SSE Generation Ireland Limited

Planning Statement

SSE Tarbert Next Generation Power Station

November 2023

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Executive Summary

- This Statement is submitted to An Bord Pleanála in support of a Strategic Infrastructure Development ('SID') planning application by SSE Generation Ireland Limited.[1] ('the Applicant') for a new 350 MW Open Cycle Gas Turbine ('OCGT') power plant fuelled by Hydrotreated Vegetable Oil ('HVO') along with associated buildings, plant, site works, services and ancillary development on land within the existing SSE Tarbert Power Station site at Tarbert Island, Tarbert, Co. Kerry[2].

- The Applicant is an SSE Thermal Generation Holdings Limited Company, wholly owned by SSE plc. SSE is a leading developer, owner and operator of flexible generation, energy-from-waste, and energy storage assets, with over six hundred direct employees across the UK and Ireland. SSE's vision is to become the leading provider of low-carbon flexible thermal energy in a net-zero world.

- The application Site boundary ('red line') encloses an area of approximately 15.18 hectares (ha.) and lies within the boundary of the existing SSE Tarbert Power Station. A description of the Site and its surroundings is provided in Section 2 of this Statement.

- The main element of the Proposed Development is an OCGT power plant fuelled by HVO. The power output of the plant will be controlled and limited to a maximum of 350MW.

- The OCGT plant will connect via an overhead cable, 75m in length, to an existing 220kV electrical substation to the immediate south.

- There will be no alterations to the electricity transmission system outside of the Site as part of the Proposed Development.

- The plant will operate as a 'peaking plant', spending most of its time on standby, only being run for relatively short periods of time when there is insufficient electricity being generated from renewable technologies to meet the country's needs.

- The key objective of the development is to facilitate the continued expansion of Ireland's renewable generation capacity by providing a back-up source of power generation, thereby helping to maintain security of supply at times when renewable sources are not sufficient to meet demand.

- The need for development of this type is clearly established, as detailed in Section 3 of this Statement. The National Development Plan (2021-2030) (NDP) is clear that

[1] Address: Red Oak South, South County Business Park, Leopardstown, Dublin 18, Dublin, D18 W688. SSE Generation Ireland Ltd. Isan SSE Thermal Generation Holdings Limited Company, wholly owned by SSE plc.
[2] A full description of the Proposed Development is provided in Chapter 5 of the submitted Environmental Impact Assessment Report (EIAR).

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 ('CAP23') also emphasises the need for urgent delivery of new conventional generation capacity.

- The application is supported by a comprehensive Environmental Impact Assessment Report ('EIAR') and Natura Impact Statement ('NIS'). The Proposed Development is predicted to have limited environmental effects as evidenced in the EIAR, which concludes that there will be no significant effects from the Proposed Development, as the design and embedded mitigation measures which are set out in the EIAR will be adhered to. . The submitted NIS concludes that, provided certain mitigation measures are implemented, the Proposed Development will have no adverse effects on the integrity of any European site, either alone or in combination with other plans or projects.

- The Proposed Development is consistent with, and contributes towards, the achievement of proper planning and sustainable development of the area in which it is located, in line with the policies and objectives of the relevant statutory plans, as detailed in Section 6 of this Statement. Notably, it will contribute toward the achievement of national targets to deliver circa 2 GW of new dispatchable generation capacity by 2030 in order to maintain security of supply during this period of transition toward a more renewables-based system.

- The Proposed Development will contribute to the transition toward a low-carbon economy as envisaged in the Kerry County Development Plan, the National Planning Framework ('NPF'), the NDP and the Climate Action Plan by supporting the transition to a more diverse renewables-based power generation system. It will also safeguard the role and function of the Power Plant Hub at Tarbert as a key driver of economic growth for the region, in accordance with Development Plan policy.

- The Proposed Development will provide a range of benefits:
    - 350MW additional generation capacity to meet increasing electricity demand and address forecast capacity shortfalls;
    - The power plant will run on HVO, which is a lower net carbon option for use in power generation;
    - Significant private sector capital investment in the regional economy;
    - Up to 200 construction phase jobs as well as supply chain opportunities for local businesses;
    - Long term local employment during the operational phase, with up to 14 qualified personnel required for the operation, maintenance and management of the plant;

- Efficient use of brownfield land used as part of a Power Station, benefitting from existing transmission infrastructure;
- Potential for conversion to hydrogen use in the future, subject to planning permission;
- Supports economic development objectives which rely on secure energy supply;
- The applicant is committed to the provision of a community gain proposal linked to the Proposed Development. Building on pre-application engagement, the applicant will continue to work collaboratively with the local community and stakeholders, through ongoing consultation, to understand the principles that this should be aligned with.

- Considering the urgent need for the Proposed Development, its compliance with planning policy and its limited environmental impact, it is respectfully requested that planning permission is granted for this much-needed development without delay.

1.0 Introduction

1.1 This Statement is provided in support of a Strategic Infrastructure Development ('SID') planning application by SSE Generation Ireland Ltd.[3] ('the Applicant') for a 350MW Open Cycle Gas Turbine ('OCGT') power plant fuelled by Hydrotreated Vegetable Oil ('HVO') along with associated buildings, plant, site works, services and ancillary development on land within the existing SSE Tarbert Power Station site at Tarbert Island, Tarbert, Co. Kerry.

Description of Development

1.2 The Proposed Development description, as contained on the statutory notices for the planning application, reads as follows:

Demolition of existing structures on site (Including workshop and storage buildings, shot blasting shed, lube oil store, toilet block, chemical storage bund, boiler wash storage tank, canteen, demineralised water tank, water treatment plant building and associated infrastructure, 'puraflo' wastewater treatment plant, tanks and fuel lines); Construction of OCGT power plant (350MW), and associated building (30m high) including air intake; Emissions stack (55m high) with continuous emissions monitoring systems ('CEMS'); Selective Catalytic Reduction ('SCR') with air intake, filters and dilution fans; Skids; 2no. blocks of fin fan coolers; Power control module; Emergency generator; One unit transformer and one grid transformer with a firewall separating, and overhead cable connection to existing 220kV substation; Aqueous ammonia tank; Propane gas tank, compound and unloading bay; Demineralised water treatment plant; 2no. Demineralised water storage tanks; Raw water and fire water storage tank; Fire water module; 3no. fuel storage tanks with 2no. unloading bays; Fuel polishing and transfer system; Fuel pipework; Wastewater treatment plant; Administration building and workshop with associated car parking area (8no. spaces); Store; Flood defence wall and gates; And all associated ancillary development, site works and services including internal roads, security fencing and gates, drainage infrastructure, lighting, underground pipework and cabling.

1.3 The main component of the Proposed Development is a 350 MW OCGT power plant, fuelled by HVO, which will operate as a 'peaking plant'. The proposed OCGT will be capable of starting up rapidly to provide backup power generation when there is a gap between renewable power generation and demand. It will help to facilitate the continued expansion of Ireland's renewable generation capacity while maintaining security of supply.

1.4 HVO is a biofuel that is produced by processing waste feedstocks to create a fossil-free alternative to distillate-oil in accordance with European Union (EU) sustainability standards. HVO provides a transitional step away from fossil fuels and a move towards

[3] Red Oak South, South County Business Park, Leopardstown, Dublin 18, Dublin, D18 W688

a more decarbonised power system by providing dispatchable renewable electricity. It has lower greenhouse gas emissions profile across its lifetime when compared to alternatives such as diesel or natural gas combustion. The Proposed Development will also provide the potential for conversion to hydrogen use in the future (subject to planning permission), and represents a long-term sustainable generation asset for national grid.

1.5 Electricity transmission will be entirely ancillary to the plant, carrying electricity, via overhead cables, from the main and auxiliary transformers to the existing electrical substation to the south of the proposed plant. There are no alterations proposed to the electricity network outside of the Site. The presence of existing electricity transmission infrastructure at Tarbert HFO Power Station[4] is a key benefit of the site.

1.6 The other key elements of the Proposed Development are the fuel storage tanks, fuel polishing and transfer system, water storage tanks and treatment plant, administration building and workshop, store, a new wastewater treatment plant, flood defence wall and gates, and associated balance of plant and equipment.

1.7 The Proposed Development will include the demolition of a number of existing structures on site, but not the existing Tarbert Heavy Fuel Oil ('HFO') Power Station building.

1.8 The existing HFO Power Station is due to close by the end of 2023. As it is an Environmental Protection Agency (EPA)licensed facility, it will be subject to a site closure and restoration/aftercare plan to be agreed with the EPA in accordance with its license. ,

Need for Development

1.9 The Proposed Development is urgently needed to provide added resilience to Ireland's electrical generation capacity and address forecast capacity shortfalls in the coming years.

