition to a majority renewable system.”*

This national policy document confirms that Ireland’s future energy security will be secured by moving to an electricity-led system that maximises indigenous renewable energy potential, underpinned by sufficient flexibility and firm capacity to ensure reliability at times.

The proposed development will directly assist in the improvement of security of energy supply.

5.5 CIRCULAR PL12/2021 – GOVERNMENT STATEMENT ON SECURITY OF ELECTRICITY SUPPLY²

Circular PL 12/2021, issued by the Minister of State for Planning and Local Government stated the following:

“Government has approved that:

1. the development of new conventional generation (including gas-fired and gasoil distillate-fired generation) is a national priority and should be permitted and supported in order to ensure security of electricity supply and support the growth of renewable electricity generation;

...”

The foregoing statement from Circular 12/2021 is of direct relevance to the proposed development and clearly indicates the national importance of the proposals.

5.6 POLICY STATEMENT ON SECURITY OF ELECTRICITY SUPPLY, NOVEMBER 2021

This states that the Programme for Government requires a 51% reduction in greenhouse gas emissions by 2030 and that 80% of electricity consumption will come from renewable sources by 2030. Ensuring energy security is a national priority, as the electricity system decarbonises towards net zero emissions.

5.7 NATIONAL ENERGY SECURITY FRAMEWORK, APRIL 2022

This sets out the Governments response to the impacts of the war in Ukraine on the energy system in Ireland. Para. 2.3.3 (Electricity) states that: *“The level of dispatchable electricity generation capacity (i.e., capacity that does not rely on wind or solar energy) needs to increase significantly over the coming years due to the reduced reliability of existing plants, anticipated new power stations not being developed as planned, expected strong growth in demand for electricity, and the closure of existing generation.”*

² Dept of Housing, Local Government and heritage (2021) Circular PL 12/2021 - Government Policy Statement on Security of Electricity Supply: <https://www.gov.ie/en/department-of-housing-local-government-and-heritage/circulars/circular-pl-122021-government-policy-statement-on-security-of-electricity-supply/>

6.0 LOCAL PLANNING POLICY CONTEXT

6.1 FINGAL COUNTY DEVELOPMENT PLAN 2023-2029

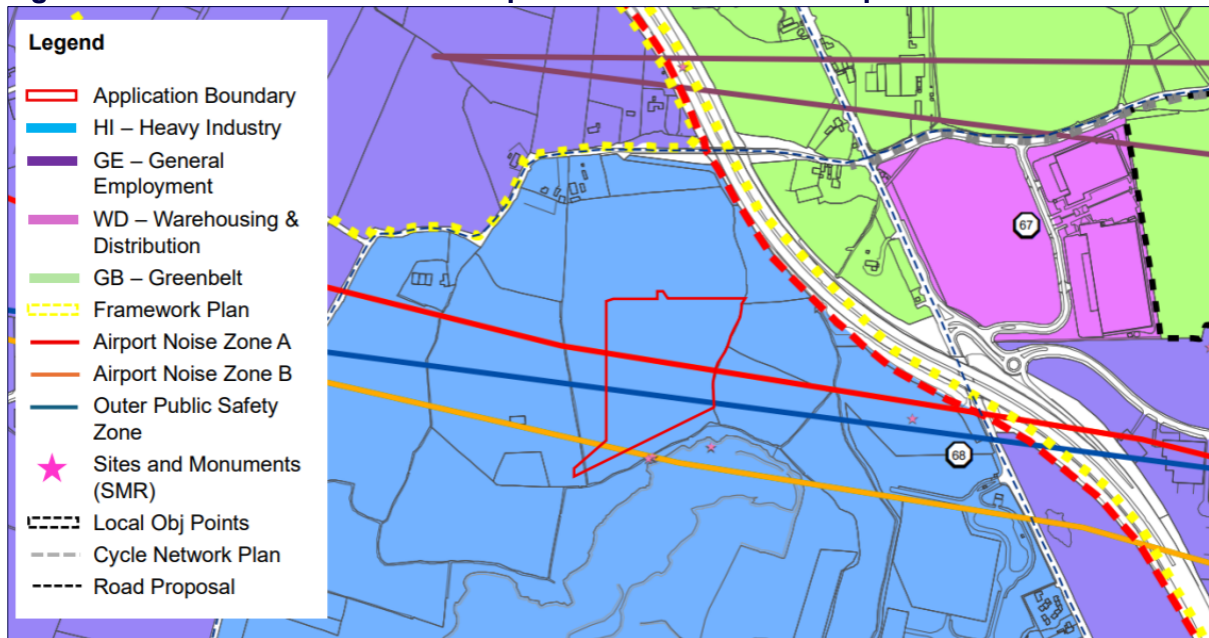
This subject site is located within the administrative area of Fingal County Council and development should accord with the policies and objectives set out within the Fingal Development Plan 2023-2029 (Development Plan).

