KPMG Future Analytics

Preliminary Planning Statement

For: SID Determination Request

Proposed 385 MW Open Cycle Gas Turbine (OCGT) Plant at the existing Barrigone Quarry Site at the Roadstone Barrigone Quarry, Askeaton, Co. Limerick.

June 2026

Document review and approval

Revision history

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1.0 Introduction

1.1 Overview

KPMG Planning of 1 Stokes Place, Dublin 2 have been instructed by Cultaca Limited of 25 North Wall Quay, Dublin 1, D01 H104 to prepare this Preliminary Planning Statement to accompany this Pre-SID determination request for the proposed scheme of an Open Cycle Gas Turbine (OCGT) electricity-generating plant with a gross electrical output of up to 385 MW along with associated buildings, plant, site works, services and all ancillary development on lands at the Roadstone Barrigone Quarry, Askeaton, Co. Limerick.

As per the *Guidelines for Applicants* published on the ACP website, please note the following:

- The **prospective applicant** is Cultaca Limited. The registered address of Cultaca Limited is 25 North Wall Quay, Dublin 1, D01 H104
- The main **Point of Contact**, who should receive all correspondence in relation to this submission is – Stephen Purcell – Director and Co-Head of KPMG Planning. Phone Number: +353 87 63 44 507 or email stephen.purcell@kpmg.ie.
- A **general description** of the nature and scale of the proposed development, including drawings are provided in Section 5 below.
- The **address of the proposed development** and a brief description of the site and surrounding area are provided in Section 2 below.
- The **planning authority** in whose functional area the site is situated is Limerick City and County Council (LCCC).

The planning statement is accompanied by the **following documents** in support of this pre-application request:

- A Site location map (Drawing No. OCGT-ROD-BAR-XX-SK-CE-0001) - showing the boundaries of the site prepared by Roughan & O'Donovan Consulting Engineers;
- A Site layout plan (Drawing No. OCGT-ROD-BAR-XX-SK-CE-0002) – showing the general arrangement and description of the proposed development prepared by Roughan & O'Donovan Consulting Engineers;
- A wider Site Location Map (Drawing No. OCGT-ROD-BAR-XX-SK-CE-0003) - showing the boundaries of the site prepared by Roughan & O'Donovan Consulting Engineers;
- An Engineering Preliminary Report prepared by Roughan & O'Donovan Consulting Engineers;
- A Letter of Consent from Belgard Estates Limited, dated the 13th of May 2026.
- An EFT Payment (Ref No. 240556887) was made to An Coimisiún Pleanála for the appropriate amount of €4,500.

The purpose of the planning statement is to provide an overview of the proposed development and to set out the context and need for the development proposed scheme of an (OCGT) electricity generating Plant.

It is considered that the proposed development falls within the scope of Section 37(A) of the PDA. A statement is included as to why the prospective applicant considers the proposed development should be regarded as SID, in accordance with the criteria set out in section 37(A) of the PDA. An overview of relevant legislative provisions and precedents of note to the determination on whether the proposed development does or does not constitute Strategic Infrastructure Development (SID) is also provided.

2.0 Subject Site

2.1 Site Location

The subject site is located within the existing Roadstone Barrigone Quarry at Askeaton, Co, Limerick. The subject site measures approx. 4ha; and lies within the administrative area of Limerick County Council and occupies a strategically positioned location approximately 4.2km west of Askeaton, and 4km southeast of Foynes. The site is located south of the N69 National Road, and access to the site is provided via a 150m access road off the N69. The subject site is well screened by existing planting and vegetation.

The site comprises an existing quarry operation which has been operating on a campaign basis for a number of years. There is an existing void on site, with limestone extraction having taken place since at least 1975. Associated quarry infrastructure also exists on site and includes internal roads, site office, weighbridge, wheelwash, concrete plant and welfare facilities.

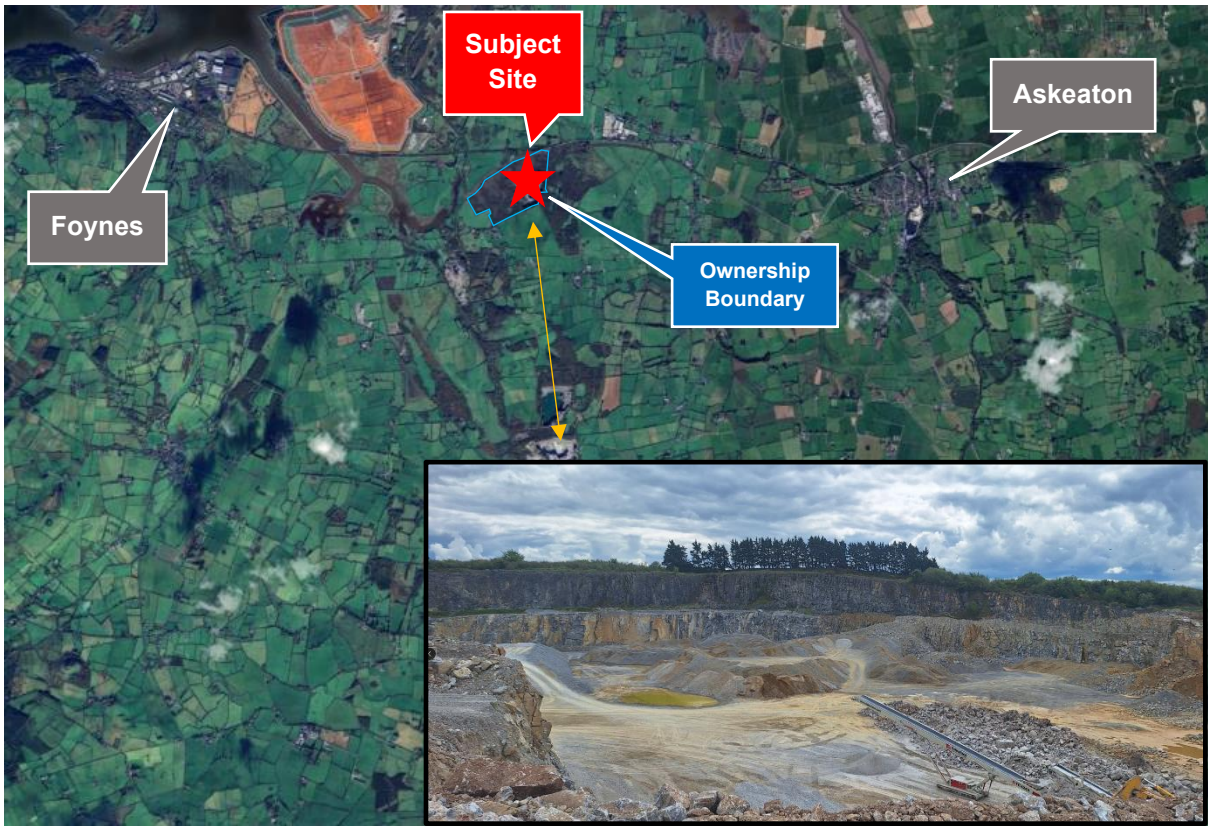

Figure 2-1 Location of subject site in the context of surrounding towns (Subject land outlined in red & applicant ownership outlined in blue).

Galtee Fuels Ltd. coal storage is located approximately 650m to the southwest of the site, Goulding Fertiliser Askeaton is located approximately 825m to the northeast of the site and Rusal Aughinish Ltd is located approximately 1.2km to the northwest of the site at its closest point.

On a wider scale the site is set within an area predominately made up of large industry, other pits and quarries and agricultural fields. There are also several one-off residential properties and farms surrounding the wider site along the local road network.

Figure 2-2 OCGT site application area entrance along the N69.

2.2 Site Description

The lands form part of an established industrial resource area – the Roadstone Barrigone Quarry at Askeaton. The application site is accessed via a 150m access road along the N69 National Road. Existing hedgerows and trees around the periphery of the site mean that the site is well screened by existing established planting.

Figure 2-3 OCGT site application area outlined in red.

The nearest surface water feature to the site is the Glenbane West Stream, which is located approx. 330m to the north east of the site, and is separated from the site by agricultural fields, a railway line and

the N69. Based on a review of Floodmaps.ie, the site is not designated within Zone A or Zone B for Flood Risk, however, a Site-Specific Flood Risk Assessment will accompany the planning application.

With regards to the Natura 2000 network, the subject site is not located within any protected area. The proposed development is located adjacent to the Barrigone SAC (Site Code: IE0000432) and Barrigone pNHA (Site Code: IE0000432). The site is located approx. c.750 east of the River Shannon and River Fergus Estuaries SPA (Site Code: IE00004077), and 1km south of the Lower River Shannon SAC (Site Code: IE00002165). An AA Screening Report and Natura Impact Statement will accompany the planning application.

It is noted that there are numerous ringforts surrounding the site, and an Archaeological Impact Assessment Report prepared by ACSU will accompany the planning application.

The following lists NIAH registered structures and monuments in close proximity to the subject site:

- **NIAH Ref. LI010-089:** A Ringfort-Rath located 10m to the south of the site;
- **NIAH Ref. LI010-092:** An Enclosure located 160m to the east of the site;
- **NIAH Ref. LI010-085:** A Ringfort-Rath located 300m to the west of the site;
- **NIAH Ref. LI010-083:** A Ringfort-Rath located 350m to the south west of the site;
- **NIAH Ref. LI010-086:** A Ringfort-Rath located 400m to the south west of the site;
- **NIAH Ref. LI010-093:** A Ringfort-Cashel located 310m to the south of the site; and
- **NIAH Ref.LI010-123:** A Ringfort-Rath located 280m to the east of the site.

Figure 2-4 Location of the Subject Site in relation to Protected Structures and Monuments

2.3 Land ownership

A Letter of Consent from Belgard Estates Limited dated the 13th of May 2026 is submitted herewith

3.0 Relevant Planning History and Related Developments

This section presents the planning history for the site (Section 3.1) and presents information on similar precedent developments of relevance to this application for an Open Cycle Gas Turbine electricity generating Plant (Sections 3.2 & 3.3).

It also provides a summary of neighbouring large scale energy projects that demonstrates that along with the context of quarries in the area, that the locality has an established record of accommodating large-scale energy, infrastructure and extractive industry developments, including Strategic Infrastructure Development.

3.1 Subject Site

The application site forms part of the wider Roadstone Ltd quarrying operations at Barrigone Quarry. The quarry specialises in extracting limestone, processing limestone into graded aggregates for supply and sale to meet local and regional demand across a range of projects. The subject site was granted planning permission by Limerick County Council (LCC) in 1975 for the development of a quarry and concrete plant.

LCC Reg. Ref. 2560020: On the 6th of November 2025, LCC granted permission to Roadstone Limited for the following on a 17.44 hectare site:

a) The infilling and restoration of the existing quarry void over an area (c. 4.1 ha) of existing permitted quarry (05/7029 and ABP 13.QC.2098) using approximately 450,000m³ or 810,000 tonnes of inert soil and stone waste or soil and stone by-product.
b) The development will consist of the restoration of the void with either: 1) Inert soil and stone waste (imported inert greenfield and non-greenfield soils and stone, and river dredge spoil) which will result in the Proposed Development operating as a soil recovery facility that requires a waste management licence from the EPA; or, 2) Soil and stone by-product (i.e. essentially virgin soil or equivalent to virgin soil and stone) which will be notified to the EPA as an Article 27 by-product at its source of origin and transported as a by-product material to enable the Site to be restored. The Site would then operate under conditions of planning.
c) The proposed development will utilise the permitted quarry infrastructure including internal roads, site office, weighbridge, wheel wash, welfare facilities and other ancillaries to complete the works.
d) Upgrades to the existing weighbridge and wheel wash facilities.
e) Construction of a soil inspection shed (approximately 120m² in area, 4m height) and refuelling area (hardstanding) located to the west of the existing site office (approximately 16m² hardstanding area).
f) Associated minor works to include site access road improvements, upgrade of drainage infrastructure including new fuel/oil interceptor and surface drains on hardstanding.
g) All ancillary and associated works.

In the Planner's Report assessment of the project, it concluded that *'having regard to policies and objectives of the Limerick Development Plan 2022-2028, the planning history and the plans and particulars submitted with the application, as well as the strategic importance of the quarry site in relation to the construction industry and the Limerick area, it is considered that the proposed development is in accordance with the proper planning and sustainable development of the area'.*

LCC Reg. Ref. 23294: On the 9th of May 2024, LCC refused permission for the restoration and infilling of the existing and future void over an area of (c. 17.2 ha) of the existing Barrigone quarry. Permission was refused for the following reason:

> *'The proposed entrance and roadside boundary works are located within the Barrigone SAC site code 000432. Having regard to Policy EH P1 Protection of Natural Heritage and Biodiversity*

as set out in the Limerick Development Plan 2022-2028m the Natura Impact Assessment as submitted has failed to demonstrate that the proposed development as a whole would not have a significant impact on the Barrigone SAC and its qualifying interests. In the absence of an assessment of the additional works proposed to the entrance and roadside boundary, the Planning Authority cannot be satisfied that the proposed development individually or in combination with other plans or projects would not result in adverse affects on the integrity of the Barrigone SAC in view of the sites conservation objectives.'

