

The Secretary,
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1.

Date: 20th August 2026
Ref.: JN 24219

Re: Response to Submissions in Relation to a Planning Application for a Strategic Infrastructure Development Comprising a 680 MW Gas-Fired Generation Station at Kilshane Road, Kilshane, Finglas, Dublin 11 (ACP-324305-26)

Dear Sir / Madam,

We, JSA Planning (the Agent), on behalf of Kilshane Energy Ltd. (the Applicant), Unit 8 CTEK, Riverside Road, Carrickmacross, Co. Monaghan, A81 XF29, and further to correspondence received from An Coimisiún Pleanála on the 10th August 2026, hereby submit this letter responding to the 3 no. third-party submissions received by the Commission in relation to the Strategic Infrastructure Development (SID) Application under the ACP Ref: ACP-324305-26, for the construction of a 680 MW gas-fired generation station at Kilshane Road, Kilshane, Finglas, Dublin 11.

Introduction

The development was described as follows in the public notices submitted with the SID application:

"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."

This current third-party submission response is submitted in reply to correspondence received from the Commission dated the 10th August 2026.

Three no. submissions were made to the Commission in relation to this SID Application:

- DAA (09/07/2026);
- Transport Infrastructure Ireland – Land Use Planning Unit (15/07/2026); and
- Development Applications Unit, Department of Housing, Local Government and Heritage (21/07/2026).

A copy of the letter from the Commission inviting a response to the third-party submissions is attached as Appendix 1 of this response document. This response is submitted in advance of the deadline for responding (i.e. 5:30pm on the **7th September 2026**).

This document provides a coordinated response to all points raised within the third-party submission. This document includes input from the applicant and the project Landscape Architects where relevant. The overall response has been co-authored and coordinated by JSA Planning.

Response to Points Raised within the Submissions

Dublin Airport Authority (DAA)

The Applicant notes the observation submitted by DAA in relation to cumulative aviation impacts and crane operations.

The aviation and aerodrome safeguarding implications of the proposed development were considered in detail during the pre-application stage. The Applicant commissioned Straten CSL to undertake a Future Phase Development Study specifically addressing the aviation implications of the proposed development (comprising two additional gas turbines), including the relationship with the permitted Phase 1 development.

The resulting report, Future Phase Development Study – Kilshane Power Plant (Ref. 110KIL002, Version 2.1, dated 20 February 2025), was submitted with the application and uploaded to the project website¹ (please refer to Appendix 2 for a copy of this report) and addresses the relevant aviation safeguarding, operational and cumulative considerations.

The findings of the report were subsequently reviewed by AirNav Ireland in consultation with DAA. In its correspondence dated 8 April 2025, AirNav Ireland confirmed that:

"It is accepted that the Instrument Flight Procedures and the Obstacle Limitation Surface at Dublin Airport are not affected by the proposed additional two power plants construction..."

A copy of the correspondence from AirNav Ireland was also included in the application and on the project website², and is reproduced in Appendix 3 for reference.

AirNav Ireland also confirmed the applicable stack height restrictions for Phase 2 and Phase 3 and noted that a craneage condition would be expected as part of any grant of planning permission.

The Applicant therefore considers that the aviation matters raised by DAA have been appropriately addressed through the pre-application engagement, the aviation assessment undertaken by Straten CSL and the subsequent confirmation provided by AirNav Ireland.

The Applicant respectfully requests that the Commission accepts the submitted aviation assessment and AirNav Ireland correspondence as addressing the matters raised by DAA and that no further aviation assessment is required.

Crane Operations

The Applicant acknowledges the request from DAA regarding crane operations and confirms that it is willing to accept a condition attached to any Order to grant permission requiring crane operations associated with the development to be agreed with DAA and AirNav Ireland at least 90 days in advance of the proposed crane operations

¹ Link: <https://www.kilshanephase2sid.com/pdfs/planning-documents>

² Link: <https://www.kilshanephase2sid.com/pdfs/planning-documents>

Transport Infrastructure Ireland

The submission by Transport Infrastructure Ireland (TII) at the outset acknowledges and welcomes the fact that the proposed development will support the delivery of the objectives of the National Planning Framework, and in particular National Strategic Outcomes 8 and 9 of the NPF. The applicant welcomes this acknowledgement.

Traffic Management

The TII submission requests the inclusion of a condition requiring the submission and agreement of a detailed Traffic Management Plan, subject to the agreement of TII.

The applicant is willing to accept a condition in relation to the submission and agreement of a Traffic Management Plan prior to the commencement of development. However, it should be noted that the proposed development (which represents a further phase of an already permitted and under construction development to the north), does not propose any direct impact on National Roads under the remit of TII, and the currently proposed development will directly connect to roads and infrastructure already consented to the north.

Abnormal Loads

The TII submission also proposes a condition pertaining to abnormal loads requiring access to the site. The applicant would welcome a condition of the nature set out by TII in this regard, and it is noted that the applicant will be engaging with the Roads Authorities in relation to the already permitted Phase 1 development to the north in respect of abnormal loads associated with that development.

Development Applications Unit, Department of Housing, Local Government and Heritage

The submission of the Development Applications Unit (DAU) focuses on matters relating to archaeology and nature conservation. Conditions in respect of each are suggested, and these are addressed below.