1.10 The need for the Proposed Development is clearly established. The National Development Plan (2021-2030) (NDP)[5] 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'[6], published in November 2021, and Eirgrid's 'Ireland Capacity Outlook 2022 –

[4] The existing power station built in the 1960's, which runs on Heavy Fuel Oil (HFO). The existing station will cease operating in December 2023.
[5] https://www.gov.ie/en/publication/774e2-national-development-plan-2021-2030/
[6] https://www.gov.ie/en/publication/a4757-policy-statement-on-security-of-electricity-supply/#

2031', published in October 2022[7]. The latest Climate Action Plan ('CAP23') also emphasises the need for urgent delivery of new conventional generation capacity[8].

1.11 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.

1.12 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.

1.13 New conventional dispatchable generation capacity, in particular 'open cycle' technology which can respond quickly to shortfalls in power generation at times of high demand, is therefore essential and its delivery must be prioritised. This has been emphasised in a Departmental Circular Letter (12/2021) issued to An Bord Pleanála and the Directors of Planning of each local authority in December 2021. The Departmental Circular states that *"the development of new conventional generation (including gas-fired and gasoil distillate-fired generation) is a national priority"* and that the determination of applications for such infrastructure *"should be prioritised as much as possible"*.

1.14 The latest Climate Action Plan further emphasises the need for urgent delivery, stating that rapid delivery of flexible generation capacity is required *"at scale and in a timeframe to replace emissions from coal and oil generation before the second budget period"* (2026-2030)[9].

1.15 The Proposed OCGT plant is exactly the type of flexible generation capacity that is required. It provides quick response generation capability which will help to maintain security of supply while supporting Ireland in its transition to a low carbon economy in line with NDP and CAP23 objectives. It will also help to replace generation capacity

[7] https://www.eirgridgroup.com/site-files/library/EirGrid/EirGrid_SONI_Ireland_Capacity_Outlook_2022-2031.pdf
[8] https://www.gov.ie/en/publication/7bd8c-climate-action-plan-2023/
[9] CAP23, p. 123

that will be lost through the planned retirement of more carbon-intensive power stations in the coming years.

1.16 The Applicant is acutely aware of the unprecedented pressure on the national grid at present and is committed to optimising the contribution of the Site and adjoining lands to maintaining security of supply.

1.17 The need for the Proposed Development is considered further in Section 3 of this Statement.

Seventh Schedule Development

1.18 As the total energy output of the proposed development will be 350MW it constitutes 'Seventh Schedule' development under the Planning and Development Act 2000 (as amended) ('the Act') (*'A thermal power station or other combustion installation with a total energy output of 300 megawatts or more'*). It constitutes 'Strategic Infrastructure Development' (SID) under Section 37A of the Act, as it is clearly of strategic economic importance to the State and the region in which it would be situated, and will contribute substantially to the fulfilment of national and regional planning objectives. An Bord Pleanála (ABP) has confirmed its opinion, by notice dated 16th October 2023[10], that the Proposed Development would be strategic infrastructure within the meaning of Section 37A of the Act, and that an application must be made directly to it accordingly under S37E of the Act.

Location of Development

1.19 The Proposed Development is situated on a previously developed area of the existing Tarbert HFO Power Station site, which is positioned on Tarbert Island, approximately 1.8km north of the town of Tarbert in Co. Kerry.

1.20 The Site area measures 15.18 hectares and is wholly located within the administrative area of Kerry County Council ('GKCC'). A description of the Site and its surroundings is provided in Section 2.

1.21 The Site's position within the existing industrial context of the Tarbert Power Station site (A recognised 'Power Plant Hub' under the Kerry County Council Development Plan 2022-2028 ('the County Development Plan'[11]), adjoining existing transmission infrastructure, makes it ideally suited for the type of development proposed.

Compliance with Policy

1.22 This Statement demonstrates that the Proposed Development is consistent with, and contributes towards, the proper planning and sustainable development of the area

[10] ABP-316229-23
[11] Kerry CDP, Policy 9-26

which it is located, in line with the policies and objectives of the relevant statutory plans.

1.23 The applicable policy context is outlined in Section 4 of this Statement.

Development Benefits

1.24 The Proposed Development will provide a range of important benefits:

- 350MW additional generation capacity to meet increasing electricity demand and address forecast capacity shortfalls;
- The power plant will run on HVO, which is a lower net carbon option for use in power generation;
- Significant private sector capital investment in the regional economy;
- Up to 200 construction jobs as well as supply chain opportunities for local businesses;
- Long term local employment during the operational phase, with up to 14 qualified personnel required for the operation, maintenance and management of the plant;
- Efficient use of brownfield land at the Tarbert HFO Power Station Site, benefitting from existing transmission infrastructure;
- Potential for conversion to hydrogen use in the future (subject to planning permission);
- Supports economic development objectives which rely on secure energy supply;
- The applicant, is committed to the provision of a community gain proposal linked to the Proposed Development. Building on pre-application engagement, the applicant will continue to work collaboratively with the local community and stakeholders, through ongoing consultation, to understand the principles that this should be aligned with.

1.25 The application is supported by a comprehensive EIAR and NIS. This Statement should be read in conjunction with the EIAR and NIS, which have been prepared by AECOM on behalf of the Applicant.

1.26 This Planning Statement provides detail on the Site, the nature and extent of the Proposed Development, the planning context applying and the comprehensive assessment of environmental impact that has been undertaken. It should be read in conjunction with the full suite of drawings and documents submitted with the application, and is set out as follows:

- Section 1 - Introduction
- Section 2 - Site Details

- Section 3 - Proposed Development
- Section 4 - Policy Context
- Section 5 - Environmental Impact
- Section 6 - Planning Assessment
- Section 7 - Conclusion

2.0 Site Details

2.1 Site and Surrounding Area

2.1.1 The Site of the Proposed Development comprises a previously developed area of the existing Tarbert HFO Power Station, which is positioned on Tarbert Island, approximately 1.8km north of the town of Tarbert in Co. Kerry. Tarbert Power Station is accessed via the N67, a National Secondary Road which connects the Site to the N69 Tralee / Limerick Road, located approximately 1.8km to the south.

2.1.2 The existing Power Station site, as a whole, including the Tarbert HFO Power Station, Temporary Emergency Generation ('TEG') Power Plant (under construction), the National Oil Reserves Agency ('NORA') tank farm and an existing jetty facility(Referred to as 'SSE Tarbert'), comprises an area of c. 42 hectares. It is located on the southern shore of the Shannon Estuary. The area of the Proposed Development, which sits entirely within the existing Power Station site, is c. 15.18 hectares.

2.1.3 The existing generating station at SSE Tarbert was developed in the 1960's. It is a 626MWe HFO fired power plant, which commenced operations in 1969. There are four generating units at the station, two with a capacity of 57MWe each and two with a capacity of 256Mwe each.

2.1.4 The Tarbert HFO Power Station was constructed in two stages, with units one and two commissioned in 1969 and units three and four commissioned in 1976 and 1977. Units three and four were refurbished in 2003 and 2004 and are fuelled by HFO, with both gas oil and propane used as a start-up fuel. Each of the units are independent and consist of a coiler, steam turbine and auxiliary plant.

2.1.5 The existing Power Station is due to close by the end of 2023.

2.1.6 There is an 'Island Tank Farm' to the west of the proposed OCGT development, which comprises four HFO tanks, each with a capacity of 25,000 tonnes. At present, only two of these tanks are in use. The tanks located further south of the Site are not related to the power generation which occurs at SSE Tarbert and are used by the National Oil Reserves Agency ('NORA').

2.1.7 To the south-west of the Proposed Development is an area[12] that has been approved for use for Temporary Emergency Generation ('TEG') under Section 4 of the Development (Emergency Electricity Generation) Act 2022[13]. Works have commenced on this site for the installation of 3no. OCGT units with a combined capacity of

[12] Previously approved for a battery storage facility – Planning Reg. Ref. 18392
[13] ABP-315838-23 refers

150MW. This temporary plant is expected to commence decommissioning in 2028/29.

2.1.8 The Site's position within the existing industrial context of Tarbert Power Station, adjoining existing transmission infrastructure, makes it ideally suited for the type of development proposed.

2.1.9 The Site of the Proposed Development is surrounded by the following features:

- North – Outbuildings, storage tanks, Tarbert Lighthouse and the Shannon Estuary;
- East – The existing Tarbert HFO Power Station, staff car parking and visitors' car parking areas, the northern site entrance and the Shannon Estuary;
- South-east – Existing site reservoir, the Tarbert – Killimer ferry terminal and the N67 National Secondary road;
- South – 110kV and 220kV electrical transmission substations and a lagoon draining the Shannon Estuary and agricultural lands further south;
- South-west – the TEG site and the National Oil Reserves Agency (NORA) tank farm; and
- West – HFO fuel storage tanks.

2.1.10 Within the vicinity of the complex there are a number of residential dwellings and a public house (currently closed) located close to the existing entrance off the N67. Agricultural lands lie further to the south.

2.1.11 The Site is located adjacent to the Lower River Shannon Special Area of Conservation (SAC) and the River Shannon and River Fergus Estuaries Special Protection Area (SPA). Tarbert Bay is also a proposed Natural Heritage Area (pNHA).