The quarry was registered under the Section 261 registration process and LCC issued revised conditions under planning permission number 05/7029. This decision was subject of a First Party appeal to ABP. A decision was made by ABP (Ref: 13.QC.2098) on the 12th of March 2008 to grant permission where all relevant conditions from planning register reference number 75/10227 shall apply, except where modified by the conditions in planning permission number 057029 and ABP 13.QC.2098. Under Section 261A assessment (permission number 12/9026) no further action was required. Other planning applications relating to the operation of the quarry include:

LCC Reg. Ref. 8829078: On the 21st of October 1988 LCC granted permission to Roadstone Limited for the provision of a sand drying plant.

LCC Reg. Ref. 8828977: On the 30th of September 1988, LCC granted permission to Roadstone Limited for the installation of an Asphalt Plant.

LCC Reg. Ref. 951019: On the 27th of October 1995, LCC granted permission to Clongrennane Limited for the erection of a lime kiln and all ancillary works.

3.2 Precedent Decisions

The following lists recent decisions granted for both SID and non-SID Open Cycle Gas Turbines across the country. Having regard to the nature of the proposed development, a review of similar development applications nationally has been undertaken.

The review identified a number of relevant proposals which highlighted the importance of:

- Compliance with European, National and Local Policy on Energy Security and Renewable Energy; and
- Robust environmental assessments, including climate, air, biodiversity, landscape and visual, noise, water, and traffic and transport impacts.

Overall, the review demonstrates that peaker power plant developments are recognised for their important role in the net-zero transition and are generally considered acceptable in principle on both brownfield sites and lands designated for infrastructure development.

This is relevant to the proposed development as the site is located within the lands of the former Barrigone Quarry which has a history of industrial and extractive use and would be an important re-use of the former quarry site.

3.2.1 Kerry

ACP Ref. 318540: On the 4th of October 2024, ACP granted 10-year permission for an Open Cycle Gas Turbine (OCGT) power plant fuelled by Hydrotreated Vegetable Oil (HVO) and associated site works at Tarbert Island, Co. Kerry. Given the scale of this development, it was an SID development and included an EIAR.

In their assessment the Inspectors Report concluded that the *'proposed development is supported by Local, European, National and Regional policy in relation to moving from an oil, peat, coal and gas-based energy system to an electricity-led system maximising our renewable energy potential, specifically with the use of new gas-fired generation as flexible back-up…would contribute to the achievement of European and national renewable energy targets.'*

3.2.2 Meath

Meath County Council Ref. 2360212: On the 15th of February 2024 MCC issued a notification of decision to grant permission for the development of a 170MW Open Cycle Gas Turbine (OCGT) Power Plant to be powered using Hydrotreated Vegetable Oil (HVO) and all associated site development works at Carranstown, Duleek for SSE Generation Limited.

Given the size of the plant the site (under 300MW) an EIAR was not required, and the project was not considered SID. The application was appealed to An Coimisiún Pleanála under Ref. 319278.

ACP Ref. 319278: On the 21st of January 2025, ACP upheld the decision to grant permission subject to revised conditions. In their Assessment the Inspectors Report concluded that the *'proposed development would accord with European, National, Regional and local planning and related policy, be consistent with the obligations of the Climate Action Plan, 2024 and the Climate Action and Low Carbon (Amendment) Act 2021, would not have an unacceptable impact on the existing landscape, archaeology or ecology, would not seriously injure the amenities of the area in terms of health, and it would be acceptable in terms of traffic safety and convenience.'*

3.2.3 Galway

ACP Ref. 317810: On the 27th of November 2024, ACP granted permission for an SID development for an 350MW Open Cycle Gas Turbine Power Plant at Tynagh Power Station, Co. Galway. In their conclusion, the Inspectors Report stated that the *'proposed development would be in accordance with European, National, and Regional renewable energy policies and with the provisions of the Galway County Development Plan 2022-2028, be consistent with the obligations of the Climate Action Plan 2024, would not seriously injure the visual amenities of the area or have an unacceptable impact on the character of the landscape or archaeological heritage, would not have a significant adverse impact on ecology, would be acceptable in terms of traffic safety and would make a positive contribution to Ireland's renewable energy and security of energy supply requirements.'*

GCC Ref. 212192: On the 13th of April 2022, GCC issued a notification of decision to grant permission for an Open Cycle Gas Turbine power plant (299MW) and associated infrastructure and buildings at Derryfrench, Co. Galway. This was appealed by a third party to An Coimisiún Pleanála.

ACP Ref. 313538: On 08 February 2023, ACP upheld the decision to grant permission with revised conditions for an Open Cycle Gas Turbine power plant (299MW) and associated infrastructure and buildings at Derryfrench, Co. Galway.

In their assessment, the Inspectors Report stated that *'any adverse impacts on climate would be localised, strategically short term and transitionary, but not significant when considered as part of the evolving energy supply network which is transitioning towards a greater reliance on renewables, in line with EU and National policy, and the contribution the proposed development would make to the achievement of the overall objective of Net Zero CO2 emissions by 2050'.*

3.2.4 Dublin

ACP Ref. 314365-22: On the 22nd of July 2022 ESB submitted a pre application relating to a proposed 299MW Open Cycle Gas Turbine Facility and associated grid connections at Poolbeg, Dublin 4.

In their SID pre application request the applicant argued that the proposed development did not meet the thresholds for strategic infrastructure development as set out in the Seventh Schedule and does not satisfy the criteria under S.37A(2) for strategic infrastructure development. Furthermore, it is argued

that the development does not meet the definition of transmission infrastructure for the purposes of s.182A of the act.

The basis of this argument was that the maximum electrical energy output of the OCGT will be limited to 299MW, which is below the 300MW threshold in the Seventh Schedule. The Board agreed and issued a direction on the 24th of January 2023 that the proposed development fell outside of the scope of Section 37A and Section 182A of the PDA 2000 and should be submitted directly to Dublin City Council.

DCC Ref. 3137/23: On the 11th of December 2023 DCC granted permission for the development.

DCC Ref. PWSDZ3074/23: On the 13th of February 2024, DCC granted permission for the demolition of two storage buildings and demolition of four oil tanks within the bunded area of the NORA Ringsend oil farm, and the Construction/installation of a 299MW Open Cycle Gas Turbine (OCGT) generating unit and all associated plant and equipment.

ESB applied directly to DCC via Section 34 of the Act. The report stated that *'whilst the EIAR considers and assesses the overall entire development, which includes a connection to the national grid via the existing 220kV Irishtown Substation, the subject planning application is limited to the proposed OCGT power generation aspect of the development proposal and does not seek permission for the connection to the national grid. The national grid connection will be subject to a separate planning application, pending an SID determination.'*

3.2.5 Cork

ACP Ref. 314003: On the 5th of July 2022 ESB submitted a pre application consultation request to ACP in respect of a 299MW Open Cycle Gas Turbine Plant at Aghada Power Station, Co. Cork. In their assessment of the proposed development the Inspectors Report concluded that it fell below the 300MW threshold and would not constitute strategic infrastructure, and on the 25th of August 2022 ACP issued a direction that the proposed development did not constitute strategic infrastructure.

It is important to note that there is a second trigger for Strategic Infrastructure under the 7th schedule that is relevant:

> *'An industrial installation for carrying gas, steam or hot water with a potential heat output of 300 megawatts or more, or transmission of electrical energy by overhead cables, where the voltage would be 220 kilovolts or more, but excluding any proposed development referred to in section 182A'.*

ESB stated that there is no heat output in the form of steam or hot water produced by the OCGT. With regard to electricity transmission, cabling is entirely ancillary to the OCGT, is within the site redline boundary only and will extend a short distance carrying electricity underground from the OCGT main transformer to a new bay of the existing on-site electrical substation. The Inspectors Report went onto state that '*with regard to transmission, the proposed development will connect to existing infrastructure on the site such as the gas pipeline and the electricity substation is stated to be ancillary to the proposed OCGT and the prospective applicant has confirmed that no new transmission infrastructure is being created'.*

CCC Ref. 235104: On the 7th of December 2023, CCC granted a 10-year permission for the construction of an Open Cycle Gas Turbine generating unit and all associated site development works.

3.3 Other Applications under Consideration from ACP

The following lists applications which were determined to constitute Strategic Infrastructure following a pre application with the Coimisiún, and are currently under review:

ACP Ref. 324113: On the 27th of February 2026, Bord Gais Energy submitted an SID application for the construction of an open-cycle gas turbine power plant, primarily fuelled by Natural Gas, along with all above ground installation and ancillary development on lands located in Pollnagroagh and

Rathmorrissy, Athenry, Co. Galway. This was following a pre application consultation with ACP (Ref. 320975) which determined that the development constituted Strategic Infrastructure.

ACP Ref. 324305: On the 22nd of May 2026, KIlshane Energy Limited submitted an SID application for the construction of 2 no. Gas-Fired Generation Stations, with an output of up to 340 Megawatts (MW) each, equating to a total output of up to 680MW, all associated ancillary structures, and services, including an Air Insulated Substation (AIS) adjacent to each of the turbines; along with a 400kV gas-insulated substation (GIS) building and associated compound to serve the proposed generation station on a site to the west of the N2 at Kilshane Road, Kilshane, Finglas, Dublin 11. This was following a pre application consultation with ACP (Ref. 323897) which determined that the development constituted Strategic Infrastructure.

3.4 Nearby Energy, Infrastructure and Extractive Developments

There are a number of neighbouring large scale energy projects in the wider vicinity of the site (5-10km radius) that demonstrate that, along with the context of quarries in the area, that the locality has an established record of accommodating large-scale energy, infrastructure and extractive industry developments, including Strategic Infrastructure Development.

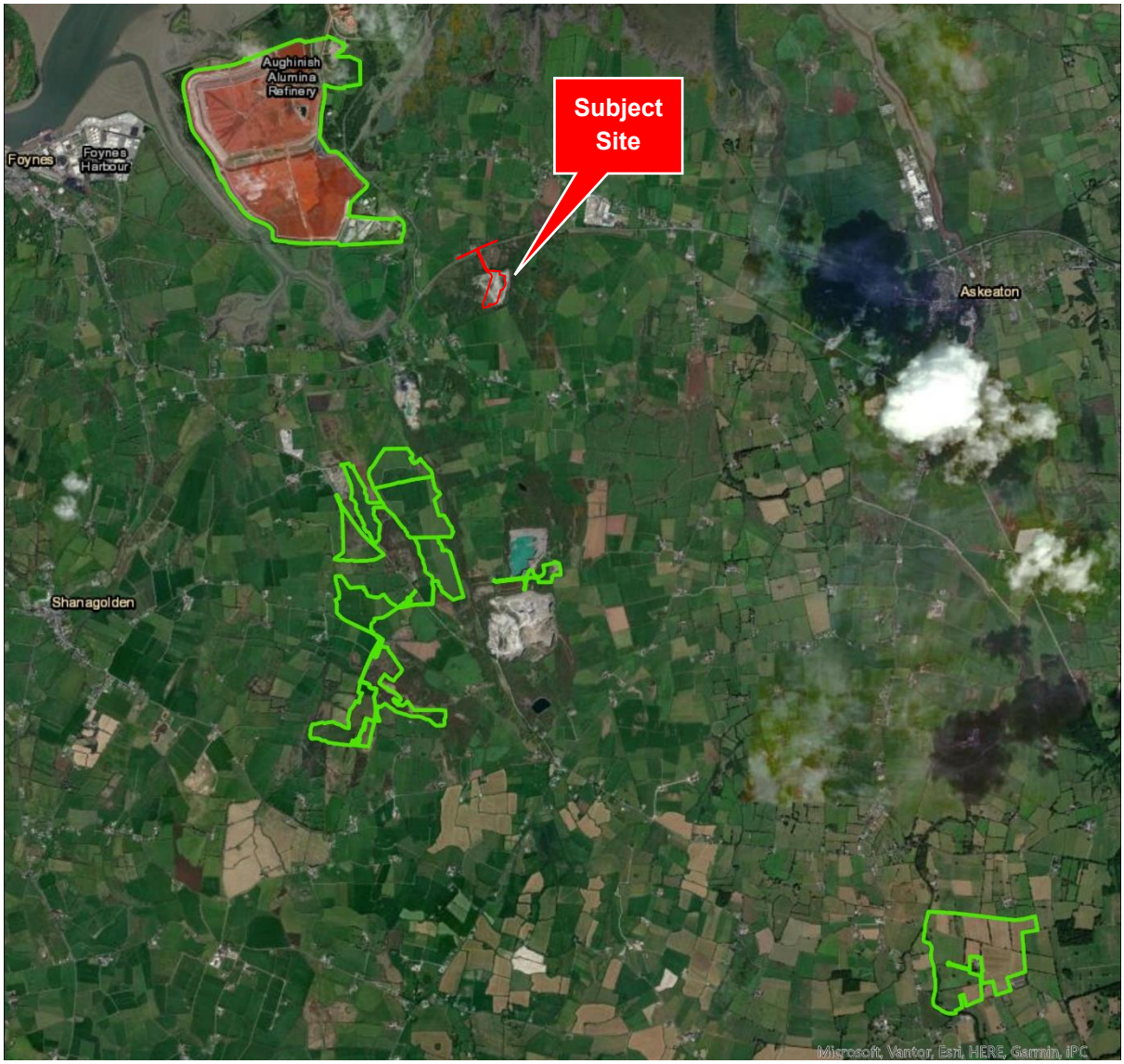

Figure 3-1 Subject Site in the wider context of recently granted industry and energy related developments.