Archaeology

The DAU submission sets out several suggested conditions relating to archaeology, which the applicant is generally willing to accept as part of any grant of permission for the proposed development.

The first suggested condition seeks to require the implementation of the mitigation measures set out within the archaeology and cultural heritage chapter of the submitted EIAR. The applicant is committed to these mitigation measures, however generally all mitigation in the EIAR would be conditioned to be carried out, and even in the absence of such a condition, the mitigation would be required to be implemented when carrying out the development.

The remaining suggested archaeology conditions relate to monitoring, undertaking any further mitigation required by the Planning Authority and / or the National Monuments Service, the inclusion of archaeological constraints within the construction stage CEMP, and the submission of a final archaeological report to the National Monuments Service. The applicant would welcome conditions of this nature attached to any grant of permission.

Nature Conservation

The DAU's consideration of nature conservation notes that, provided the development is implemented in accordance with the proposed mitigation, then *"it is unlikely that any significant adverse effects on fauna, flora or ecologically valuable habitats will result from the proposed power plant's development"*

This acknowledgement is welcomed by the applicant.

The remainder of the submission in respect of Nature Conservation focuses on the inclusion of wildflower meadow within the landscaping scheme for the development, and raises several points with regard to the use of seeds of non-local origin.

A condition is suggested to require that commercially sourced wildflower seeds be omitted from the landscaping scheme, in favour of *"germination of wildflowers from the existing site soil seed bank or natural dispersal and the maintenance of these meadows by implementing an appropriate future mowing regime"*.

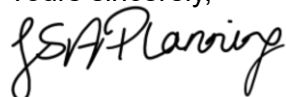
This approach has been reviewed by the project landscape architects and the applicant, and it is confirmed that the applicant will commit to this approach instead of using commercially sourced wildflower seeds, in order to conserve the genetic diversity of locally occurring wildflower populations. A condition to this effect would be acceptable if required.

Conclusion

This response to the submissions on the current SID application is submitted on behalf of the Applicant, Kilshane Energy Ltd., Unit 8 CTEK, Riverside Road, Carrickmacross, Co. Monaghan, A81 XF29, in relation to the Strategic Infrastructure Development (SID) Application under the ACP Ref: ACP-324305-26, for the construction of a 680 MW gas-fired generation station at Kilshane Road, Kilshane, Finglas, Dublin 11.

We trust the Commission will afford the responses set out herein due consideration in determining the application. Should you require any queries or require any further information please do not hesitate to contact the undersigned.

Yours sincerely,



JSA Planning

Enclosures:

- Appendix 1 – Correspondence received from An Coimisiún Pleanála dated 10th August 2026.
- Appendix 2 - Future Phase Development Study – Kilshane Power Plant
- Appendix 3 – AirNav Ireland Correspondence

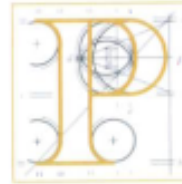
Submission Response Details

Applicant Name	Kilshane Energy Ltd.
Applicant Address	Unit 8 CTEK, Riverside Road, Carrickmacross, Co. Monaghan, A81 XF29
Applicant's Agent's Name	JSA Planning
Applicant's Agent's Address	39 Fitzwilliam Place, Dublin 2, D02 ND61
Third-Party Submitters	DAA (daa plc, Three, The Green, Dublin Airport Central, Dublin Airport, Swords, Co Dublin, K67 X4X5) Transport Infrastructure Ireland – Land Use Planning Unit (Parkgate Business Centre, Parkgate Street, Dublin 8, D08 DK10, Ireland) Development Applications Unit, Department of Housing, Local Government and Heritage (Government Offices, Newtown Road, Wexford, Co Wexford, Y35 AP90)
An Coimisiún Pleanála Reference	ACP-324305-26

Appendix 1 – Correspondence received from An Coimisiún Pleanála dated 10th August 2026

Our Case Number: ACP-324305-26

Your Reference: Kilshane Energy Limited



An
Coimisiún
Pleanála

JSA Planning
39 Fitzwilliam Place
Dublin 2
D02ND61



Date: 10 August 2026

Re: Proposed development of a 680MW Gas-Fired Generation Station
at Kilshane Road, Kilshane, Finglas, Dublin 11 (www.kilshanephase2sid.com)

Dear Sir / Madam,

I have been asked by An Coimisiún Pleanála to refer further to the above mentioned case.

Three submissions have been received by the Commission in relation to the above mentioned case. These submissions are available for inspection on the Commission's website at the following link: <https://www.pleanala.ie/en-ie/case/324305>.

1. DAA
2. Development Applications Unit
3. Transport Infrastructure Ireland

The Commission hereby considers it appropriate to invite you to make a submission on the observations received in relation to the application. Please be advised that any response to the Commission's invitation should not contain any additional reports or supplementary reports and should be confined to the issues raised in the observations received by the Commission. Any submission in relation to the above must be received by the Commission within 4 weeks from the date of this letter (i.e. not later than **7th of September 2026**).

If you have any queries in relation to the matter please contact the undersigned officer of the Commission.

Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Ellen Moss
Executive Officer
Direct Line: 01-8737285

PA08

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