2.2.12 Further details of the Site and surrounding environment are available within the EIAR Chapter 4 ('Existing Site and Conditions').

2.2.13 The Proposed Development provides a valuable opportunity to make more efficient use of underutilised brownfield land adjoining an existing power station (that is to be decommissioned) and associated infrastructure.

2.3 Planning History

2.3.1 The table below provides a list of relevant planning approvals (and a live development proposal awaiting decision) within the Power Station site. It should be noted that the site of the proposed OCGT development was previously approved for a SID proposal to be delivered in two phases: 1) a 305MW gas-fired OCGT unit and 2) Balance of plant to deliver a 450MW Combined Cycle Gas Turbine (CCGT) (ABP Ref. 08.PA0017). The permission was not implemented.

Planning Application	Date Submitted	Summary Details	Applicant	Status
23350	31/03/2023	Underground electricity cabling and new switchgear bay within existing substation	Eirgrid PLC	Pending Decision
ABP-315838-23	17/02/2023	Application received under Section 4 of the Development (Emergency Electricity Generation) Act 2022 (the Act) for a designated development located at Tarbert Power Station, Tarbert, in the townland of Tarbert Island, Co. Kerry - Installation of three OCGT units which will collectively have the capacity to generate 150MWe of temporary emergency electricity, site development and associated ancillary works required for the operation of the plant. The plant will operate as an emergency plant, with a maximum running time of 500 hours per annum.	SSE Generation (Ireland) Limited	29/03/2023 Conditions Recommended
18392	27/04/2018	Tarbert Island Tarbert Co Kerry construct a battery storage facility within a total Site area of up to 2.278ha, to include 50 no. self- contained battery container units with associated HVAC cooling units, 13 converter and 13 step up transformer container units, associated compound cabling and ducting, a grid transformer, a single storey substation / control building with welfare facilities, a cable route grid connection to the existing ESB substation building, maintenance lighting, security fencing, a CCTV	SSE Renewables (Ireland) Limited	Granted Conditional 15/01/2019

Planning Application	Date Submitted	Summary Details	Applicant	Status
		monitoring system, and all associated ancillary infrastructure on lands within the Tarbert generating facility. A ten-year planning permission is being sought to construct the development		
13477	31/07/2013	Alter existing 220kV station consisting of new single storey control building, new diesel generator building, 3.no single storey modular buildings, 6.no gantry support structures 8 no. control and protection kiosks, 6 no. surge arrestors, 6 no. cable sealing ends, existing compound chain link fence and gates to be replaced with new palisade fence and gates, new holding tank and associated drainage and Site works	EirGrid Plc	Granted Conditional 23/09/2013
08.PA0017	17/12/2009	Construction Of A 450 MW Natural Gas-Fired Combined Cycle Gas Turbine	Endesa Ireland Limited	Granted Conditional 06/12/2010
972500	04/12/1997	Erection of a sewage effluent treatment plant	Electricity Supply Board (ESB)	Granted Conditional 03/03/1998
921738	26/11/1992	Erect office extension	ESB	Granted Conditional 15/01/1993

Table 2.1 Site planning history

3.0 Proposed Development

3.1 The Applicant

3.1.1 The Applicant, SSE Generation Ireland Limited, part of the FTSE-listed SSE plc, is a leading developer, owner and operator of flexible generation, energy-from-waste, and energy storage assets, with over 600 direct employees across the UK and Ireland. SSE's vision is to become the leading provider of flexible thermal energy in a net-zero world. SSE Generation Ireland Ltd. owns and operates the existing Tarbert Power Station.

3.1.2 The Applicant is also responsible for the construction and operation of the 'TEG' development to the south-west of the Proposed Development site (Ref: ABP-315838-23). This comprises 3no. 50MW OCGT units which will operate for a maximum of 500 hours per annum and will be in situ for five years only. Following this time, the units will be decommissioned, dismantled, and removed from the SSE Tarbert site.

3.2 Need for the Proposed Development

3.2.1 The Proposed Development will play an important role in maintaining security of energy supply. The National Development Plan (2021-2030) (NDP)[14] 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'[15], published in November 2021, and Eirgrid's 'Ireland Capacity Outlook 2022 – 2031', published in October 2022[16]. The latest Climate Action Plan ('CAP23') also emphasises the need for urgent delivery of new generation capacity.

3.2.2 The Proposed Development is urgently needed to provide resilience to Ireland's electricity grid and address forecast electricity capacity shortfalls. The proposed OCGT peaking plant will support intermittent renewable generation technologies by running for short periods of time when there is insufficient electricity being generated from renewable technologies to meet demand. It will also help to replace generation capacity lost through the planned retirement of more carbon-intensive power stations.

3.2.3 The Climate Action Plan 2023 (Published December 2022) sets out a 'roadmap' to achieve a net zero carbon energy system by 2050. It commits Ireland to aim for up to 80% of its electricity supply to be generated from renewables by 2030, with no generation from peat and coal. For the electricity sector, the need for additional

[14] https://www.gov.ie/en/publication/774e2-national-development-plan-2021-2030/
[15] https://www.gov.ie/en/publication/a4757-policy-statement-on-security-of-electricity-supply/#
[16] https://www.eirgridgroup.com/site-files/library/EirGrid/EirGrid_SONI_Ireland_Capacity_Outlook_2022-2031.pdf

flexible generation capacity is clear. The Plan states that '*rapid delivery of flexible… generation is needed at scale and in a timeframe to replace emissions from coal and oil generation before the second budget period*' (i.e. 2026 – 2030)[17]. Accordingly, the key measures for the sector include that *"The CRU and Eirgrid will ensure an adequate level of conventional dispatchable generation capacity and deliver at least 2 GW of new flexible…generation"*[18].

3.2.4 The need to develop new backup power generation plants, such as the proposed development, to facilitate the increased uptake of renewable technologies and support the Government's climate reduction targets, as well as providing improved security of supply, is well established.

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

3.2.5 'Ireland's Transition to a Low Carbon Energy Future 2015- 2030' (Government White Paper) sets out a framework to guide National policy in the energy sector up to 2030 and, in some cases, to 2050, taking account of European and international climate change objectives.

3.2.6 The 'Energy Vision 2050' established in the White Paper aims to reduce greenhouse gas (GHG) emissions from the energy sector to between 80% and 95% of 1990 levels. To achieve this transition to low carbon energy, energy supply will need to be diversified to include a greater share of renewable generation sources and shift away from reliance on carbon-intensive fuels such as peat and coal in favour of lower carbon fuels like HVO. 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"[19].

"Onshore wind continues to be the main contributor (18.2% of total generation and 81 % of RESE in 2014). It is a proven technology and Ireland's abundant wind resource means that a wind generator in Ireland generates more electricity than similar installations in other countries. This results in a lower cost of support. Due to the variability of wind conditions, wind generation poses challenges to the operation of electricity grids. In Ireland, these challenges are being addressed by the electricity system operators under their DS3 programme[20]*". (emphasis added)*

[17] CAP23, Page 123
[18] CAP23, Page 139
[19] Paragraph 103, Government White Paper – Ireland's Transition to a Low Carbon Energy Future 2015-2030 (19/06/2020) Department of the Environment, Climate and Communications
[20] Paragraph 128, Government White Paper – Ireland's Transition to a Low Carbon Energy Future 2015-2030 (19/06/2020) Department of the Environment, Climate and Communications

3.2.7 The Proposed Development will provide quick response capabilities to EirGrid as part of the DS3 Programme ('Delivering a Secure, Sustainable Electricity System') and, into the future, the 'Shaping Our Electricity Future' Programme. It will help to ensure that the electricity grid network can operate reliably and efficiently with the integration of additional renewable generation.

National Development Plan 2021-2030

3.2.8 The renewed NDP was published on 4th October 2021 and will guide national investment decisions up to 2030. The NDP aims to facilitate the implementation of the 'National Strategic Outcomes' contained in the National Planning Framework (NPF) and address the challenges posed by current issues such as climate action and population growth.

3.2.9 In the context of the energy sector, the principal objective of the NDP is to assist in ensuring a *'long-term, sustainable and competitive energy future for Ireland'.*

3.2.10 The NDP's focus for investment in the energy system is to:

- *'ensure that it meets the challenge of integrating world-leading levels of renewable wind and solar electricity whilst ensuring security of supply; and*
- *ensure that it is fit for purpose in the medium- to longer-term in order to meet projected demand levels.*[21]*'*

3.2.11 The NDP emphasises that ensuring continued security of energy supply is a priority at national level and within the overarching EU policy framework and acknowledges that achieving the decarbonisation of energy supply presents a significant challenge in the face of rapidly increasing electricity demand.