The site is strategically positioned where a number of industrial and energy-related developments have been permitted in recent years, including solar farms, industrial projects, a new 110 kV substation, and the Foynes to Rathkeale Protected Road Scheme (2019), a project of national significance. Some of these energy related developments include:

LCCC Ref. 171220: On the 26th of September 2018, LCCC granted permission for a Solar PV Energy development with a total site area of 61.29 hectares, to include one Transmission System Operator (TSO) electrical substation with associated switchgear, TSO compound and control building, one customer substation with transformer, communications pole, compound and control building, electrical transformer and inverter station modules, Solar PV panels ground mounted on support structures, access roads and internal access tracks, spare parts storage containers, fencing, electrical cabling and ducting, CCTV and other ancillary infrastructure, a temporary site compound area, additional landscaping and habitat enhancement as required and associated site development works.

LCCC Ref. 1918: On the 30th of May 2019, LCCC granted permission for a Solar PV Energy development with a total site area of 30.15 hectares, to include, electrical transformer and invertor station modules, Solar PV panels ground mounted on support structures, access roads and internal access roads and internal access tracks, fencing, electrical cabling and ducting, CCTV and other ancillary infrastructure, a temporary site compound area, additional landscaping and habitat enhancement as required and associated site development works located in the townlands of Deelish and Mullagh.

LCCC Ref. 221258: On the 22nd of June 2023, LCCC granted permission for a solar farm comprising the construction of PV panels mounted on metal frames, new access tracks, underground cabling, perimeter fencing with CCTV cameras and access gates, installation of 9 transformer containers, a temporary construction compound and all ancillary grid infrastructure and associated works on lands 24.7 hectares located at Ellaha and Mullagh, Co. Limerick.

LCCC Ref. 2460320: On the 22nd of October, LCCC issued a notification of decision to refuse permission for a proposed 301,000 sq.m of solar panels on a 64-ha solar farm. The sole reason for refusal was as follows:

> *'The Planning Authority is not satisfied that the development as proposed complies with Objective EN O37 Preservation of Unrecorded/Newly Discovered Archaeological Heritage which prioritises the preservation of unrecorded and newly discovered archaeological heritage. The objective emphasises the need to protect and preserve archaeological remains of potential cultural, historical, or scientific importance, particularly when such remains are discovered during development works. The lack of appropriate archaeological assessment could result in the irreversible loss of valuable heritage assets. As such, the proposed development is inconsistent with the objective's requirement to ensure the protection and preservation of our shared archaeological heritage therefore contrary to the proper planning and sustainable development of the area.'*

ACP Ref. 321242: On the 27th of March 2025, An Coimisiún Pleanála overturned the decision of Limerick City and County Council and issued an order to grant permission for a solar farm on a 63.4 ha site in the townland of Ardgoulberg. In their assessment, the Inspector's Report stated that:

> *'It is considered that subject to compliance with the conditions set out below, the proposed development would be in accordance with European, national, and regional renewable energy policies and with the provisions of the Limerick City and County Development Plan 2022-2028, would not seriously injure the visual or residential amenities of the area or otherwise of property*

in the vicinity or have an of unacceptable impact on the character of the landscape or cultural or archaeological heritage, would not have a significant adverse impact on ecology, would be acceptable in terms of traffic impacts and safety and would make a positive contribution to Ireland's renewable energy and ***security of energy supply requirements****. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.*' [Emphasis Added].

ACP Reg. Ref. 318302: On the 31st of March 2025, ACP granted permission to Aughinish Alumina Limited for the expansion of the Bauxite Disposal Area, extension to the existing Salt Cake Disposal Cell and extension of the permitted borrow pit.

The existing alumina refinery at Aughinish is the largest of its kind in Europe and is thus of strategic national and continental importance. Aughinish Alumina Limited (the Applicant) operates a long-established alumina refinery, located on Aughinish Island on the southern side of the Shannon Estuary near the industrial port of Foynes, Co. Limerick. The landholding extends to c. 601 ha. The industrial activity undertaken at the site comprises the processing of bauxite in order to extract alumina (aluminium oxide) which is required for the production of aluminium as well as having a number of other industrial uses.

ACP Reg. Ref. 323591: On the 30th of April 2026, ACP granted permission for the construction of an Asphalt plant and associated site works at the existing Creeves Quarry in the townlands of Craggs and Ballylin in Co. Limerick.

The Inspector's Report stated that: '*it is considered that, subject to compliance with the conditions set out below, the proposed development would not seriously injure the residential or visual amenities of the area or of property in the vicinity, would not be prejudicial to public health or the environment, would be acceptable in terms of road and traffic safety and would not seriously injure the setting or character of archaeological heritage assets. Accordingly, it is considered that the proposed development would comply with objectives ECON O44 and CAF O16 (Circular Economy), IN O17 (Waste Management and the Circular ACP-323591-25 Inspector's Report Page 46 of 98 Economy), EH O22 (Commercial and Industrial Noise), EH O15(a) (Ground Water, Surface Water Protection and River Basin Management Plans), EH O17 (Water Quality) and EH O39 (Protection of the Setting of Archaeological Monuments) of the Limerick Development Plan 2022-2028.'*

While individual applications have been assessed on their merits and some have been refused, the overall pattern of decisions confirms that the area is recognised as suitable, in principle, for regionally and nationally significant infrastructure.

4.0 Planning Policy Context

4.1 Overview

Electricity demand in Ireland is forecast to increase significantly due to the expected expansion of many large energy users. It is necessary to have a mix of base load and flexible energy generation plant to provide a stable transmission system to meet the high levels of energy demand in Ireland.

The *2021 - 2030 National Energy and Climate Plan for Ireland* sets a target to increase electricity generated from renewable sources to 70%. In June 2019, the Minister of Communications, Climate Action and Environment committed to raise the amount of electricity generated from renewable sources to 70% by 2030 with no generation from peat and coal in the Climate Action Plan.

The *Policy Statement on Security of Electricity Supply* was published in November 2021 and states that *'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 proposed OCGT Plant would be an integral part of the drive to ensure security of electricity supply in Ireland.

Electricity supply must always operate to meet demand, though this can vary considerably. The minimum requirement is called the 'base load'. Increased demand can occur quite quickly, so the grid also needs to include some power sources that can supply at very short notice. Such sources are sometimes called '*peaking power plants'*. These generally run only when there is a high or 'peak' demand for electricity.

The purpose of the proposed development is to enhance the capacity and resilience of the national grid by providing additional generation at times when renewable energy production is insufficient to meet demand. The proposed development plays an important enabling role in Ireland's transition to a low-carbon electricity system. As renewable energy generation continues to increase, flexible and responsive electricity infrastructure is required to maintain security of supply during periods when renewable output is low. The proposed development is specifically designed to perform this supporting role, facilitating the continued expansion of renewable energy while ensuring a stable and reliable electricity system for homes, businesses and critical services.

Operating as a 'peaking plant' with minimal annual use (i.e. anticipated to be in the order of 1800 hours per annum though actual dispatch will be determined by system requirements), the proposed development will provide backup or 'flexible' generation during critical periods when renewable energy sources are not sufficient to meet demand. For the avoidance of doubt, the term 'peaker', or 'peaking', in this context refers to a dispatchable, fast-start facility operating intermittently to support system adequacy during periods of high demand and low renewable output.

The proposed development would play an important role in maintaining security of energy supply. *The National Development Plan (2021-2030)* (NDP) is clear that maintaining security of energy supply is a key national priority for the coming decade and beyond. This has been further underlined by the Government's '*Policy Statement on Security of Electricity Supply'*, published in November 2021, and *Eirgrid's 'Ireland Capacity Outlook 2022 – 2031'*, published in October 2022. The latest Climate Action Plan ('CAP25') also emphasises the need for urgent delivery of new generation capacity.

The NDP identifies an urgent requirement to deliver circa 2 GW of new conventional generation capacity by 2030, alongside c. 15.5 GW of new renewable capacity within the next ten years just to keep pace with increased demand for electricity, with EirGrid's Capacity Outlook forecasting capacity deficits for each year up to 2031. The position is stark, and has been exacerbated by:

- Lower than expected availability of some existing power stations.
- Anticipated new power stations not being developed as planned.
- Exceptional growth in demand for electricity due to increased economic activity, including the growth of large energy users such as data centres.
- The expected closure over the coming years of power stations which make up approx. 25% of existing conventional generation capacity.

In July 2025, the Government updated the National Development Plan (NDP). This plan commits to the largest ever investment in the State's history €275.4 billion between 2026 and 2035 to:

- Unlock housing delivery
- Upgrade water and energy infrastructure
- Improve roads and public transport.

The NDP includes an allocation of €3.5 billion for energy projects with ESB Networks and EirGrid.

Approximately 1,650MW of generation capacity is scheduled to be retired in the Republic of Ireland over the coming years, with a further 500-600MW retiring in Northern Ireland. Risks around extended periods of low renewable generation output and delays in the delivery of planned offshore capacity must also be countered.

The proposed development meets a need for electricity generation that has been signalled by the Government as being an urgent and appropriate response to the transition to a renewable based national energy supply.

4.2 National and Regional Policy

4.2.1 National Planning Framework (NPF 2040)

The first revision of the NPF was published in April 2025 to take account of changes that have occurred since it was published in 2018 and to build on the framework that is in place.

The Revised NPF places a stronger emphasis on ensuring the resilience and security of Ireland's energy systems, recognising the need for fuel diversification, enhanced system flexibility, and investment in critical infrastructure. National Strategic Outcome (NSO 8) *'Transition to a Low Carbon and Climate Resilient Society'* is the main NSO relevant to the proposed development. It recognises the need to: *reinforce the distribution and transmission network to facilitate planned growth and distribution of a more renewables focused source of energy across the major demand centres.*

Relevant NPOs include:

- **National Policy Objective 30***: Facilitate the development of the rural economy, in a manner consistent with the national climate objective, through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting biodiversity and the natural landscape and built heritage which are vital to rural tourism.*
- **National Policy Objective 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.*
- **National Policy Objective 75:** *Local Authorities shall plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant Regional Spatial and Economic Strategy, through their City and County Development Plans.*

The framework also acknowledges the transitional role of natural gas in supporting energy security. Stating that: *'gas will continue to play a key role to support the secure transition to an energy system, based on electrification and greatly increased renewables penetration.'*

4.2.2 Regional Spatial and Economic Strategy

The RSES provides the framework through which the NPF's vision will be delivered for the Southern Region. The RSES is shaped around the NPOs laid out within the NPF, as above. Delivering clean and reliable energy is a key objective, with a recognition of the need for resources / developments that support the transition towards such. Compact growth and the 'unlocking of potential' of sites is a further objective in support of the proposed development.

Resource Efficiency and Resilience are seen as key contributors to supporting decarbonisation and facilitating the transition to a low-carbon economy / society. The proposed development supports the security and supply of renewable energies and ensures the system remains resilient in instances of low supply of such. The RSES fully supports the transition to low carbon with, in support of the proposed development, an appreciation that *"This will require investment…appropriate assistance and incentives to enable enterprise to make the transition".*

Section 8.3 of the RSES relates to Gas network and highlights the Combined Heat and Power Plant at Tarbert, Co. Kerry as an energy hub case study. The gas network has the capacity to accommodate new loads as part of the Climate Change Adaptation Strategy. Increased use of the gas network can provide enhanced energy security at a relatively low cost. There is significant demand for renewable gas from industry as a heating and transport fuel. In addition, the circular economy benefits will also deliver a major decarbonisation benefit for agriculture and industry. GNI is committed to integrating indigenous renewable gas production (including biogas derived from waste) and grid injection.

An inherent part of the strategy is the building of capacity to enable effective implementation and to respond to emerging challenges and the need to address potential risks. With the proposed development providing security and support of electricity supply it is compliant with such.