Figure 7.1 below is an extract from the zoning map for this area, as per Map Sheet 12 of the Development Plan, and illustrates the zoning and the approximate site boundary of the subject site.

6.2 LAND USE ZONING

The subject site is located within lands zoned HI – Heavy Industrial. The objective for this zoning is to “provide for heavy industry”.

Figure 6.1: Extract from FCC Development Plan 2023-2029 Map Sheet 12



Source: Extract from FCC Development Plan 2023-2029 Map Sheet 12

The proposed development represents a “Utility installations” use, which is permissible under the relevant HI zoning objective. Utility installations, as defined within the Development Plan as “a structure composed of one or more pieces of equipment connected to or part of a structure and/ or a facility designed to provide a public utility service such as the provision of heat, **electricity**, telecommunications, water or sewage disposal and/or treatment.” [JSA Emphasis added].

6.2.1.1 Noise

The application site is partly located in Airport Noise Zoned A, B and C. The following Objectives are of relevance:

“Objective DAO11 – Requirement for Noise Insulation

Strictly control inappropriate development and require noise insulation where appropriate in accordance with Table 8.1 above within Noise Zone B and Noise Zone C and where necessary in Assessment Zone D, and actively resist new provision for residential

development and other noise sensitive uses within Noise Zone A, as shown on the Development Plan maps, while recognising the housing needs of established families farming in the zone. To accept that time based operational restrictions on usage of the runways are not unreasonable to minimise the adverse impact of noise on existing housing within the inner and outer noise zone”.

“Objective DAO13 – Aircraft Operations and Noise

Ensure that aircraft-related development and operation procedures proposed and existing at the Airport consider the requirements of the Aircraft Noise Regulations, the Noise Abatement Objective (NAO) for Dublin Airport, the Noise Action Plan, Health Issues and all measures necessary to mitigate against the potential negative impact of noise from aircraft operations (such as engine testing, taxiing, taking off and landing), on existing established residential communities, while not placing unreasonable, but allowing reasonable restrictions on airport development to prevent detrimental effects on local communities, taking into account the EU Regulation 598/2014 (or any future superseding EU regulation applicable) having regard to the ‘Balanced Approach’ and the involvement of communities in ensuring a collaborative approach to mitigating against noise pollution”.

The application proposes a development in which is not noise sensitive and which is not of a nature which requires insulation from noise. It will not impact on the operation of the airport.

The noise output of the proposed development has been considered in the EIAR.

6.2.2 Safety

The majority of the development proposed is located within the Outer Public Safety Zone.

Objective DAO19 outlines that guidelines to control development in these areas have not been published by Government. Until such time as such guidelines are published, the Council will continue to follow the advice of the Irish Aviation Authority regarding the effects of proposed development on the safety of aircraft and the safe and efficient navigation thereof.

In the outer public safety zone, employment densities of up to 110 persons per half hectare of development are applicable based on the 2005 ERM report. This measure is based on the measurement of density within any given half hectare of a development (i.e. a development is judged based on the densest half hectare within its boundary).

Once operational, there will be no significant employment on site, with occasional maintenance of the development required. Therefore, the proposals accord with the employment densities set out above. The density of occupation will fall significantly below 110 persons per half hectare.