3.2.12 Energy demand over the next 10 years will be driven by increasing demand from large energy users, continued population growth and the increased electrification of transportation and buildings. For example, the NDP notes that '*electricity demand from large energy users, including data centres, is forecast to grow to up to 27% of total power demand in 2030*[22]*'.*

3.2.13 The NDP commits to achieving up to 80% of Ireland's electricity capacity from renewable sources by 2030, which will require investment in renewable electricity generation and storage as well as conventional, dispatchable generation capacity to support the operation of variable renewable technologies and provide security of

[21] p 126, National Development Plan 2021-2030 (4/10/2021) Department of Public Expenditure and Reform
[22] p 123, National Development Plan 2021-2030 (4/10/2021) Department of Public Expenditure and Reform

supply. The NDP aims to deliver circa 15.5 GW of renewable generation capacity over the next ten years alongside circa 2 GW of conventional capacity[23].

3.2.13 Strategic Investment Priority no. 4 of the NDP aims to:

'*deliver circa 2 GW of new conventional (mainly gas-fired) electricity generation capacity to support the operation of a predominantly wind/solar electricity system and provide security of supply for when variable electricity generation (wind/solar) is not sufficient to meet demand[24]'.*

3.2.14 The NDP notes that, notwithstanding the significant investment in conventional generation capacity that is required over the next ten years, the proportion of electricity generated by conventional technology will decrease, as *'conventional generation plant will spend much of its time in reserve and will only operate when required to balance the system in times of high demand and low wind/solar generation[25].'*

Ireland Capacity Outlook 2022-2031

3.2.15 Eirgrid's latest capacity outlook identifies capacity deficits for each year up to 2031. It states that *"there is no question that the current outlook, based on the best information available, is serious"* and that, to address the challenge, *"a balanced portfolio of new capacity is required".* It highlights the need for *"the delivery, through the all-island capacity auctions, of over 2,000 MW of enduring flexible…generation capacity"* by 2030 alongside additional measures including the procurement of temporary emergency generation capacity and extending the operation of older generators[26].

National Hydrogen Strategy

3.2.16 The National Hydrogen Strategy identifies flexible power generation – such as the Proposed Development - as one of the first sectors that will develop as a significant end-user of renewable hydrogen but recognises that the transition to hydrogen will take time and it will not be until mid to late 2030s that a national hydrogen network emerges.

3.2.17 The Proposed Development will be fuelled by low carbon HVO – which has a lower greenhouse gas emissions profile across its lifetime when compared to alternatives such as natural gas – but will also provide the potential for conversion to hydrogen

[23] p 122, National Development Plan 2021-2030 (4/10/2021) Department of Public Expenditure and Reform
[24] p 123, National Development Plan 2021-2030 (4/10/2021) Department of Public Expenditure and Reform
[25] p 125, National Development Plan 2021-2030 (4/10/2021) Department of Public Expenditure and Reform
[26]https://www.eirgridgroup.com/sitefiles/library/EirGrid/EirGrid_SONI_Ireland_Capacity_Outlook_2022-2031.pdf, pages 4 – 6

use in the future (subject to planning permission). It will provide a long-term sustainable generation asset for the national grid.

Summary

3.2.18 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. It provides quick response generation capability which will help to ensure security of supply over the coming years.

3.3 Description of Development

3.3.1 The Proposed Development comprises an Open Cycle Gas Turbine (OCGT) power plant, fuelled by HVO, along with associated buildings, plant, site works, services and ancillary development.

3.3.2 The description of the Proposed Development contained within the statutory notices for the application is set out below:

Demolition of existing structures on site (Including workshop and storage buildings, shot blasting shed, lube oil store, toilet block, chemical storage bund, boiler wash storage tank, canteen, demineralised water tank, water treatment plant building and associated infrastructure, 'puraflo' wastewater treatment plant, tanks and fuel lines); Construction of OCGT power plant (350MW), and associated building (30m high) including air intake; Emissions stack (55m high) with continuous emissions monitoring systems ('CEMS'); Selective Catalytic Reduction ('SCR') with air intake, filters and dilution fans; Skids; 2no. blocks of fin fan coolers; Power control module; Emergency generator; One unit transformer and one grid transformer with a firewall separating, and overhead cable connection to existing 220kV substation; Aqueous ammonia tank; Propane gas tank, compound and unloading bay; Demineralised water treatment plant; 2no. Demineralised water storage tanks; Raw water and fire water storage tank; Fire water module; 3no. fuel storage tanks with 2no. unloading bays; Fuel polishing and transfer system; Fuel pipework; Wastewater treatment plant; Administration building and workshop with associated car parking area (8no. spaces); Store; Flood defence wall and gates; And all associated ancillary development, site works and services including internal roads, security fencing and gates, drainage infrastructure, lighting, underground pipework and cabling.

3.3.3 The Proposed Development will include the following:

- OCGT power plant (350MW) and associated building including air intake;
- Emissions stack (55m high) with continuous emissions monitoring systems (CEMS);
- Selective Catalytic Reduction (SCR) with air intake, filters and dilution fans ;

- Skids;
- Fin fan coolers (OCGT);
- Fin fan coolers (Lube Oil);
- Power Control Module
- Emergency generator
- One unit transformer and one grid transformer with a firewall separating;
- Aqueous ammonia tank;
- Ignition propane gas tank and compound;
- Demineralised water treatment plant;
- 2no. Demineralised water storage tanks;
- Raw water and fire storage water tank;
- Fire water module;
- 3no. fuel storage tanks with two unloading bays;
- Fuel polishing and transfer system;
- Fuel pipework;
- Electrical connection from main transformer (unit) to 220 kV substation (75m overhead cables);
- Wastewater treatment plant;
- Administration building and workshop with associated car parking area;
- Store;
- Flood defence wall and gates; and
- Demolition works .

3.3.4 In connection with and in addition to the above, the following infrastructure will be included as part of the Proposed Development:

- Internal roads;
- External lighting, including lighting columns;
- Security fencing and gates; and
- Utilities, pipes, cables and connection to existing surface water drainage systems.

3.3.5 The works will include the demolition and removal of the following ancillary buildings/structures associated with the existing Tarbert HFO Power Station:

- Workshop
- Storage Buildings
- Shot Blasting Shed

- Lube Oil Store
- Toilet Block
- Chemical Storage Bund
- Boiler Wash Storage Tank
- Canteen
- Demineralised water tank
- Water Treatment Plant Building and associated infrastructure
- 'Puraflo' wastewater treatment plant
- Tanks
- Fuel Lines

Fuel

3.3.6 The Proposed Development will involve the combustion of HVO as the fuel in a gas turbine (operating in open cycle mode) that drives a generator to produce electricity.

3.3.7 HVO is a type of biofuel that is produced by processing waste feedstocks to create a fossil-free alternative to distillate-oil in accordance with European Union (EU) sustainability standards. Biofuels provide a transitional step away from fossil fuels and towards low-carbon hydrogen. The Proposed Development supports an orderly transition to a low-carbon world whilst also tackling Ireland's security of electricity supply challenges. The fuel itself is a waste by-product, it does not involve any food displacement and has a lower greenhouse gas emissions profile across its lifetime when compared to alternatives such as diesel combustion.

3.3.8 The Applicant is committed to sourcing HVO that is third-party Certified to Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources, i.e. Renewable Energy Directive II ('RED-II') under the International Sustainability and Carbon Certification (ISCC).

3.3.9 The HVO for the Proposed Development will be sourced from 100% waste feedstocks, the raw materials for which are grown on a seasonal basis so there is no long-term 'carbon debt'. Supplied HVO will comply with RED II (Directive (EU) 2018/2001), which provides specific sustainability criteria and the carbon intensity of individual biofuels, including an assessment of the feedstocks used and the emissions from their production, processing, and supply, and will be certified accordingly by a third party.

3.3.10 There are a number of HVO suppliers in Ireland that are certified in line with ISCC and RED II, which provide HVO for various uses. The applicant will source its HVO from one or more of these suppliers.

3.3.11 There will be three HVO fuel storage tanks as part of the Proposed Development to provide up to 84 hours of storage capacity.

OCGT Technology

3.3.12 The Open Cycle Gas Turbine (OCGT) technology being proposed facilitates fast plant start-up durations and can provide response capability in a timely fashion to respond to sudden fluctuations in electricity demand on the grid and to support security of supply. The Proposed Development will not exceed 350MW net electrical output, and this will be controlled through a plant management system.

3.3.13 The gas turbine and associated auxiliaries will utilise BAT (Best Available Technology) combustion technology to ensure that exhaust emissions to atmosphere comply with the relevant licence requirements. A Continuous Emissions Monitoring System (CEMS) will be provided on the flue gas emissions stack for monitoring in accordance with EPA requirements.

3.3.14 The plant will be available to operate 24-hours per day, seven days per week with the exception of periods of scheduled and unscheduled outage such as for maintenance activities. However, the expected operation will be non-continuous, operating only as and when required. It is expected that the plant will operate during periods of peak demand for electricity and when other sources of electricity generation are not available.

3.3.15 A description of each of the components of the Proposed Development, together with its construction27, operation28 and decommissioning phases, is set out within Chapter 5 of the EIAR.