Regional Policy Objectives' (RPOs) help steer the RSES. Of relevance to the Proposed Development are:

- **RPO50: Diversification** - *It is an objective to further develop a diverse base across… renewable energy.*
- **RPO56(e): Low Carbon Economy** - *It is an objective to support investments in energy efficiency of existing commercial stock.*
- **RPO89:** *It is an objective to support measures to build resilience to climate change.*
- **RPO96:** *It is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate renewable energy sources and ensure our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows.*
- **RPO 225 Gas Network:** *Subject to appropriate environmental assessment and the planning process where required, it is an objective to:*
    - *a) Promote renewable gas leading to carbon emission reduction in agriculture, industry, heating and transport as well as sustainable local employment opportunities.*
    - *b) Support the transition of the gas network to a "carbon neutral" gas network by 2050, which will drive Ireland and the Region to becoming a low carbon society.*
    - *c) Support investment in the sustainable development of agricultural biogas sector and regional gas supply projects which strengthen gas networks in the Region and assist integration of renewable gas to the grid network.*
    - *d) Support investment in developing renewable gas and provision of CNG refuelling infrastructure which will help reduce the Green House Gas emissions in both the agriculture and transport sectors and support Carbon Capture and Storage initiatives, which has the potential to decarbonise power generation at scale*
    - *e) Strengthen the gas network sustainably to service settlements and employment areas in the Region, support progress in developing the infrastructures to enable strategic energy projects in the Region. An example is the Tarbert/Ballylongford landbank in Co Kerry which is a strategic development site under the Strategic Integrated Framework Plan for the Shannon Estuary and support for the extension of the Gas Network from Listowel into the Kerry Hub and Knowledge Tri-Angle settlements of Tralee, Killarney and Killorglin.*

4.2.3 Government of Ireland, Policy Statement on Security of Electricity Supply (November 2021).

The Policy Statement on Security of Electricity Supply (Policy Statement) highlights the key challenges to ensuring security of electricity supply such as having adequate electricity generation capacity, storage, grid infrastructure, interconnection, and system services to meet both average and peak demand. It is recognised that security of energy supply needs to be maintained while transitioning to the target of up-to 80% of electricity consumption from renewable sources by 2030, with overall target of Net Zero Emissions for Ireland by 2050.

The Policy Statement highlights that *'Electricity is vital for the proper functioning of society and the economy'* and that maintaining security of supply is a national priority. Ensuring adequate generation capacity is recognised as a challenge to electricity security of supply, and **flexible conventional generation is stated to be necessary to support a renewables-led system**. It is set out that this generation **should progressively decarbonise** in order to achieve net zero emissions. The Policy Statement recognises the **need for significant investment in additional flexible conventional electricity generation**, electricity grid infrastructure, interconnection, and storage in order to ensure security of electricity supply.

The Policy Statement provides that *'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'***. [Emphasis Added].

Planning authorities were advised through *Circular Letter PL/2021 - Government Policy Statement on Security of Electricity Supply*, issued by the Government on the 10th December 2021, that where planning applications are submitted for electricity infrastructure or infrastructure that may impact on electricity supply – including for existing conventional electricity generation – that they should, until further notice, be considered having regard to the Policy Statement on Security of Electricity Supply. The National Energy Security Framework, published by the Government in 2022, further reiterated the importance of increasing the level of dispatchable electricity generation capacity significantly over the coming years in order to reliably meet the expected demand for electricity.

4.2.4 Climate Action Plan 2025

The latest annual Climate Action Plan published by the government, Climate Action Plan 2025 (CAP 2025), sets out the specific target to deliver at least 2GW of new flexible gas plant by 2030. CAP 2025, to be read in conjunction with CAP 2024, reiterates the role of flexible capacity in maintaining security of supply during the net zero transition. CAP 2024 states that:

> *"Considerable progress has been made in decarbonising the electricity sector, resulting in electricity emissions falling by 45% between 2001 and 2022. This was possible through the deployment of renewables and their successful integration into the electricity grid, as well as **the increased use of higher efficiency gas turbines**. 2021 and 2022 have seen increases in emissions of 1.4-1.5 million tonnes when compared to 2020, as 2021 saw both a "low wind" yield and a number of outages of the lower-carbon intensity gas-fired generators, resulting in an increase in the use of coal and oil. This highlights the need to diversify our renewable electricity generation sources **and increase our gas-fired generation capacity**."* [Emphasis Added].

The proposed development directly supports the achievement of this and, depending on the technology that is used, the turbines will have a total output capacity of either 385MW and as such is aligned with

Government policy on security of electricity supply and the transitional pathway set out in national climate and energy policy.

4.2.5 White Paper - Ireland's Transition to a Low Carbon Energy Future 2015-2030

The Government White Paper entitled *'Ireland's Transition to a Low Carbon Energy Future 2015-2030'* set out a framework to guide Ireland's energy policy development over the period 2015-2030. The framework takes account of European and international climate change objectives. The '*Energy Vision 2050'* established in the White Paper describes a 'radical transformation' of Ireland's energy system, which it is hoped will result in GHG emissions from the energy sector reducing by between 80% and 95%, compared to 1990 levels. This means that energy supply during the national transition to a renewable energy system will need to move away from carbon-intensive fuels such as peat and coal in favour of lower carbon fuels.

The White Paper notes that: "*No single renewable energy technology - existing or emerging - will alone enable Ireland to overcome the low carbon challenge. Rather, a diverse range of technologies will be required along the supply chains for electricity, heat and transport*"; and that *"Several forms of RES-E, such as wind, solar and ocean energy are reliant on weather conditions and have an inherent variability. They cannot be dispatched in the same way as traditional generators and this presents challenges for the electricity system".*

The proposed development will provide backup or 'flexible' generation during critical periods when renewable energy sources are not sufficient to meet demand.

4.2.6 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); and outlines a new strategy to ensure energy security in Ireland for this decade, while ensuring a sustainable transition to a carbon neutral energy system by 2050. 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 proposed development will directly assist in the improvement of security of energy supply.

The strategy acknowledges that Ireland's current energy system presents several risks in ensuring uninterrupted availability of energy sources. Two key risks relevant to the project are supply-side risks and demand-side risks. From a supply-side perspective, the report notes that

> *"Supply-side risks usually occur where there is the loss of supply from production or infrastructure facilities. Potential disruptions to supply can be caused by:*
>
> *(i) infrastructure or technical risks such as an outage of network infrastructure facilities,*
>
> *(ii) market risks such as expected imports being diverted to other markets due to sudden events and price responsiveness (this includes price risk rather than loss of physical supplies), and*
>
> *(iii) geopolitical risks such as when a key supply source becomes unavailable or significantly reduced due to global geopolitical events and/or natural disasters. As one of the most energy import dependent countries in the EU with limited diversity of supply, Ireland is exposed to this risk. In 2022, 82% of Ireland's energy needs came from*

imports. 48% of energy used in 2022 was from imported oil and nearly 31% from natural gas. 74% of Ireland's natural gas came from imports through two interconnectors from the UK."

From a demand-side perspective, the reports states that:

"a risk can occur where there is the possibility of sudden increases in energy demand over a relatively short period of time that cannot be met by corresponding increases in supply. Demand-side risks are generally caused by weather-related events such as cold snaps or periods of low wind or a combination of these events."

The strategy recognises that, while the supply-side risks will reduce as Ireland increases its renewable energy generation capacity, there will be an increase in demand-side risks as we transition away from fossil fuels such as coal and oil. Weather events will impact on the availability of renewables such as wind and solar power and the dependence of the electricity system on natural gas is expected to increase in the short- to medium-term, particularly at times of very low wind:

"In addition, the peak day demand for natural gas is expected to increase. This means the electricity system will continue to rely on natural gas as a fuel source as it transitions to a majority-renewables system and phases out natural gas in the medium-term."

Taken together, national energy and climate policy clearly recognises that additional flexible, dispatchable electricity generation is required as a matter of public interest to maintain security of supply during the transition to a renewables-led electricity system. This need is identified at national level and is not dependent on local electricity demand.

The strategy document sets out a number of actions required to strengthen Ireland's Energy Security including Action 8 '*to complete the implementation of the CRU Security of Electricity Supply Programme'.* This action acknowledges the programme of work undertaken by the Commission for the Regulation of Utilities (CRU) to mitigate the risks of an identified shortfall in generation capacity in the electricity sector since the declaration of a capacity crisis in this sector in 2021. The procurement of at least 2GW of new, flexible, enduring, capacity through market mechanisms is included in the CRU-led Security of Supply programme of actions under Action 8.

4.2.7 EirGrid Generation Capacity Statement

EirGrid's most recent Generation Capacity Statement identifies ongoing and forecast challenges in maintaining adequate electricity generation capacity to meet peak demand and ensure system security, particularly in the context of increasing renewable penetration, rising electricity demand, and the planned retirement of older thermal plant. The statement highlights the continued requirement for new flexible and dispatchable generation capacity to address periods of system stress and to support the reliable operation of the electricity system.

In this context, the delivery of additional flexible generation capacity is identified as a necessary component of maintaining security of supply over the coming decade, complementing renewable energy deployment and other system flexibility measures.

There is now an urgent need to develop new responsive power plants, such as the Proposed Development, to support the Government's renewable energy commitments and to ensure security of electricity supply over the next five to ten years. The Proposed OCGT plant is designed for this purpose and will provide quick response generation capability which will help to ensure security of supply over the coming years.

4.3 Local Policy

The subject site is located within the administrative boundary of Limerick County Council and is subject to the provision and guidance of the Limerick City & County Development Plan 2022-2028 (hereafter referred to as the 'Development Plan'), and the Development Plan came into effect on the 29th of July 2022. This note provides a general overview of the relevant policies and objectives of the Plan in relation to the proposed development.

4.3.1 Zoning

The subject site is located within a rural area, does not fall within any designated land use zoning classifications. In this context, the assessment of the proposed development is not governed by land-use zoning designations applicable within towns or villages, but rather by the overarching policies and objectives of the Development Plan.

The absence of zoning does not preclude development; rather, the acceptability of development is determined having regard to the proper planning and sustainable development of the area and the specific policy provisions applicable to the location and development proposed.

In this regard the Development Plan allows for industrial development and on lands

1. zoned for such a purpose within towns, villages and Limerick City & Suburbs and

2. on previous brownfield lands. The application site is located on a brownfield site within an existing quarry site.

Section 3.3.1.3 of the Development Plan states that *"Brownfield land is a term used to describe previously developed land that is not currently in use and which has the potential for redevelopment. Often such lands are of large scale and have previously been in use for industrial or commercial purposes and became derelict due to obsolescence, vacancy or demolition of structures. Some brownfield sites may have a legacy of contamination from operational activities or waste disposal."*

The proposed development which is to be located on a now disused extraction site is considered to be generally in line with Objective ECON O20 Location of Industry or Enterprise in Brownfield Sites which facilitates industry or enterprises in brownfield sites with previously established industrial or commercial use, or derelict sites in a commercial, industrial or mixed-use area subject to normal and environmental criteria.

Objective ECON O20 - Location of Industry or Enterprise in Brownfield Sites: *It is an objective of the Council to facilitate industry or enterprises in brownfield sites with previously established industrial or commercial use, or derelict sites in a commercial, industrial or mixed-use area, subject to the following considerations:*

a) The use should be appropriate to the scale and context of the site, taking into account traffic and other impacts on local infrastructure and neighbouring land uses and amenities;

b) Structures of conservation merit should be re-used and not replaced;

c) The works are necessary for the proposed economic activity or activities.

It also submitted that the project takes place on a site that is characterised by having a combination of distinctive advantages that include being a brownfield site with an industrial/extractive history as a quarry site; and represents an adaptive re-use of the lands.

It is considered that that the principle of the use of the subject site for electricity generation would be consistent with the proper planning and sustainable development of the area as well as with the totality of Governments most up to date policy on climate change, energy efficiency and imperative for decarbonising of the Country's electricity generation system.

4.3.2 Energy and Climate Action

Section 8.6 of the Plan details the guidance on energy networks. The plan states that: *"the strengthening of the national grid is important for a number of reasons, including improving security of supply for the domestic, residential and enterprise market, adapting the infrastructure and network to transition to the smart, low carbon systems and to attract high-end enterprise, which often require significant energy capacity and reliability."*

Limerick City and County Council are aware of the importance of managing our energy consumption and emissions outputs, in terms of addressing climate change and the transition to a low carbon economy. The Council have commissioned the preparation of an Energy and Emissions Balance Report for Limerick, which considers energy consumption, carbon emissions and fuel costs. The report focussed on energy and emissions generated between 2000 and 2020 and the projected energy demands and emissions from 2021 up to year 2030.

Relevant policies and objectives include:

Objective IN O13 Energy and Gas Networks: *It is an objective of the Council to:*

a) *Support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers (subject to appropriate environmental assessment and the planning process), ensuring the energy needs of future population and economic expansion across Limerick and the wider Southern Region can be delivered in a sustainable and timely manner.*
b) *Protect existing infrastructure and strategic route corridors for energy networks from encroachment by development that might compromise the performance of the networks.*
c) *Require energy transmission infrastructure to comply with best practice with regard to siting, design and least environmental impact, in the interest of landscape protection.*
d) *Require that, in all new developments, multiple services are accommodated in shared strips underground and that access covers are shared, whenever possible. The location of services shall be subterranean, where appropriate. Where existing and proposed high voltage lines traverse new residential, commercial or civic developments, these should be relocated underground where technically feasible. The Council will require written consent to this relocation as part of the planning application process.*
e) *Support the transition of the gas network to a carbon neutral network by 2050, thereby supporting Limerick to become carbon neutral.*
f) *Support Community Energy Companies to create positive energy districts.*
g) *Ensure that in the delivery of energy infrastructure, the strategic function of the national road network is safeguarded in accordance with national policy by utilising available alternatives.*

- **Objective IN O15 - Electricity Grid Development:** *It is an objective of the Council to support the Eirgrid Grid Development Strategy - Your Grid, Your Tomorrow (2017) (ENCL1), to serve the future electricity needs of Limerick. This includes the delivery, integration and connection of renewable energy proposals to the grid in a sustainable and timely manner, subject to appropriate environmental assessment and the planning process.*

- **Objective CAF O26 - Bio Energy:** *It is an objective of the Council to support the development of bio energy and projects in suitable locations and subject to adequate assessment. The development of grid injection, where this is necessary for renewable energy input will also be supported.*

Section 9.4.10 of the Plan details the guidance for Combined Heat and Power Plants. The Plan recognises that ***'natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand**.'* [Emphasis Added].