We note the previously granted permission on the same landholding for a power generation station with an output of up to 293MW from FCC and An Coimisiún Pleanála (FCC Reg. Ref. FW22A/0204 & ABP Reg. Ref.: 317480).

With regard to land use zoning and a proposed gas power station, An Coimisiún Pleanála Inspector’s Report states:

“Industry – High Impact’ and ‘Utility Installations’ are ‘permitted in principle’ uses under the land use zoning and would reflect activities of a similar nature to that of the current proposed development. With reference to the zoning objective and vision for the site, and in consideration of the proposed use, I am satisfied that the proposed gas power station use of the site is compatible with the land use zoning.”

The principle of development is established on the lands to the north of which An Coimisiún Pleanála noted the proposed gas power station use would be compatible with the land use zoning designation of the site. It is considered that the same principle should be applied to the proposed development and accords with the ‘HI – Heavy Industry’ zoning objective set out within the Development Plan.

6.3 GREEN INFRASTRUCTURE AND NATURAL HERITAGE

6.3.1.1 Green Infrastructure

The application proposes development on a greenfield site. The following policies and objectives are of relevance.

“Policy GINHP1 – Resilient Design

Promote an awareness of the benefits of resilient design and the multi-functional nature of green infrastructure. Apply multi-functional principles of green infrastructure to inform the Development Management process in terms of design and layout of new residential areas, business/industrial development and other significant projects while maximising the multi-functional nature of green infrastructure by ensuring the development of synergies between Public Open Space, Biodiversity, SuDS/Water Sensitive Design, Climate Change and Active Travel objectives”.

“Policy GINHP2 – Protection of Green Infrastructure

Ensure that areas and networks of green infrastructure are identified, protected, enhanced, managed and created to provide a wide range of environmental, social and economic benefits to communities”.

“Policy GINHP3 – Greening of Developments

Encourage measures for the ‘greening’ of new developments including the use of green roofs, brown roofs, green walls and water harvesting. Where feasible require new developments to incorporate greening elements such as green roofs, brown roofs, green walls, green car parking and SuDs (e.g. clean water ponds fed by rainwater via downpipes)”.

The proposals incorporate planting and landscaping across the site to promote biodiversity and increase screening of the proposed development. Please refer to the accompanying landscape architectural pack and the biodiversity chapter of the EIAR for further details.

6.4 ENERGY INFRASTRUCTURE

The Development Plan supports the provision of energy infrastructure and states the following:

“A secure and resilient supply of energy is critical to a well-functioning region. Over-reliance on non-indigenous supplies of energy is still a major issue for Fingal and the Eastern Region. Energy generation and energy related activity in Fingal is likely to change significantly over the coming years as the move to a low carbon economy increases.”

The proposed development comprises flexible gas-fired generation to support the transition of the energy system to a greater percentage of renewable sources, while providing for security of energy supply. This is further supported by Section 11.4 of the Development Plan:

“Facilitate and promote the development of energy networks to facilitate sustainable growth and economic development and support the transition to alternative, renewable, decarbonised and decentralised energy sources, technologies and infrastructure. The Council will continue to support the development of a safe, secure and reliable supply of electricity and encourage the development of enhanced electricity networks, facilitating new transmission infrastructure projects under EirGrid’s Grid Development Strategy.”

The following policies and objectives are of relevance to the proposed development:

Policy IUP29: *“Work in partnership with existing service providers, businesses and local community groups to facilitate required enhancement and upgrading of existing infrastructure and networks and support the development of new energy systems, local community sustainable energy generation projects and transmission grids, which will be necessary for a more distributed, renewables-focused energy generation system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave, and solar energy.”*

Policy IUP31: *“Support... the Government’s Policy Statement on Security of Electricity Supply November 2021 and any subsequent plans prepared during the lifetime of this Plan, to provide for the safe, secure, and reliable supply of electricity.”*