Community Gain

3.3.16 The Applicant is committed to the provision of a community gain proposal linked to the Proposed Development. Building on pre-application engagement, the Applicant will continue to work collaboratively with the local community and stakeholders, through ongoing consultation, to understand the principles around which any community gain should be aligned .

3.3.17 The project's dedicated Community Liaison Officer will continue to engage with the local community, stakeholders and those who may be impacted by the Proposed Development to establish a transparent process. The company is committed to ensuring that any community commitment contributes to the social, environmental, and economic well-being of local communities over the construction and operational phases of the Proposed Development.

3.3.18 SSE is committed to developing a holistic relationship with the communities in which it operates and aims to work collaboratively with all stakeholders during the construction. operational and decommissioning phases of its projects.

27 The construction phase is expected to be approximately 29 months
28 It is expected that the Proposed Development will have a design life of at least 25 years

3.4 Pre-Application Consultation

3.4.1 This section summarises the consultation activity undertaken in relation to the Proposed Development prior to submission of the planning application.

3.4.2 EIAR Chapter 6 provides further detail of the pre-application consultation undertaken, including public consultation events that have taken place in the local area.

Strategic Infrastructure Development Pre-Application Consultation

3.4.3 The Applicant submitted a request to An Bord Pleanála on 12th April 2023 to enter into pre-application consultation under Section 37B of the Planning and Development Act 2000 (as amended) and attended a pre-application meeting with the Board on 28th August 2023. The principal matters discussed related to the environmental impact of the Proposed Development, including the sourcing of HVO.

3.4.4 Following the meeting the Applicant submitted written clarifications to the Board's Inspector and formal closure of the Pre-Application Consultation process was requested by the Applicant on 15th September 2023.

3.4.5 The Board issued a notice on 16th October 2023 confirming that the Proposed Development would fall within the scope of paragraphs 37A(2)(a) and (b) of the Act and would be Strategic Infrastructure within the meaning of section 37A of the Planning and Development Act, 2000, as amended. Therefore, an application for permission for the Proposed Development must be made directly to An Bord Pleanála under Section 37E of the Act (refer to Appendix 6B, EIAR Volume II, for An Bord Pleanála's response to the pre-application consultation).

Statutory Consultation and Public Notices

3.4.6 In accordance with the requirements for public notices set out under Section 214 of the Planning and Development Regulations 2001, as amended, the applicant has notified the public of this application by means of erecting site notices on the relevant lands and publishing a newspaper notice in both the Irish Independent and the Irish Examiner, which are both approved for use by Kerry County Council and are in circulation in the local area. Copies of the site notice and newspaper notices are included in the planning application.

3.4.7 In addition, an application website has been created, which is referenced in the public notices and contains a full set of the submitted application documents for ease of inspection by members of the public.

3.4.8 The application relates to a COMAH establishment and therefore falls under the requirements of the Chemicals Act (Control of Major Accident Hazards Involving Dangerous Substances) Regulations, 2015. The Health and Safety Authority (HSA) has been notified accordingly.

Prescribed Bodies

3.4.9 The Applicant has also notified the Prescribed Bodies as part of this submission which are included within the Board's notice letter (Referred to above). A Schedule of the Prescribed Bodies which have been notified can be found in Appendix E of the application form.

4.0 Policy Context

4.1 Introduction

4.1.1 This Section sets out the planning policy context at national, regional and local level as it applies to the Proposed Development.

4.1.2 Energy policy in Ireland is driven by international climate change agreements to increase renewable energy generation and transition to a more sustainable, decarbonised system while also increasing competitiveness and security of supply. An overview of the relevant EU policy context is set out in Chapter 2 of the EIAR.

4.1.3 European policy provides the context for policy and guidance documents at national, regional and local level which increasingly recognise that achieving significant increases in renewable generation will require investment in associated systems and technology, such as OCGT peaking plants, to manage intermittent power supply.

4.2 National Policy

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

4.2.1 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.

4.2.2 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.

4.2.3 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"[29].

"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"[30] *(emphasis added).*

"Due to the variability of wind conditions, wind generation poses challenges to the operation of electricity grids. In Ireland, these challenges are being addressed by the electricity system operators under their DS3 programme".[31]

[29] Department of Communications, Climate Action and Environment (DECC). (2015). The White Paper: Ireland's Transition to a Low Carbon Energy Future 2015-2030. (Para 103, Page 48)
[30] Department of Communications, Climate Action and Environment (DECC). (2015). The White Paper: Ireland's Transition to a Low Carbon Energy Future 2015-2030. (Page 54)
[31] Department of Communications, Climate Action and Environment (DECC). (2015). The White Paper: Ireland's Transition to a Low Carbon Energy Future 2015-2030. (Para 128, Page 53)

4.2.4 The DS3 programme's stated aim is *to "meet the challenges of operating the electricity system in a secure manner while achieving the 2020 renewable electricity targets"*[32]. The Proposed Development will provide quick response capabilities to Eirgrid in keeping with the DS3 Programme ('Delivering a Secure, Sustainable Electricity System') and, into the future, with its 'Shaping Our Electricity Future' Programme.

4.2.5 The Proposed Development will help to ensure that the grid network can continue to operate efficiently with the integration of variable renewable energy sources, in accordance with long-standing policy objectives.

Climate Action and Low Carbon Development (Amendment) Act 2021

4.2.6 The *Climate Action and Low Carbon Development Act 2015* (GOI, 2015) (the 2015 Act) established the national goal to move to a low carbon, climate resilient and environmentally sustainable economy. The National Mitigation Plan and the National Adaptation Framework were first established under the 2015 Act.

4.2.7 A more ambitious target has now been committed to in law through the *Climate Action and Low Carbon Development (Amendment) Act 2021* (the 2021 Act). The 2021 Act amends the 2015 Act in order to strengthen the governance framework on climate action by the State through the introduction of a legally binding interim target of 51% reduction in greenhouse gas emissions by 2030 relative to a baseline of 2018.

4.2.8 The 2021 Act establishes a target to achieve a climate neutral economy by no later than the end of the year 2050, and introduces a system of successive five-year carbon budgets, starting in 2021.

Climate Action Plan

4.2.9 The Climate Action Plan 2023 (Published December 2022) is the first to be prepared under the 2021 Act. It sets out a 'roadmap' to achieve a net zero carbon energy system by 2050. It commits Ireland to aim for up to 80% of its electricity supply to be generated from renewables by 2030, with no generation from peat and coal.

4.2.10 To achieve Ireland's targets under the Plan, a detailed sectoral roadmap setting out a range of measures and actions for each sector of the economy is included. For the electricity sector, the need for additional flexible, dispatchable generation capacity is clear. The Plan states that '*rapid delivery of flexible…generation is needed at scale and in a timeframe to replace emissions from coal and oil generation before the second budget period*' (i.e. 2026 – 2030)[33].

4.2.11 Accordingly, the key measures for the sector include the need to *"deliver and accelerate a flexible system to support renewables"* and, in particular, that *"The CRU and Eirgrid will ensure an adequate level of conventional dispatchable generation capacity"*[34].

[32] http://www.eirgridgroup.com/site-files/library/EirGrid/DS3-Programme-Brochure.pdf (Page 2)
[33] CAP23, Page 123
[34] CAP23, Page 139

National Planning Framework

4.2.12 'Project Ireland 2040 - National Planning Framework', hereafter referred to as the NPF, is a 20-year planning framework designed to guide public and private investment, to create and promote opportunities for Irish citizens, and to protect and enhance Ireland's built and natural environment.

4.2.13 The NPF notes that the population of Ireland is projected to increase by approximately 1 million people by 2040, which will result in a population of roughly 5.7million. This growth will place increased demands on both the built and natural environment as well as the social and economic fabric or the country, not least in terms of energy supply. In order to strengthen and facilitate more environmentally focused planning at the local level, the NPF states that future planning and development will need to:

"tackle Ireland's higher than average carbon-intensity per capita and enable a national transition to a competitive low carbon, climate resilient and environmentally sustainable economy by 2050, through harnessing our country's prodigious renewable energy potential."[35]

4.2.14 The NPF notes that Ireland's National Energy Policy is focused on three pillars:

- Sustainability;
- Security of Supply; and
- Competitiveness.

4.2.15 In line with these pillars, the NPF requires a secure and reliable electricity supply to be achieved, which is necessary for the realisation of almost all of its National Strategic Outcomes.

4.2.16 National Strategic Outcome 8 (Transition to Sustainable Energy) notes that, in creating Ireland's future energy landscape, new energy systems and transmission grids will be necessary to enable more distributed energy generation which connects established and emerging energy sources, i.e. renewables, to the major sources of demand. To facilitate this, the NPF acknowledges 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."[36]

4.2.17 Some other key National Policy Objectives aimed at further achieving the transition to sustainable energy include:

- **National Policy Objective 52:** *The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the requirements of all relevant*

[35] Project Ireland 2040 – National Planning Framework, DHPLG, February 2018
[36] Government of Ireland, (2018). National Planning Framework. Project Ireland 2040 (Page 147)

environmental legislation and the sustainable management of our natural capital;

- **National Policy Objective 54:** *Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emission reduction; and*
- **National Policy Objective 55:** *Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050.*

4.2.18 The Proposed Development complements the national policy objectives around the creation of a lower carbon and more distributed energy generation system.