Relevant policies and objectives include:

- **Policy CAF P9 - Renewable Energy Technologies:** *It is a policy of the Council to consider all emerging renewable energy technologies, such as hydrogen electrolysis, pumped storage and small-scale anaerobic digestion and any other source of renewable energy technologies that are viable as a means of energy security, subject to the relevant level of necessary environmental and ecological assessments.*

- **Objective CAF O38 - Emerging Technologies:** *It is an objective of the Council to facilitate and encourage future renewable energy technologies, such as hydrogen electrolysis, pumped storage and small-scale anaerobic digestion and any other source of renewable energy technologies, that are viable as a means of energy security, subject to compliance with all relevant planning criteria.*

Section 8.6.3 of the Plan details guidance relating to Gas. The Plan states that: '*Gas Networks Ireland (GNI) is responsible for the development, operation, maintenance and delivery of gas safely to businesses, the community and to power stations for the generation of electricity. GNI's Network Development Plan 2018 – Assessing Future Demand and Supply Position outlines how the gas network will develop over a ten-year period, based on existing supply and demand, as well as projections for growth in gas infrastructure and consumption.*

The document also examines system operation and consequent capital investment requirements by GNI to deliver the objectives of the NDP. In working towards securing a low carbon economy and meeting carbon emission targets, ***GNI are progressing ideas around the development of renewable gas injection infrastructure and Compressed Natural Gas Infrastructure****, which could be used in the transport and agricultural sectors in particular.'* [Emphasis Added].

- **Objective IN O16 - Gas Development:** *It is an objective of the Council to support GNI's Network Development Plan 2018 – Assessing Future Demand and Supply Position to serve the future needs of Limerick. This includes the delivery, integration and connection of renewable energy proposals to the grid in a sustainable and timely manner, subject to appropriate environmental assessment and the planning process.*

Chapter 9 of the Plan centres on Climate Action and the Transition to a Low Carbon Economy. Managing a successful low carbon transition means investing more in clean energy transition-related technologies, as well as moving towards more sustainable and perhaps localised modes of production and consumption. One of the key challenges for the climate-neutral transition is to reallocate resources from carbon-intensive to climate-neutral developments and infrastructure.

Relevant policies and objectives include:

- **Policy CAF P2 - Transition to a Low Carbon Economy:** *It is a policy of the Council to support the transition to a low carbon climate resilient economy, by way of reducing greenhouse gases, increasing renewable energy and improving energy efficiency and will future proof policies and objectives to deliver on this approach, in so far as possible.*

- **Objective CAF O14 - Energy Generation:** *It is an objective of the Council to support the local production of renewable energy and connection to the gas network. Where electricity is being generated locally, the Council will support the provision of infrastructure for its transmission to the grid, subject to it fulfilling technical and environmental requirements.*

4.3.3 Biodiversity and the Environment

Chapter 6 of the Plan details the guidance relating to environment, heritage, landscape and green infrastructure.

The nearest surface water feature to the site is the Glenbane West Stream, which is located approx. 330m to the north east of the site, and is separated from the site by agricultural fields, a railway line and the N69. Based on a on a review of Floodmaps.ie, the site is not designated within Zone A or Zone B for Flood Risk, however, a Site-Specific Flood Risk Assessment will accompany the future planning application in accordance with Objective CAF O20.

Objective CAF O20 - Flood Risk Assessments: *It is an objective of the Council to require a Site-Specific Flood Risk Assessment (FRA) for all planning applications in Flood Zones A and B and consider all sources of flooding (for example coastal/tidal, fluvial, pluvial or groundwater), where deemed necessary. The detail of these Site-Specific FRAs (or commensurate assessments of flood risk for minor developments) will depend on the level of risk and scale of development. The FRA will be prepared taking into account the requirements laid out in the SFRA, and in particular in the Plan Making Justification Tests as appropriate to the particular development site. A detailed Site-Specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations.*

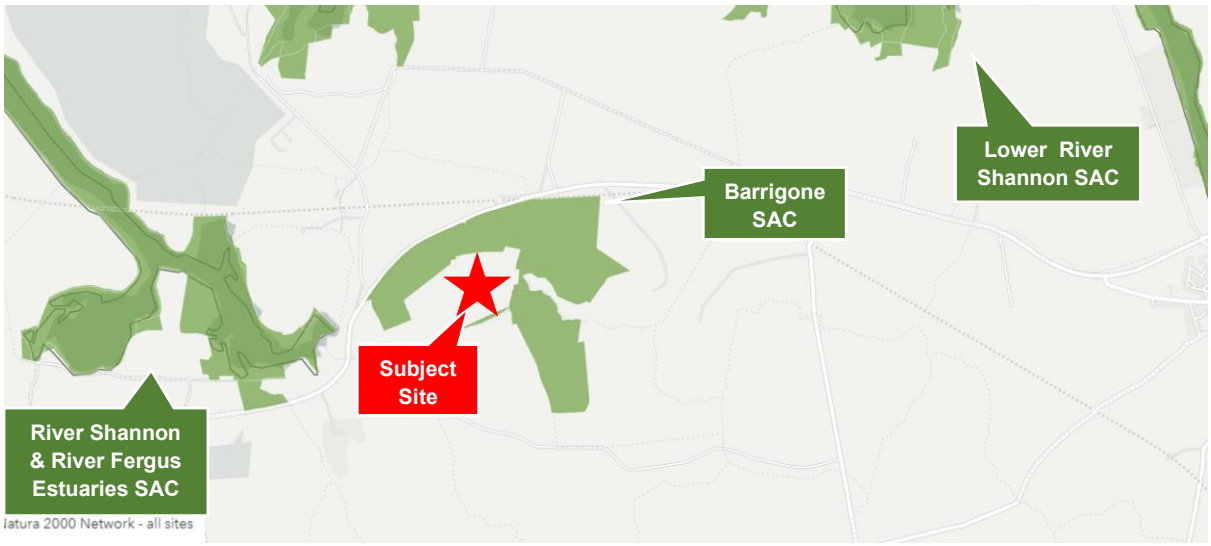

Figure 4-1 OCGT application site in relation to existing Natura 2000 Network.

With regards to the Natura 2000 network, the subject site is not located within any protected area. The proposed development is located adjacent to the Barrigone SAC (Site Code: IE0000432) and 750m west of the River Shannon and River Fergus Estuaries SPA (Site Code: IE00004077), and south of the Lower River Shannon SAC (Site Code: IE00002165).

A series of site visits will be carried out to inform the assessment and design of the project. Due to the close proximity of the SAC and the site situated 5km from Lower Shannon SPA there is potential for wintering birds to be located on the surrounds of the site. This will be reviewed as part of the surveys to be undertaken as part of the Planning Application.

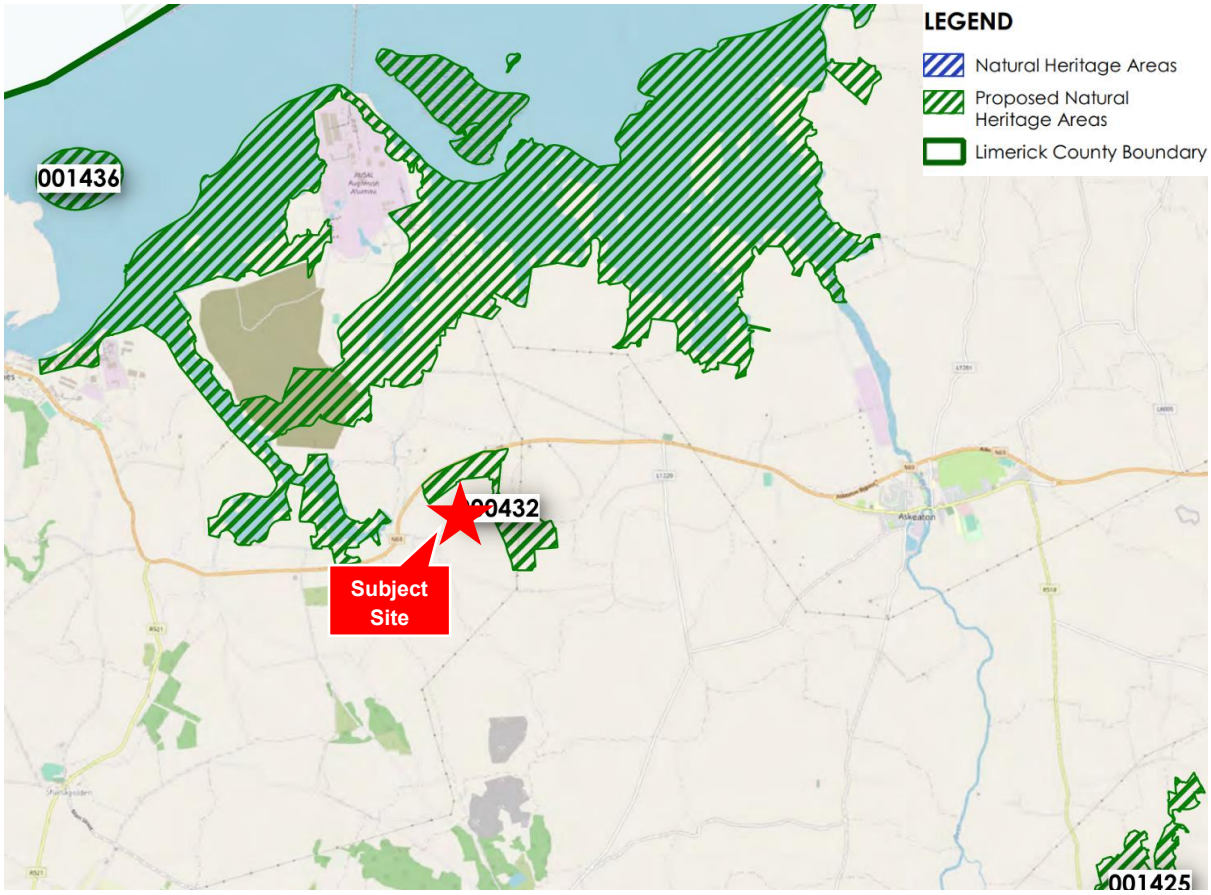

Figure 4-2 OCGT application site in relation to existing and proposed Natural Heritage Areas within Foynes.

Relevant Policies and Objectives include:

- **Policy EH P1 - Protection of Natural Heritage and Biodiversity:** *It is a policy of the Council to: a) Protect and conserve Limerick's natural heritage and biodiversity, in particular, areas designated as part of the European Sites Natura 2000 network, such as Special Protection Areas (SPAs) and Special Areas of Conservations (SACs), in accordance with relevant EU Directives and national legislation and guidelines. b) Maintain the conservation value of all-Natural Heritage Areas and proposed Natural Heritage Areas (pNHAs) for the benefit of existing and future generations.*
- **Objective EH - O5 New Infrastructure Projects:** *It is an objective of the Council to require new infrastructure and linear developments in particular, to demonstrate at design stage sufficient measures to assist in the conservation of and dispersal of species and to demonstrate a high degree of permeability for wildlife, to allow the movement of species and to prevent the creation of barriers to wildlife and aquatic life in the wider countryside.*
- **Objective EH O3 - Ecological Impact Assessment:** *It is an objective of the Council to require all developments where there are species of conservation concern, to submit an ecological assessment of the effects of the development on the site and nearby designated sites, suggesting appropriate mitigation measures and establishing, in particular, the presence or absence of the following species: Otter, badger, bats, lamprey and protected plant species such as the Triangular Club Rush, Opposite Leaved Pond Weed and Flora Protection Order Species generally.*
- **Objective EH O14 - Nature Based Solutions***: It is an objective of the Council to increase the use of Nature Based Solutions (NBS) throughout Limerick.*
- **Policy EH P2 Sustainable Management and Conservation-** *It is a policy of the Council to ensure the sustainable management and conservation of areas of natural environmental and geological value within Limerick and to protect, enhance, create and connect, where ecologically suitable, natural heritage, green spaces and high-quality amenity areas for the benefit of biodiversity.*

- **Policy EH P3 Climate Action and the Natural Environment**- *It is a policy of the Council to take into account the contents of the National Biodiversity Action Plan and the Biodiversity Climate Adaption Plan and any forthcoming guidance or legislation on climate action, whether adaption or mitigation that will emerge during the course of the Plan.*
- **Policy EH P6 Water and Air Quality -** *It is a policy of the Council to ensure that water and air quality shall be of the highest standard, to ensure the long term economic, social and environmental well-being of Limerick's resources. The World Health Organisation Air Quality Guidelines will be the basis for the air quality guidance in Limerick.*
- **Policy EH P7 Environmental Noise** - *It is a policy of the Council to proactively manage environmental noise, where it may have a significant adverse impact on the health and quality of life of communities in Limerick and to support the aims of the Environmental Noise Regulations, through the development and implementation of Noise Action Plans.*
- **Objective EH O1 Designated Sites and Habitats Directive -** *It is an objective of the Council to ensure that projects/plans likely to have significant effects on European Sites (either individually or in combination with other plans or projects) are subject to an appropriate assessment and will not be permitted under the Plan unless they comply with Article 6 of the Habitats Directive. The Council, will through the planning enforcement process where applicable, seek to restore the ecological functions of designated sites, where they have been damaged through inappropriate development.*

Having regard to noise and vibrations, the information included in the EIAR along with the Noise Impact Assessment Report provided by AWN Consulting with detail any potential for noise and vibration from the proposed development during the operation and construction phases.