Objective IUO44: *“Support the development of enhanced electricity and gas supplies, and associated transmission and distribution networks, to serve the existing and future needs of the County, and to facilitate new transmission infrastructure projects and technologies.”*

Chapter 11 ‘Infrastructure and Utilities’, Section 11.7, states, *“Fingal... will support new w infrastructure projects and technologies with particular emphasis on renewable, alternative, and decentralised energy sources, and those which are less carbon intensive in line with the Electricity and Gas Networks Sector Climate Change Adaptation Plan 2019. We will continue to support the development of a safe, secure, and reliable supply of electricity and to support the development of enhanced electricity networks and facilitate new transmission infrastructure projects including those under EirGrid’s Grid Development Strategy, to service the existing and future needs of Fingal and the wider Eastern Region and to strengthen all-island energy infrastructure and interconnection capacity.”*

The proposed development is in accordance with policies and objectives contained within the Development Plan.

7.0 OTHER PLANNING CONSIDERATIONS

7.1 LANDSCAPE AND VISUAL IMPACT

The Development Plan sets out a Landscape Character Assessment of the County. The proposed development is located in a landscape character area of 'low lying agricultural' lands which is defined as follows:

“Low Lying Character Type has an open character combined with large field patterns, few tree belts and low roadside hedges. The main settlements located within the area include Oldtown, Ballyboghil and Lusk and parts of Malahide and Donabate. Dublin Airport is located in this area. This low-lying area is dominated by agriculture and a number of settlements. The area is categorised as having a modest value. It contains pockets of important value areas requiring particular attention such as important archaeological monuments and demesnes and also the Feltrim Hill and Santry Demesne proposed Natural Heritage Areas.”

As part of the Environmental Impact Assessment Report (EIAR), a Landscape and Visual Impact Assessment (LVIA) was undertaken by AWN Consulting Ltd which assesses nearby landscape and visual receptors of which the proposed development may impact.

The LVIA concludes that the construction phase of the proposed development will only result in *“moderate and moderate-slight”* impacts which will be considerably reduced beyond 500-1000m of the site and overall the residual effects of construction stage are not deemed significant.

During the operational phase, the proposed development will result in slight or imperceptible impacts with only medium impact within less than 500m from the subject site. Overall, the proposed operational phase will not result in any significant residual effects.

For further information on potential visual impacts, please refer to Chapter 11 of the EIAR prepared by AWN Consulting Ltd and submitted as part of this application.

7.2 ENVIRONMENTAL CONSIDERATIONS

An Environmental Impact Assessment Report (EIAR), including a Non-Technical Summary, has been prepared by AWN Consulting Ltd and other specialist consultants, and is submitted as part of this planning application. The Cover Letter prepared by JSA Planning includes an appended confirmation from the EIA Portal which was received within the period of two weeks prior to the lodgement of the application.

An Appropriate Assessment Screening Report, prepared by AWN Consulting Ltd, is submitted and accompanies this planning application. The AA Screening Report concludes that it is not necessary to undertake any further stage of the Appropriate Assessment Process, however it will be for the Planning Authority, as competent authority, to carry out screening for Appropriate Assessment on the proposals.

8.0 CONCLUSION

This application is made under Section 37 of the Planning and Development Act 2000 (as amended), on behalf of the prospective applicant Kilshane Energy Ltd. The proposed development comprises a 680MW peaking plant power generation station. The proposal will comprise 2 no. open cycle gas turbines (OCGT), each with an output of up to 340MW, along with ancillary structures, and services. A 400kV GIS building will be located to the northwest section of the site and a temporary access road will be constructed to the northwest section of the site.

The proposal is in accordance with the policies and objectives of the national and regional planning policy, and the Fingal County Development Plan 2023-2029.

It has been demonstrated within this report, as well as within the accompanying drawings documents, and Environmental Impact Assessment Report, that the proposal provides a suitable use of the subject lands. The applicant and design team in preparing the application documentation have considered issues raised within the pre-application consultations undertaken with An Coimisiún Pleanála and their determination issued prior to the lodgement of this application.

If you require any further information, or clarification on the foregoing, please do not hesitate.



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