National Development Plan

4.2.19 The National Development Plan 2018 – 2027 (NDP) was introduced alongside the NPF and sets out the investment priorities that will underpin its implementation. It provides additional context for the assessment of projects such as that proposed. The NDP emphasises the need for investment in renewable energy sources, ongoing capacity renewal, and future technology that affords Ireland the opportunity to comprehensively decarbonise our energy generation.

4.2.20 The NDP was updated in October 2021. Its focus for investment in the energy network is to:

- *'ensure that it meets the challenge of integrating world-leading levels of renewable wind and solar electricity whilst ensuring security of supply; and*
- *ensure that it is fit for purpose in the medium- to longer-term in order to meet projected demand levels.'*[37]

4.2.21 It emphasises that '*ensuring continued security of energy supply is considered a priority at national level and within the overarching EU policy framework'*[38].

4.2.22 The NDP recognises that the target of delivering up to 80% of Ireland's electricity from renewable sources by 2030 will require investment in renewable electricity generation and storage ***as well as*** conventional electricity generation capacity to support the operation of variable renewable technologies and provide security of supply.

4.2.23 Strategic Investment Priority no. 4 aims to *'deliver circa 2GW of new conventional (mainly gas-fired) electricity generation capacity to support the operation of a predominantly wind/solar electricity system and provide security of supply for when variable electricity generation (wind/solar) is not sufficient to meet demand'*[39].

[37] Department of Public Expenditure and Reform, (2021). National Development Plan 2021-2030 (Page 126)
[38] Department of Public Expenditure and Reform, (2021). National Development Plan 2021-2030 (Page 125)
[39] Department of Public Expenditure and Reform, (2021). National Development Plan 2021-2030 (Page 125)

4.2.24 The NDP clarifies that much of the 2GW of new conventional generation capacity needed will need to be delivered within the next five years to meet demand.

Policy Statement on Security of Electricity Supply (2021)

4.2.25 The Government's Policy Statement on Security of Electricity Supply (November 2021) set out a number of updates to national policy in the context of Programme for Government commitments relevant to the electricity sector, planning authorities and developers. It seeks to ensure that continued security of electricity supply is considered a priority at national level.

4.2.26 The policy statement is explicit in stating 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*.

National Energy Security Framework (2022)

4.2.27 The National Energy Security Framework, published by the Government in April 2022, provides a further policy response to the challenges of ensuring long-term and ongoing security of energy supply.

4.2.28 It sets out a 'whole of Government' response to the challenges posed to the state's energy security and energy affordability in the context of recent events, including the war in Ukraine. It recognises that the level of dispatchable electricity generation capacity needs to increase significantly over the coming years to reliably meet the expected demand for electricity.

Eirgrid/SONI – Shaping our Electricity Future – A Roadmap to Achieve Renewable Ambition

4.2.29 Eirgrid's 'Shaping our Electricity Future' document, first published in November 2021 (and updated in 2023), *"identifies the transmission network reinforcements needed to manage renewable generation and demand growth".* It provides an outline of the key developments needed to support a secure transition to at least 80% renewables on the electricity grid by 2030. Inherent to this is continuing to operate, develop and maintain a safe, secure, reliable, economical, and efficient electricity transmission system with a view to ensuring that all reasonable demands for electricity are met.

4.2.30 The document is informed by extensive stakeholder and public engagement alongside comprehensive modelling and analysis of network reinforcements. It advises that *"the development of new…clean dispatchable capacity…is critical in mitigating the risks related to potential supply shortfalls"*[40].

[40] Eirgrid/SONI (2023), Shaping our Electricity Future Roadmap version 1.1 (Page 66)

Eirgrid Group – Strategy 2020-50: Transform the Power System for Future Generations

4.2.31 Eirgrid's statement of purpose is to 'Transform the power system for future generations'. The 'Strategy 2020-50' document sets out Eirgrid's strategy for achieving this and the challenges that they are facing. "*The electricity system will carry more power than ever before and most of that power will be from renewable sources"*[41]. The necessary changes will be significant and will need to be managed in a co-ordinated and cost-effective way.

4.2.32 Strategy 2020 - 50 recognises that, in order to increase the amount of renewable power on the grid, the system must be operated in a more dynamic and responsive way: "*This will require improvements by the infrastructure to make the grid stronger and more flexible*"[42]. This will be achieved *"by using innovative solutions as well as proven technologies",* but Eirgrid will seek to ensure that the changes will not impact the reliability of the electricity system.

Eirgrid Group – Delivering a Secure and Sustainable Electricity System (DS3 Programme)

4.2.33 In response to binding national and European targets, the Eirgrid Group began a multi-year programme, 'Delivering a Secure, Sustainable Electricity System' (DS3), in 2011.

4.2.34 The aim of the DS3 Programme was to meet Ireland's 2020 electricity targets by increasing the amount of renewable energy on the Irish power system in a safe and secure manner.

4.2.35 The DS3 Programme is designed to ensure that Ireland can securely operate the power system with increasing amounts of variable non-synchronous renewable generation over the coming years.

4.2.36 The DS3 Programme remains ongoing, with new targets set for 2030, but is to be replaced by the operational roadmap set out in the 'Shaping Our Electricity Future' programme.

The Eirgrid/SONI Ireland Capacity Outlook 2022 - 2031

4.2.37 The latest all-Ireland Capacity Statement from Eirgrid/SONI emphasises that the *"the current outlook, based on the best information available, is serious. It is likely that in the coming years we will experience system alerts and will need to work proactively to mitigate the risk of more serious impacts"*[43].

4.2.38 It predicts capacity deficits during the 10 years to 2031 and states that *"further new electricity generation will be required to secure the transition to high levels of renewable electricity over the coming decades"*.

[41] Eirgrid Group -Strategy 2020-50: Transform the Power System for Future Generations (Page 4)
[42] Eirgrid Group -Strategy 2020-50: Transform the Power System for Future Generations (Page 10)
[43] Eirgrid/SONI (2022), Ireland Capacity Outlook 2022 – 2031 (Page 4)

4.2.39 It is clear that this must include new clean dispatchable generation capacity such as gas or HVO-fuelled turbines: *"A balanced portfolio of new capacity is required and this includes the need for new cleaner…generation plant"*[44].

4.2.40 It also recognises that this balanced portfolio of new capacity is essential in order for Ireland to achieve its carbon budgets for the electricity sector up to 2030: *"This balanced portfolio is also crucial to ensuring Ireland meets its carbon budgets between now and 2030 for the electricity sector, which positions the electricity sector to achieve the zero net carbon target by 2050"*[45].

National Hydrogen Strategy

4.2.41 The National Hydrogen Strategy was published in July 2023 and sets out a strategic vision for the role that hydrogen will play in Ireland's energy system in the future, looking to its long-term role as a key component of a zero-carbon economy, and short-term actions that need to be delivered over the coming years to enable the development of the Sector.

4.2.42 The three key policy drivers of the Strategy are as follows:

- Decarbonising our economy: providing a solution for hard to decarbonise sectors where electrification is not feasible, or cost-effective;
- Enhancing our energy security, through the development of an indigenous zero carbon renewable fuel which can act as an alternative to the 77% of our energy system which today relies on fossil fuel imports; and
- Developing industrial opportunities, through the potential development of export markets for renewable hydrogen and other areas such as Sustainable Aviation Fuels.

4.2.43 It identifies flexible power generation as one of the first sectors that will develop as a significant end-user of renewable hydrogen but recognises that the transition to hydrogen will take time and it will not be until mid to late 2030s that a national hydrogen network emerges

'Tomorrow's Energy Scenarios' - 2023 Consultation Report

4.2.44 The 'Tomorrow's Energy Scenarios' 2023 Consultation Report was published by Eirgrid and SONI in November 2023. It sets out long term energy scenarios for Ireland and considers how electricity demand and generation may evolve from 2035 to 2050.

The four distinct scenarios that are being consulted upon are:

- 'Self-Sustaining': Follows a fast-paced transition away from fossil fuels to electrification of all sectors, culminating in a new power system from 2040.
- 'Offshore Opportunity': Follows a fast-paced transition to a decarbonised power system through faster and larger development of offshore wind and results in the

[44] Eirgrid/SONI (2022), Ireland Capacity Outlook 2022 – 2031 (Page 5)
[45] Eirgrid/SONI (2022), Ireland Capacity Outlook 2022 – 2031 (Page 5)

power system becoming a significant net electricity exporter. This scenario also leads to a net zero power system by 2040.

- 'Gas Evolution': Follows a steadier pace, reaching a net zero power system by 2045 through the creation of significant renewable generation capacity to produce both electricity and power electrolysis plant to produce green hydrogen.
- 'Constrained Growth': This is the slowest of the four scenarios with a net zero power system being achieved by 2050. This involves slower development of decarbonised generation capacity and greater reliance on electricity imports when domestic supply is unable to meet demand.