4.3.4 Infrastructure

Section 11.7.2.3 of the Plan provides guidance for biogas and innovative energy developments. It states that the Council acknowledges the robust contribution innovative energy solutions make to Ireland's transition to a low carbon society.

General requirements of planning applications for such developments include:

- Planning justification and assessment of the project outlining how the project is implementing current national, regional and local policy in relation to sustainable energy;
- Waste management and disposal, Waste Disposal and Asbestos Assessment if refurbishing existing structures;
- Technical specifications of all structures on site including plant buildings, storage facilities, processing structures such as tanks, generators, control buildings, flare stacks, substations, staff facilities, parking provision etc.
- Natural heritage, environmental reports (EIAR and AA), ground conditions, impact on ground waters and surface waters, drainage and flood risk;
- Landscape Character Area as designated under this Plan;
- Ground conditions, hydrology, geology, hydrogeology, impact on ground water and surface waters;
- Implication for traffic including safety, trip generation and movement during construction and at operational stage, transport of the flammable material, impact on road network;
- Water services availability;
- Connection to the National Grid;
- The developer will be requested to submit as part of the planning application a Noise Assessment, establishing potential adverse effects at noise sensitive receptors and any necessary noise mitigation measures. The assessment should be prepared by a suitably qualified professional with sufficient expertise;
- Mitigation measures for odour and dust nuisance for public health;
- Visual impact;
- Source and volume of raw material, processing methods including a Nutrient Management Plan if relevant. Details of the destination of final product and method of transport;

- Landscaping, security and fencing.

These issues will be addressed as either individual reports and drawings or as part of the Environmental Impact Assessment Report (EIAR).

Relevant policies and objectives include:

Objective IN O1 - Climate Action in Infrastructure Planning: *It is an objective of the Council to:*

a) Require all infrastructure development, whether above ground or subterranean, to avoid flood risk areas and areas at risk of coastal erosion.
b) Require site selection, location, design and materials to have regard to and be resilient to the changing climate (high winds, temperature fluctuations, increased storm intensity and changes in rainfall).
c) Collaborate with utility and service providers to ensure their networks are resilient to the impacts of climate change, both in terms of design and ongoing maintenance.

Objective EH O22 - Commercial and Industrial Noise: *It is an objective of the Council to prevent members of the public being significantly adversely affected by environmental noise from commercial and industrial noise activities.*

Objective EH O21 Noise and Vibration during Construction and at Open Sites *It is an objective of the Council to protect the quality of the environment against the effects of noise and vibration, by implementing site appropriate mitigation measures during the construction and demolition phases of development.*

Objective EH O24 - Light Pollution: *It is an objective of the Council to ensure that the design of external lighting schemes minimise the incidence of light spillage or pollution in the immediate surrounding environment. In this regard, developers shall submit lighting elements as part of any design, with an emphasis on ensuring that any lighting is carefully directed, not excessive for its purpose and avoids light spill outside the development and where necessary will be wildlife friendly in design.*

A lighting layout plan will be provided in accordance with Objective EH O24.

With regards to noise, section 11.3.12 of the plan states that where noise is identified as an issue on a site, planning applications should be supplemented by an Acoustic Design Statement carried out by a suitably qualified person. The Acoustic Design Statement should demonstrate that all facets of ProPG have been followed. This will be carried out by AWN as part of the Noise Chapter for the EIAR.

4.3.5 Natural and Cultural Heritage

As detailed in Map 6.1 – Landscape Character Areas, the site is located within LCA 06 – Shannon Coastal Zone. This area is described as a *'large area of northern Limerick and is bounded on one side by the Shannon Estuary, while its southern boundary is defined by the gradually rising ground, which leads onto the agricultural zone and the western hills to the south west. The presence of the estuary is the defining characteristic of the region. The landscape itself is generally that of an enclosed agricultural type, essentially that of a hedgerow dominant landscape. This differs from the other agricultural landscapes of the County, in that the field patterns, particularly close to the Estuary, tend to be less regular than those elsewhere in Limerick.'*

It contains specific objectives including:

- To rigidly adhere to best practice in the installation and use of wastewater treatment systems, given the proximity of the Shannon and the importance of water-based habitats in the area, to ensure that no deterioration in water quality takes place.
- To protect the views and prospects along the N69 (see Map 6.2), as a priority for the Planning Authority.
- Where wind farms are permitted, it is recommended that single lines of equally spaced turbines shall be considered, in order to limit the visual and landscape impact.

It is noted that the closest view along the N69 is located approx. 5km to the north west of the site.

Relevant Policies and Objectives include:

- **Policy EH P8 - Landscape Character Areas:** *It is a policy of the Council to promote the distinctiveness and where necessary safeguard the sensitivity of Limerick's landscape types, through the landscape characterisation process in accordance with the Draft Guidelines for Landscape and Landscape Assessment (2000) as issued by the Department of Environment and Local Government, in accordance with the European Landscape Convention (Florence Convention) and with A National Landscape Strategy for Ireland – 2015- 2025. The Council shall implement any relevant recommendations contained in the Department of Arts, Heritage and the Gaeltacht's National Landscape Strategy for Ireland, 2015 – 2025.*
- **Objective EH O31 - Views and Prospects:** *It is an objective of the Council to: a) Preserve, protect and encourage the enjoyment of views and prospects of special amenity value or special interests and to prevent development, which would block or otherwise interfere with views and/or prospects. b) In areas where scenic views and prospects are listed in the Plan, there will be a presumption against development, except that required to facilitate farming and appropriate tourism and related activities. The development must be appropriately designed so that it can be integrated into the landscape.*

A Landscape and Visual Impact Assessment prepared by Mitchell & Associates will accompany the planning application.

There are a number of archaeological sites surrounding the subject lands, as detailed above in section 2.2 of this report. However, none of these sites are detailed in Volume 5 of the LCDP – Record of Monuments and Places.

Section 6.5 of the Development Plan details the guidance relating to Archaeology and Built Heritage. It should be noted that under the previous permission (LCC Reg. Ref 2560020) the following condition was attached which will be adhered to by all proposed site works as part of this application:

> *15. A protective buffer shall be established around the Recorded Monument, LI010-083. This buffer shall be 30m in extent from the outer known edge of the monument, where no extraction, ground disturbance, deep rooted planting, landscaping or future exempted development shall occur in perpetuity. Prior to commencement of development, the developer shall submit a drawing showing the buffer to the Recorded Monument, annotated with the RMP number, classification of the site and defining the buffer in perpetuity.*

The Planning Authority will request potential developers to carry out archaeological assessments, in areas adjacent or in the vicinity of Recorded Monuments. Proposed developments can have a visual as well as a physical impact on the archaeological remains and developers are advised to respect the setting of the monuments in the wider landscape, when considering areas for development potential. The Planning Authority will refer all proposed developments likely to impact on the archaeological heritage to the National Monuments Service.

Relevant policies and objectives include:

- **Objective EH O36 - Preservation of the Archaeological Heritage:** *It is an objective of the Council to seek the preservation of all known sites and features of historical and archaeological interest. This is to include all the sites listed in the Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act 1994. The preferred option is preservation in situ, or at a minimum preservation by record.*
- **Objective EH O39 - Protection of the setting of Archaeological Monuments:** *It is an objective of the Council to ensure that no development shall have a negative impact on the character or setting of an archaeological monument.*

An Archaeological Impact Assessment Report will accompany the planning application.

4.3.6 Development Management Standards

Section 11.7.2 of the Plan details the guidance for renewable energy developments. It states that there is a *'need to adopt a more sustainable approach to energy production is acknowledged by the Planning Authority. They will be considered in the context of current Government policy on the subject but will take into account other, often competing, Council policies and any relevant guidelines issued from time-to-time by the Department of Housing, Local Government and Heritage*.'

Section 11.7.3 of the Plan details the guidance for Energy Networks in the county. The Council recognises the strategic and economic importance of investment in networks and energy infrastructure and will be guided by the Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure, Department of Communications, Energy and Natural Resources, 2012 and any subsequent replacement national policy document. The Council will assist ESB Networks, EirGrid and Gas Networks Ireland to improve the distribution networks for electricity and gas throughout Limerick.

When assessing proposals, the Council said that they will take the following into account:

- Proper planning and sustainable development of the areas including the economic and social significance of the proposed development;
- Environmental impacts including the protection of European designated areas (NHAs, pNHAs, SPAs, SACs, National Monuments, Protected Views and the Landscape Characters as designated by this Plan;
- Mitigation measures where impacts are inevitable; and
- Cumulative impact of the proposal

The purpose of the proposed development is to enhance the capacity and resilience of the national grid by providing additional generation at times when renewable energy production is insufficient to meet demand.

The proposed development will play an important enabling role in Ireland's transition to a low-carbon electricity system. As renewable energy generation continues to increase, flexible and responsive electricity infrastructure is required to maintain security of supply during periods when renewable output is low. The proposed development is specifically designed to perform this supporting role, facilitating the continued expansion of renewable energy while ensuring a stable and reliable electricity system for homes, businesses and critical services.

Given the sites history, surrounding context and the range of National, Regional and Local level policy, we submit that the subject site would be an appropriate location for the OCGT.

4.3.7 Traffic and Transport

It is proposed to use the existing quarry road to access the proposed development. The construction traffic will peak at around 150 staff on site, while the operational phase will have around 3/4 staff on site. A Traffic and Transport Assessment will accompany the planning application.

Figure 4-3 OCGT site application area entrance along the N69.

With regards to National Roads within Limerick, the following policies are relevant:

Policy TR P12 Safeguard the Capacity of National Roads:

a) *Protect the capacity of the national road network, having regard to all relevant Government guidance and associated junctions, including DoECLG Spatial Planning and National Roads Guidelines (DoECLG, 2012) in the carrying out of Local Authority functions and;*
b) *Ensure development does not prejudice the future development, or impair the capacity of, the planned national roads, which includes the N/ M20 Cork to Limerick Scheme and Foynes to Limerick Road (including Adare Bypass) projects and other schemes referenced in Section 7.4;*
c) *Continue to engage, at an early stage, with relevant transport bodies, authorities and agencies in respect of any plans or projects that are located in proximity to national road infrastructure.*

Objective TR O39 National Roads:

a) *Prevent, except in exceptional circumstances and subject to a plan-led evidence-based approach, in consultation with Transport Infrastructure Ireland, in accordance with the Section 28 Ministerial Guidelines Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012), development on lands adjacent to the existing national road network, which would adversely affect the safety, current and future capacity and function of national roads and having regard to reservation corridors, to cater for possible future upgrades of the national roads and junctions;*
b) *Avoid the creation of any new direct access points from development, or the generation of increased traffic from existing direct access/egress points to the national road network, to which speed limits greater than 60km/h apply;*
c) *Facilitate a limited level of new accesses, or the intensified use of existing accesses, to the national road network on the approaches to, or exit from, urban centres that are subject to a speed limit of between 50km/h and 60km/h. Such accesses will be considered where they facilitate orderly urban development and would not result in a proliferation of such entrances.*

4.3.8 Waste Management

The following definition of the circular economy is referenced in Section 8.7.1 of Chapter 8: Infrastructure of the LDP: *'A circular economy is based on the principles of designing out waste and pollution, keeping products and materials in use and regenerating natural systems.'*

It is well noted in the LDP that the concept of a circular economy can bring about significant benefits, creating opportunities economically and financially. There is a focus on keeping products and resources in use for longer, promoting and moving towards a circular economy. The LDP sets out the following

objectives for waste management and the circular economy within the county within Objective IN O17 Waste Management and the Circular Economy:

It is an objective of the Council to:

a) *Support innovative, smart solutions and processes, based on the principles of the circular economy to implement the Regional Waste Management Plan for the Southern Region 2015-2021 and any subsequent plan, including any targets contained therein.*
b) *Collaborate with the Regional Waste Management Office and other agencies to implement the EU Action Plan for the Circular Economy- Closing the Loop 2015, its successor the Circular Economy Action Plan for a Cleaner More Competitive Europe, 2020 and the Resources Opportunity- Waste Management Policy, DECLG 20212 and any subsequent plans.*
c) *Promote sustainable patterns of consumption and production in the areas of product design, production processes and waste management.*

A Resource and Waste Management Plan will be prepared by AWN Consulting for the proposed development.