4.2.45 The key conclusions arising out of the scenario testing include that electricity demand on the island of Ireland will more than double by 2050 and that, in all scenarios, a balanced portfolio of electricity generation will be required, with renewable generation supported by firm dispatchable capacity, with the acceleration of green fuels being required to offer reliability and flexibility to the power system.

Energy Security in Ireland to 2030 – Energy Security Package

4.2.46 The 'Energy Security in Ireland to 2030 – Energy Security Package' was published by the Department of the Environment, Climate and Communications in November 2023. The Energy Security Package sets out a range of measures to be implemented up to 2030 and subsequently reviewed every five years thereafter, reporting to a new Energy Security Group with responsibility for oversight.

4.2.47 The Energy Security Package sets out actions for the short- and medium-term prioritising:

- Reduced and Responsive Demand.
- Renewables Led System.
- More Resilient Systems.
- Robust Risk Governance.

4.2.48 Among the key Actions within the Package to create a more resilient energy system are Actions 8 and 12. Action 8, 'To complete implementation of the Commission for Regulation of Utilities (CRU) Security of Electricity Supply Programme', re-iterates the need for the *"procurement of at least 2GW of new, flexible, enduring, capacity through market mechanisms*", while Action 12, 'To accelerate delivery of power system flexibility', notes that *"embedding flexibility in the power system can change how Ireland utilises conventional capacity and contribute to a secure transition".*

The Proposed Development complies with National Policy objectives and long-term sectoral strategy. It will contribute to greenhouse gas reduction targets, facilitate the integration of more renewable generation into the electricity network, and help to maintain security of supply while supporting Ireland in its transition to a low carbon economy.

4.3 Regional Planning Policy

Southern Regional Assembly: Regional Spatial and Economic Strategy 2020-2032

4.3.1 The Regional Spatial and Economic Strategy (RSES) for the Southern region was adopted in 2020 and provides a high-level development framework for the region that supports the implementation of the NPF. It identifies 11 principles to build a strong, resilient, sustainable region. With regard to climate change, the Strategy notes that a key priority is *"safeguarding and enhancing our environment through sustainable development, prioritising action on climate change across the Region, driving the transition to a low carbon and climate resilient society"*.[46]

4.3.2 The following 'Regional Policy Objectives' aim to ensure that the development of the electricity network is undertaken in a safe and secure way which meets projected demand levels, Government Policy and the need to achieve a long-term, sustainable and competitive energy future for Ireland:

- **RPO 87** – *The RSES is committed to the implementation of the Government's policy under Ireland's Transition to a Low Carbon Energy Future 2015-30 and Climate Action Plan 2019. It is an objective to promote change across business, public and residential sectors to achieve reduced GHG emissions in accordance with current and future national targets, improve energy efficiency and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture.*
- **RPO 97** - *It is an objective to support the sustainable technology upgrading and conversion of power stations in the Region to increase capacity for use of energy efficient and renewable energy sources.*

RPO 109 - *Proposals for Bio-energy development and infrastructure will need to be subject to robust site and/or route selection that includes consideration of likely significant effects on European Sites and subject to the outcome of the required appraisal, planning and environmental assessment processes*. **RPO 219 -** *It is an objective to support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers (subject to appropriate environmental assessment and the planning process) to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs.*

The Proposed Development complies with Regional Policy objectives. It will greatly increase the capacity for the use of sustainable fuel in the generation of electricity and contribute to the sustainable upgrading of the historic Tarbert power station site. In doing so it will help to provide security of energy supply and the integration of more renewable generation into the electricity network while supporting Ireland in its transition to a low carbon economy.

[46] Southern Regional Assembly (2020). Regional Spatial & Economic Strategy for the Southern Region

4.4 Local Planning Policy

4.4.1 This section describes the local development plan policies of relevance to the Proposed Development.

4.4.2 The local development plan policy context is contained within the Kerry County Council Development Plan 2022-2028.

Kerry County Council Development Plan 2022-2028

4.4.3 The Kerry CDP notes that the availability of energy is of critical importance to the continued development and expansion of employment in the county and that it is vital that there is sufficient capacity to meet the current and future needs.

4.4.4 Chapter 12 (Energy) of the CDP outlines that '*Kerry is well placed to encourage and facilitate the sustainable development of power generation facilities in the county'* and *'will continue to support the infrastructural renewal and sustainable development of electricity and gas networks*'[47].

4.4.5 The CDP states that it is the policy objective of KCC to *'ensure that the energy needs of future population and economic expansion within designated growth areas and across the county can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs.*

4.4.6 Policy Objectives have been provided within the CDP to support this priority objective:

- **Policy 12-1 – Energy** *'Support and facilitate the sustainable provision of a reliable energy supply in the County, with emphasis on increasing energy supplies derived from renewable resources whilst seeking to protect and maintain biodiversity, archaeological and built heritage, the landscape and residential amenity and integration of spatial planning and energy planning in the county'[48].*
- **Policy 12-7 – Transmission Grid** '*Support and facilitate the sustainable development of enhanced electricity and gas supplies, additional electricity generation capacity, and associated networks, to serve the existing and future needs of the County*[49].
- **Policy 12-16 – Renewable Energy** '*Facilitate and promote sustainable alternative forms of renewable energy including hydro, bio, solar, geothermal and off-shore wind energy*[50]'. *To support and liaise with statutory and other energy providers in relation to power generation, in order to ensure adequate power capacity for the existing and future needs of the County.*
- **Policy 12-31 – Bioenergy** '*Facilitate the sustainable development of bioenergy plants including anaerobic digestors, in compliance with the development management standards on appropriately zoned lands. Bioenergy installations shall not be permitted in areas where such developments may affect residential or visual amenity. They should be developed close to the point of demand and be served by public roads*

[47] Kerry County Council (2022), Kerry County Development Plan 2022-2028, page 254.
[48] Kerry County Council (2022), Kerry County Development Plan 2022-2028, page 254
[49] Kerry County Council (2022), Kerry County Development Plan 2022-2028, page 256
[50] Kerry County Council (2022), Kerry County Development Plan 2022-2028, page 257

with sufficient capacity to absorb increased traffic flows and adjacent to transport corridors[51]'.

4.4.7 Chapter 2 (Climate Change & Achieving A Sustainable Future) of the CDP outlines KCC's ambitions to *'provide for the sustainable development of County Kerry in a way which supports people and employment while transitioning to a low carbon society… which safeguards and enhances the environment'*[52]. It includes the following policy objective for the county's sustainable future:

- ***Policy 2-2 – Climate Change and Achieving a Sustainable Future – '****Facilitate and support national climate change objectives contained in the Climate Action Plan 2021 and the actions contained in the KCC Climate Change Adaptation Strategy 2019-2024 and successor strategies, and to consider a variation of this development plan, if necessary, to align with the approach recommended in the guidelines: Development Plans, Guidelines for Planning Authorities'*[53].

4.4.8 Chapter 9 (Economic Development) of the CDP outlines KCC's objectives to support the economic development of the County and sets out the '*spatial planning framework which will deliver the required development patterns and maximise the conditions for sustainable economic development in Kerry'*[54].

4.4.9 The Plan notes that '*The Strategic Development Location (SDL) at Tarbert/Ballylongford in North Kerry is recognised for its potential as an Energy Hub and for industrial development at a regional and national level'*[55].

4.4.10 It sets out the following policy objective to support the Strategic Development Location.

- **Policy 9-26 Shannon Estuary** '*Safeguard the role and function of the Power Plant Hub at Tarbert, including the NORA Strategic Oil Reserves Plant, as a key driver of economic growth in the Region, encouraging its sustainable growth and diversification, in accordance with Regional and National Energy Objectives'*.

Kerry County Council Draft Local Authority Climate Action Plan 2024 – 2029

4.4.11 Although not yet in force, this Draft Action Plan sets out how the Local Authority will address the internal actions that are necessary to meet its own ambitious targets and the external actions that the Council will take to influence, facilitate and advocate for climate action. Within the context of the Plan, climate action is seen as two integrated responses that society has to take to meet the challenges of climate change. These are mitigation, which seeks to prevent the impacts of climate change and adaptation, which seeks to respond to the impacts of climate change.

[51] Kerry County Council (2022), Kerry County Development Plan 2022-2028, page 271
[52] Kerry County Council (2022), Kerry County Development Plan 2022-2028, page 34
[53] Kerry County Council (2022), Kerry County Development Plan 2022-2028, page 40
[54] Kerry County Council (2022), Kerry County Development Plan 2022-2028, page 164
[55] Kerry County Council (2022), Kerry County Development Plan 2022-2028, page 178

4.4.12 With regard to the built environment and the local authority's activities in development management, the Draft Action Plan advances the following 'Strategic Goal' and corresponding objective:

- **1. Built Environment and Transport** – *'The built environment and infrastructure are climate-proofed to ensure emissions and energy efficiency targets are met towards reaching a decarbonised society'.*
    - **Objective 1.6** – *'Ensure the Planning Authority integrates climate action into Land Use Planning and Development Management'.*

The Proposed Development is clearly in accordance with Local Policy, notably the objectives to support and facilitate the sustainable provision of a reliable energy supply in the county and to safeguard the role and function of the power plant hub at Tarbert in accordance with Regional and National energy objectives.