4.3.9 Sustainable Urban Drainage Systems and Nature Based Solutions.

Sustainable management of water, waste and other environmental resources is supported in both National Strategic Outcome 9 of the NPF and the RSES. National Policy Objectives 5 of the NPF also advocates enhanced water quality and resource management, by way of flood risk management, consideration of River Basin Management Plan objectives and use of Sustainable Urban Drainage Systems.
Any site-specific solutions to surface water drainage systems shall meet the requirements of the Water Framework Directive and the River Basin Management Plan 2018 – 2021 and Water Quality in Ireland 2013 - 2018 (2019), or any updated version of these documents.

Relevant Objectives and Policies include:

- **Objective IN O12 Surface Water and SuDS** *It is an objective of the Council to:*
  a) *Ensure the separation of foul and surface water discharges in new developments through the provision of separate networks within application site boundaries.*
  b) *Work in conjunction with other public bodies towards a sustainable programme of improvement for riverbanks, back drains, etc.*
  c) *Maintain, improve and enhance the environmental and ecological quality of surface waters and groundwater, including reducing the discharges of pollutants or contaminants to waters, in accordance with the National River Basin Management Plan for Ireland 2018-2021 (DHPLG) and the associated Programme of Measures and any subsequent River Basin Management Plan.*
  d) *Ensure adequate storm water infrastructure to accommodate the planned levels of growth within the Plan area and to ensure that appropriate flood management measures are implemented to protect property and infrastructure.*
  e) *Cater for the future developments through public and private driven initiatives where discharge capacity permits.*
  f) *Address the issue of disposal of surface water generated by existing development in the area, through improvements to surface water infrastructure, including for example attenuation ponds, the application of sustainable urban drainage techniques, or by minimising the amount of hard surfaced areas, or providing porous surfaces as the opportunity arises.*
  g) *Protect the surface water resources of the Plan area and in individual planning applications request the provision of sediment and grease traps and pollution control measures where deemed necessary.*

h) *Require all planning applications to include surface-water design calculations to establish the suitability of drainage between the site and the outfall point and require all new developments to include SuDS, to control surface water outfall and protect water quality in accordance with the requirements of Chapter 11: Development Management Standards of the Plan.*
i) *Promote SuDS and grey water recycling in developments and responsible use of water by the wider community, to reduce the demand for water supply.*
j) *Require SuDS schemes to be designed to incorporate the four pillars of water quality, water quantity, biodiversity and amenity to the greatest extent possible within the constraints of a given site.*
k) *Allow sufficient land take for SuDS when planning the site and consider the region as a whole, in association with adjoining lands and their requirements in designing SuDS. Developers may be required to set aside lands to cater for not only their own SuDS but also regional SuDS.*
l) *Promote the provision of suitable blue and green infrastructure and Nature Based Solutions to the surface water disposal in new development, as a means to provide urban flood resilience. This approach capitalises on the potential of urban green spaces and natural water flows, subject to the other planning considerations such as amenity, maintenance, traffic safety, proper planning and sustainable development and environmental requirements.*
m) *To prohibit the discharge of additional surface water to combined (foul and surface water) sewers in order to maximise the capacity of existing collection systems for foul water. In areas where street scape enhancement or resurfacing is planned, seek to introduce NbSUDS to cater for rainfall run-off at source in order to maximize the capacity of existing collection systems for foul water.*

- **Objective EH O14 Nature Based Solutions:** *It is an objective of the Council to increase the use of Nature Based Solutions (NBS) throughout Limerick.*
- **Objective EH O15 Ground Water, Surface Water Protection and River Basin Management Plans:** *It is an objective of the Council to:*
    a) *Protect ground and surface water resources and to take into account the requirement of the Water Framework Directive when dealing with planning and land use issues.*
    b) *Implement the provisions of the River Basin Management Plan 2022 – 2028 and any succeeding plan. The filling of wetlands, surface water features and modifications and drainage of peatlands shall generally be prohibited.*
    c) *Implement the measures put forward in the Limerick Groundwater Protection Plan, in assessing planning applications and their consequences for ground water.*

The surface water from the site and access road will be dealt with through a series of gullies, filter drains, and where feasible, Sustainable Urban Drainage System (SuDS) incorporated into landscaping features as part of the proposed development.

SuDS features will be utilised to reduce the runoff from the site, generated when rainwater cannot infiltrate into the ground, as would be the case with the proposed roads, roofs and footpaths in the proposed development.

To reduce the overall runoff from the site, a series of SuDS measures are being considered to be designed and incorporated into the proposed development. These include the following:

- **Permeable Paving:** Permeable paving can be provided within parking bays within the site. This can provide additional surface water storage before connecting to the surface water network via filter drains.
- **Filter Drains:** Filter Drains can be provided for the new car park development, positioned alongside the permeable paving within the car parking bays. They will allow water to be clean, stored and conveyed further into the surface water network.

- **Hydrobrake:** A hydrobrake will be utilised in a final manhole leaving the site to limit discharge from the site to the existing greenfield run off rate from the site before development.
- **Soakaway:** A soakaway will likely be utilised to permeate all surface water outfalling from the site into the existing ground on the perimeter of the site. The suitability of which and size will be confirmed following review of the existing soil permeability properties bourn from existing information and further testing on site as required.

The SuDS System will be designed to ensure constructability (easy and safe construction), maintainability (easy and safe maintenance), cost-effectiveness and health and safety. While the SuDS measures used will reduce the runoff rate from the site, any remaining water will be discharged appropriately, to ensure no flooding will occur either within the site or within the surrounding environment as a result of the proposed development.

With regards to the foul drainage network and the watermain network, a pre connection enquiry will be prepared for the proposed development and submitted to Uisce Eireann.

5.0 Proposed Development

The proposed development comprises a flexible Open Cycle Gas Turbine (OCGT) generating plant with an electrical output of up to 385 MW. The plant is designed to provide fast-acting capacity and system support during peak demand and periods of low renewable generation. It will be primarily fuelled by natural gas, with secondary distillate (diesal) back-up for resilience and testing. Operation is characterised by rapid start-up, high ramp rates and limited annual running hours relative to baseload plant, facilitating renewable integration and grid stability.

Main components:

Gas turbine generator (OCGT) unit with associated enclosures, air intake, exhaust diffuser and CEMS-equipped stack; emissions abatement (e.g., SCR) will be provided as required to meet licence limits. The turbines will be hauled from Foynes Port which is located 5km to the north of the site.

Fuel systems: primary natural gas via new on-site AGI and short pipeline tie-in; secondary distillate storage and forwarding pumps for back-up.

Electrical systems: step-up transformer(s), switchgear and cable route(s) to the nearest 220 kV substation (allow flexibly regarding connection to 220kV network substation as the site may connect into OHL and even to new 220kV SS - we should say we believe there is good network capacity and we will connect to support demand).

Cooling and utilities: fin-fan coolers; demineralised water treatment and storage; raw/fire-water storage and firefighting systems; drainage/SuDS and wastewater management as required.

Buildings and yards: compact administration/workshop building; internal access roads; security fencing and lighting.

Grid and gas connections

A new electrical connection will be provided as part of a separate submission for the development, including the construction of a new EirGrid 220kV substation in accordance with EirGrid standards, in compliance with national grid requirements. The proposed electrical connections are to be confirmed and will be reviewed as part of the planning submission.

The primary fuel source for the Plant will be by natural gas, with secondary distillate (gas oil) back up for resilience and testing. Gas connections to the site were determined to approx. 300-500m from the

site, depending on the route taken to the existing large capacity gas network pipeline to accommodate the OCGT Plant.

The exact route taken will be determined nearer to the time of lodgement and will be submitted as a separate complementary application. However, the connection will be reviewed as part of the AA Screening undertaken by the environmental team.

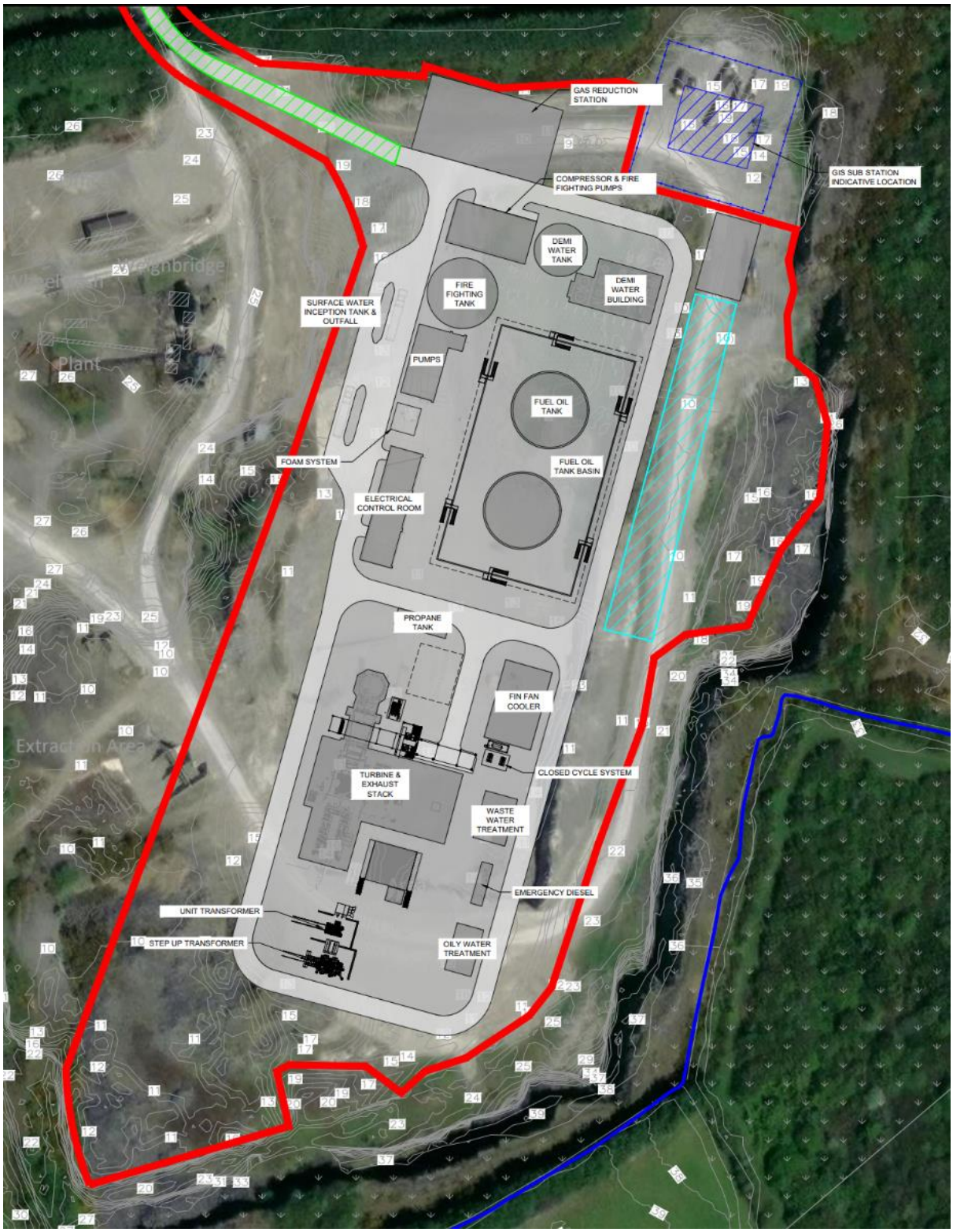

Figure 5-1: Proposed Site Layout Arrangement. Source: (ROD Drawing No. OCGT-ROD-BAR-XX-SK-CE-0002).

Construction and operation

Enabling works and civils, installation of plant, electrical and control systems, commissioning and performance testing.

Operational regime: peaking/intermediate service with rapid start; routine maintenance and periodic environmental monitoring in accordance with the EPA licence.

The construction traffic will peak at around 150 staff on site, while the operational phase will have around 3/4 staff on site.

5.1.1 Design Elements of the Proposed Development

The layout adopts a compact arrangement to minimise land-take and visual massing.

Key design controls include:

(i) keeping the stack height to the minimum necessary (anticipated 40-50 m) while ensuring dispersion performance;

(ii) acoustic treatment of major noise sources (turbine enclosure, intake, fin-fan coolers);

(iii) appropriate cladding/finishes in neutral tones;

(iv) provision for safe tanker access, fire-fighting and containment bunds; and

(v) clear segregation of electrical and fuel systems for safety.

5.1.2 Open Cycle vs Combined Cycle Technology

As set out above, the purpose of the proposed development is to provide backup or 'flexible' generation during critical periods when renewable energy sources are not sufficient. It is therefore essential that the project is designed to allow for a quick response to shortfalls in power generation at times of high demand. This is a critical factor when considering whether to use open-cycle or combined-cycle technology in the design of a peaking power plant. For the proposed development, open-cycle technology was selected and the rationale for this will be set out in detail in the EIAR which will accompany the planning application.

In summary, the open-cycle technology configuration provides a much quicker response time to start and begin generation in comparison to combined-cycle. This fast response time is required to meet the rapid changes in the transmission grid electrical supply and demand imbalance. The time to reach maximum load for an open cycle gas turbine is about 30 minutes but can be over 2 hours for a combined cycle.

Therefore, if EirGrid require 1 hour of generation at a given time, the combined cycle technology would combust fuel at various loads for at least 1.5 hours more than the open cycle technology before the required 1-hour operating period. On this basis, the combined cycle technology would be expected to consume more fuel for the total period and therefore produce more total emissions in the context of a peaking plant.

While it is acknowledged that over longer operating periods, combined cycle gas turbines are more efficient and produce less emissions per MW once operating at maximum load, for short generation periods to support the grid, the combined cycle can require more fuel to be combusted and therefore more emissions due to its much longer startup time compared to an open cycle. On this basis, an open cycle design is appropriate for the function of a Peaker Plant operating for occasional short peak periods to support the grid.

The consideration of reasonable alternatives, including alternative technologies, will be addressed in the EIAR which will accompany the planning application in accordance with the requirements of the EIA Directive.

5.1.3 Future Proofed for Future Decarbonisation

The use of natural gas to fuel the turbine is anticipated in national policy where flexible gas generation in support of renewable energy sources is recognised as a critical component of the achievement of energy security in Ireland.

As such the proposal is aligned with Government policy on security of electricity supply and the transitional pathway set out in national climate and energy policy as set out in the Climate Action and Low Carbon Development Act 2015, as amended by the Climate Action and Low Carbon Development (Amendment) Act 2021 (together the "Climate Act"), to achieve a climate neutral economy by no later than the end of 2050.

It is noted that the turbine is technically capable of operating on alternative gaseous fuels, including biomethane. This is subject to the future decarbonisation of the national gas network, as anticipated in relevant Government and gas system operator policy such as Gas Networks Ireland's (GNI) strategy for decarbonisation '*Pathway to a Net Zero Carbon Network'* published in 2024 and the *'National Biomethane Strategy*' published by the Government in 2024.

The Plant will operate on as much bio-methane as injected into GNI network in line with their 2040 vision. The Original Equipment Manufacturers (OEMs) confirmed they can use up to 30% H2 by volume and this figure is constantly increasing as technology develops. Therefore, the plant will be future proofed for lower carbon gas network as it materialises.

The Biomethane Energy Report produced by Gas Networks Ireland in 2023 concluded that:

> *'Ireland has stated its ambition is to produce up to 5.7 TWh of biomethane by 2030 amounting to approximately 10% of Ireland's current gas demand. Ireland has already been successful in supporting the development of renewable wind and solar energy and we need to leverage lessons from this to support the development of a biomethane industry. Learning from this experience and developing a biomethane industry with the appropriate scale for Ireland is of key importance.*
>
> *The build-up to 2030 will prove a critical period for Ireland in delivering on its biomethane potential. While the results represent an important indicator of the robustness of Ireland's biomethane production targets, it must be matched by new biomethane-specific policies, regulatory support and initiatives to ultimately deliver an affordable and reliable clean energy transition to biomethane. In order to deliver these benefits, we need a comprehensive biomethane strategy that provides clarity on appropriately balanced feedstocks, maximizing waste to energy options, ensuring community engagement and introducing appropriate market structures to ensure the industry grows in a sustainable manner.*
>
> *Gas Networks Ireland is ready to play its role in providing connections and injection facilities to support biomethane producers and suppliers in meeting Ireland's biomethane production ambition. In conclusion, Ireland has a real opportunity to develop a biomethane industry at scale, which will offer multiple benefits for our agricultural economy, assist in the decarbonisation of Ireland's economy more generally, enhance our security of energy supply and lead to the development of a key renewable indigenous energy resource in the build-up to 2030.'*

5.2 EIA Threshold

Ireland's list of Projects for which an EIA is required are set out in Part 1 and Part 2 of Schedule 5 of the Planning and Development Regulations 2001-2018. This list was developed from Annex I and

Annex II of the EIA Directive. The proposed activity is not directly listed under Annex I of the EIA Directive, or Part 1, Schedule 5, or Part 2, Schedule 5.

A closely related development class in the context of the proposed Project under Part 1, Schedule 5 is Class 2(a): "*A thermal power station or other combustion installation with a heat output of 300 megawatts or more.*"

The proposed Project has a combined thermal input of 385MW, which exceeds the limit, quantity / threshold set out in Part 1, Schedule 5 is Class 2(a).

Additionally, a further a closely related development class in the context of the proposed Project under Part 2, Schedule 5 is Class 3(a) is: *"Industrial installations for the production of electricity, steam and hot water not included in Part 1 of this Schedule with a heat output of 300 megawatts or more."* Again, the proposed development exceeds the limit, quantity or threshold set out in Part 2, Schedule 5 is Class 3(a). Therefore, an Environmental Impact Assessment Report will be required for the site.

Given the scale of the development, an Environmental Impact Assessment Report (EIAR) will accompany the application in accordance with the EU EIA Directive 2011/92/EU, as amended by EIA Directive 2014/52/EU and the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018, in order to inform the consideration of the Application and provide ACP with the environmental information that must be taken into account when determining the Application.

The proposed development will be subject to various other consents, permits and licences. A brief outline of these are provided below:

5.1.1 Industrial Emissions Directive Licence [IED License]

The applicant will be required to obtain an Industrial Emissions Licence (IEL). This will be done once planning permission has been obtained. This permit provides authorisation to the holder to carry out named activities which result in emissions of carbon dioxide from certain emission points. It also includes requirements that must be met with regard to such emissions, including reporting and monitoring requirements.

5.2.2 Connection Agreement to the National Electricity Grid

Discussions will be required with EirGrid to confirm the feasibility of connecting the Proposed Development to the transmission grid. A formal application will be made once the design has been finalised. The proposed development will connect into the Tarbert / Killonan 220 kV line.

5.2.3 Generator Licence from the CRU

To connect to the electricity network, a generator who wishes to connect must hold an Authorisation to Construct or Reconstruct a Generating Station and a Generator Licence. The CRU is responsible for assessing these permits. The applicant will need to apply for this once planning permission has been obtained.

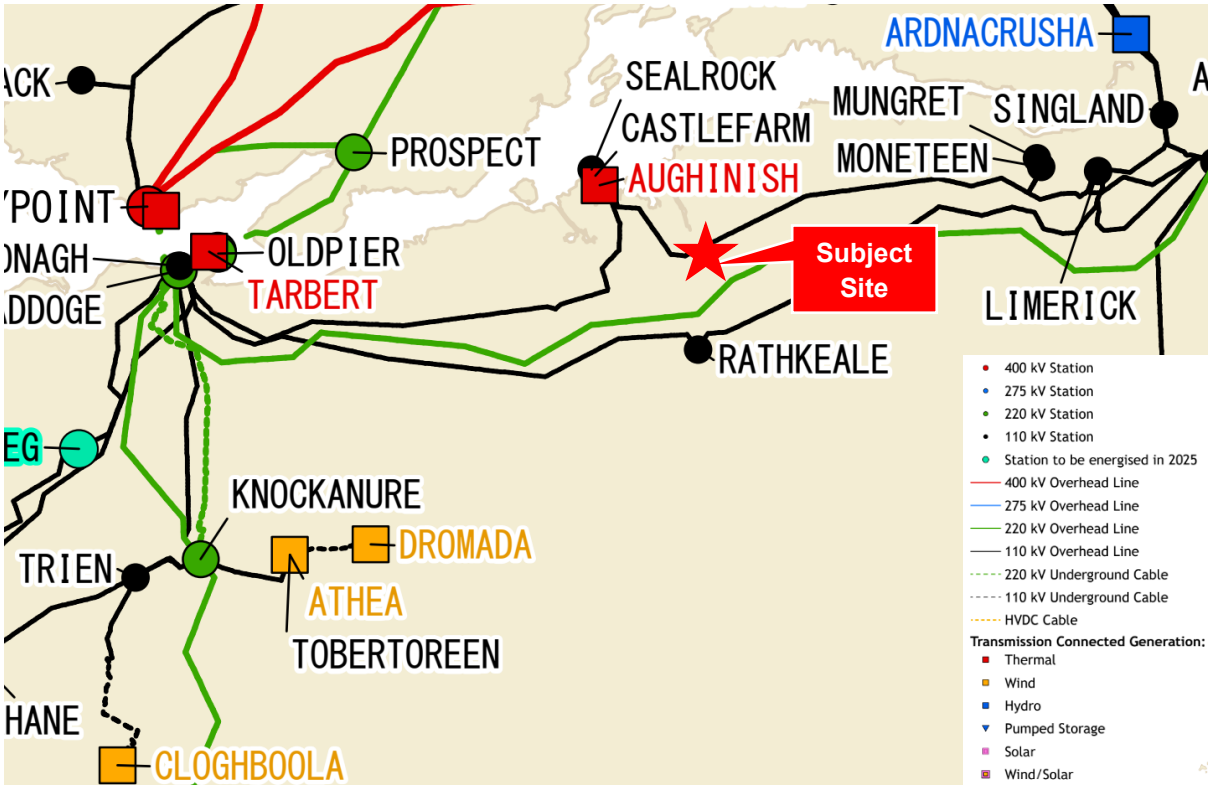

Figure 5-2 Location of subject site in relation to the existing EIRGRID Network (excerpt from 2025 EIRGRID Transmission Network Map).

5.3 Principle of the Proposed Development

The following section sets out the need for the project with specific reference to the policy support for the project, the rationale for open-cycle vs combined-cycle technology and the operational lifespan proposed. The purpose of this project is to enhance the capacity of the national grid by providing additional generating power when renewable energy production is insufficient to meet demand. Operating as a 'peaker plant' with minimal annual use (i.e. anticipated to be in the order of 1800 hours per annum though actual dispatch will be determined by system requirements), the facility will provide backup or 'flexible' generation during critical periods when renewable energy sources are not sufficient to meet demand.

The proposed development will act as a reliable source of backup generation when the system margins are tight. It is forecast to displace the running of existing, higher carbon emitting units such as oil-fired units. The proposed development is expected is expected to provide a reduction in the level of carbon emissions. The proposed development meets a need for electricity generation that has been signalled by the Government as being an urgent and appropriate response to the transition to a renewables based national energy supply.

6.0 Opinion on SID

6.1 Definition of Strategic Infrastructure Development

The 7th Schedule to the 2000 Act (as amended) lists the classes of infrastructure development which, require direct application for permission to An Coimisiún Pleanála as Strategic Infrastructure Development (SID).

To qualify as SID, a proposed development must first come within the scope of one or more of the classes and comply with the thresholds contained in the 7th Schedule,

We consider the key elements of the development proposal in the context of the 7th schedule classes and the thresholds for SID below.

- is of strategic economic or social importance to the State or the region in which it would be situate,
- would contribute substantially to the fulfilment of any of the objectives of the National Planning Framework or in any regional spatial and economic strategy in respect of the area or areas in which the development would be situate,
- would have a significant effect on the area of more than one planning authority.

The Class 1 of the 'Seventh Schedule' relates to the energy infrastructure under the Planning and Development Act 2000 (as amended) ('the Act') and includes the following category of the development ('*A thermal power station or other combustion installation with a total energy output of 300 megawatts or more'*).

6.2 Proposed Development

The proposed scheme comprises of Open Cycle Gas Turbine (OCGT) with total energy output of 385MW. This will constitute 'Strategic Infrastructure Development' (SID) under Section 37A of the Act, as it surpasses the threshold set out:

> '*A thermal power station or other combustion installation with a* ***total energy output of 300MW*** *or more".* [Emphasis Added].

Given the scale of the proposed, we are seeking a determination from ACP as the proposed development falls within the definition of energy infrastructure in the Seventh Schedule of the Planning and 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 Section 37A(2)(a), and 37A(2)(b), of the Planning and Development Act 2000, as amended. An application for permission for the proposed development must therefore be made directly to An Coimisiún Pleanála under Section 37E of the Act.

However, in order to proceed with the planning application for the forthcoming development of the lands for energy purposes, we would be appreciate confirmation, by way of a determination from ACP.

7.0 Conclusion

In view of the foregoing, it is our considered opinion that the proposed development will constitute 'Strategic Infrastructure Development' (SID) under Section 37A of the Act and that a planning application should be made to An Coimisiún Pleanála, in the first instance.

It is noted that a copy of the application, accompanying documents (including EIAR) and a copy of the public notice will be provided for the list of prescribed bodies provided by the Coimisiún.

Stephen Purcell

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For and on behalf of KPMG Planning

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