It is consistent with European, National, Regional and Local policy and will contribute to meeting the urgent requirement for new flexible and clean dispatchable generation capacity.

The Proposed Development will facilitate the integration of more renewable generation into the electricity network, helping to maintain security of supply while supporting the transition to a low carbon economy in Ireland.

5.0 Environmental Impact

5.1 Need for EIAR

5.1.1 An EIAR is provided with 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 ABP with the environmental information that must be taken into account when determining the Application.

5.1.2 The following topic areas are covered in the EIAR:

- Air Quality
- Cultural Heritage
- Biodiversity
- Landscape and Visual Effects
- Noise and Vibration
- Water Environment
- Land and Soils
- Traffic and Transport
- Population and Human Health
- Material Assets
- Climate
- Waste Management
- Major Accidents and Disasters

5.1.3 A brief summary of the assessment for each topic area is provided in the sections 5.2 – 5.14 below, with the interaction of effects addressed in section 5.15. The overall conclusion of the EIAR is presented in section 5.16. Please refer to the submitted EIAR for full detail.

5.1.4 The Proposed Development has also been subject to Appropriate Assessment, with a Natura Impact Statement being prepared to assess the impact of the Proposed Development on Natura 2000 sites within its Zone of Influence. A summary of the Appropriate Assessment process is provided at section 5.17.

5.2 Air Quality

5.2.1 A robust assessment of the likely air quality and emissions impacts of the Proposed Development has been undertaken in the EIAR and the findings are presented in EIAR Chapter 7. The air quality impacts from the operational traffic of the Proposed Development are not considered in Chapter 7 because road traffic during operation is expected to be minimal. The headline findings are summarised below:

- During construction and decommissioning there is a negligible to low risk of potential dust impacts occurring taking account of the scale of the works, the limited number of sensitive receptors in close proximity to the works and the mitigation measures included in the design of the Proposed Development.
- No specific mitigation has been identified as necessary for the construction and decommissioning phases, however certain measures will be implemented as part of best practice. No significant effects have been identified.
- For human health receptors during the operational phase there will not be a significant effect on local air quality.
- The assessment has identified several incidences of moderate impacts at human receptors in both the 'Proposed Development Scenario' and the 'Cumulative Developments Scenario'[56]. This does not indicate a significant residual effect however, owing to the good overall air quality in the vicinity of the site.
- The residual effects at ecological sites in both the 'Proposed Development Scenario' and the 'Cumulative Developments Scenario' are predicted to be 'Not Significant' .

5.3 Cultural Heritage

5.3.1 A robust assessment of the likely cultural heritage and archaeology impacts has been undertaken in the EIAR and the findings are presented in the EIAR Chapter 8. The headline findings are summarised below:

- The assessment has determined that, as the Proposed Development is located within an established industrial setting, any archaeological remains which may have been present will have been disturbed and / or destroyed during historic works associated with the construction of the Tarbert HFO Power Station. No archaeological mitigation is required.
- One previously unrecorded heritage asset is noted within the boundaries of the Proposed Development. This is a Light Keeper's House which dates to the 19th century and is associated with Tarbert Lighthouse (RPS-KY-0891). While not officially recorded as a heritage asset, this building has been judged through professional opinion to be of medium importance and regional interest. This asset will not be physically impacted, although its setting will be impacted by the presence of the Proposed Development.
- Procedures will be adopted during the construction phase to reduce the impact of noise, dust and vibration during construction, along with

[56] i.e. The proposed OCGT in combination with the 'TEG' project and Moneypoint power station

appropriate measures to avoid or reduce adverse visual impacts. No further mitigation will be required at the operational phase.

5.4 Biodiversity

5.4.1 A robust assessment of the likely biodiversity impacts has been undertaken in the EIAR and the findings are presented in the EIAR Chapter 9. The headline findings are summarised below:

- As part of the Appropriate Assessment (AA) for the Proposed Development, the River Shannon and River Fergus Estuaries SPA and Lower Shannon River SAC were determined to be within the Zone of Influence (ZoI) of the Proposed Development.

- Any potential for likely significant effects on the qualifying features of these sites was investigated within the Appropriate Assessment Screening.

- It was determined that the possibility of likely significant effects from the following impacts could not readily be discounted without further detailed appraisal, and they were therefore the subject of a Natura Impact Statement (NIS):

    - *Construction of the Proposed Development, specifically with regard to the potential for impacts associated with noise and visual disturbance to SCI bird species of the SPA and aquatic Annex II species of the SAC.*

- Owing primarily to the results of the noise modelling assessment, limited numbers and distribution of special conservation interest (SCI) bird species in the zone of influence of the Proposed Development, and the location in which the OCGT infrastructure of the Proposed Development will be constructed, disturbance during construction, operational and decommissioning stage was concluded to be insignificant in terms of disturbance to bird SCI of the SPA.

- In terms of visual disturbance, it was found that in areas where wintering bird activity was recorded the habitat is screened from the Proposed Development by existing topography, vegetation and buildings, including the large existing Tarbert HFO Power Station building. Furthermore, vehicles accessing the Site will do so along an existing public road, to which birds can be expected to be habituated. It is therefore considered unlikely that any visual disturbance of birds using the habitats will occur. During the operational phase, the presence of personnel and vehicles will be much reduced when compared to construction / decommissioning.

- With regard to disturbance by illumination, the Site is already illuminated throughout the night, particularly around the existing Tarbert HFO Power Station building. The closest areas of coastline to the main development area, to the north and north-east of the Site, have the lowest screening from the

construction works area, but also recorded very few SCI birds. Therefore, any illumination of these areas is unlikely to adversely impact foraging or roosting birds, given that these areas are not well used by birds and there is abundant alternative habitat in the vicinity which will not be impacted by illumination.

- As such, it was concluded that there will be no significant effect from visual disturbance of SCI birds during the construction and operation phase of the Proposed Development.

- Construction phase noise, vibration and visual disturbance impact on Annex II QI species of the SAC was also assessed.

- Disturbance of QI fish species as a result of the transfer of noise from air into water is not considered to be likely. The primary concern is therefore ground-borne noise / vibration.

- It is assumed that some level of disturbance may be caused by piling activity, however this is considered likely to be low as the transfer of sound / vibration to the estuary will be reduced at distances of even up to 20m, and negligible at 50m (BS5228-1:2009+A1:2014 *'Code of practice for noise and vibration control on construction and open sites'* (BS5228)), and noise / vibration levels are consequently not expected to be substantial within the Shannon Estuary.

- Dolphins and otters, which are both predatory animals and may therefore receive some benefit from increased illumination, are not considered to be particularly sensitive to artificial illumination of watercourses or (in the case of otter) riparian habitat.

- A range of general mitigation measures will be implemented, as detailed within the EIAR and NIS.

- Provided these are implemented, it was concluded that there will be no adverse effect on the integrity of any European site, either alone or in-combination with other plans or projects.

- In view of best scientific knowledge and on the basis of objective information, it is considered that the Proposed Development will have no adverse or significant effects on Site integrity of any European site, either alone or in-combination with other plans or projects during the construction or operational phases of the Proposed Development.

5.5 Landscape and Visual Effects

5.5.1 A robust assessment of the likely landscape and visual impacts has been undertaken in the EIAR and the findings are presented in the EIAR Chapter 10. The headline findings are summarised below:

- Construction effects on landscape character will be temporary, short term and reversible.

- Construction activity will affect views at a local level, however it will not alter the landscape character considering the existing industrial nature of the setting. Outside of the Site, indirect effects of construction works will not result in the permanent loss of key features such as the overall landscape structure.

- During the operational phase, the Proposed Development will slightly intensify the existing industrial character of the Site, but will not alter the landscape character locally or in the wider study area due to its scale, nature and location.

- Similarly, Outside of the site boundary the seascape character will not alter due to the nature, scale and location of the Proposed Development. The Proposed Development is only a small component in the overall size of the seascape character area and type.

- Visual mitigation the Proposed Development is inherent in the design of its architecture and its colour scheme, with the primary objective to minimise the visual impact of the built structures and to allow the buildings to be as unobtrusive as possible against their backdrop. The proposed colour scheme was drawn from colours found in the surrounding local landscape - the range is all within a muted light grey and green spectrum.

- A range of mitigation measures will also be implemented as part of good lighting design practice.

5.6 Noise and Vibration

5.6.1 A robust assessment of the likely noise and vibration impacts has been undertaken in the EIAR and the findings are presented in the EIAR Chapter 11. The headline findings are summarised below:

- During construction (and decommissioning), noise levels will likely be highest during the initial enabling period whilst louder activities such as earthworks and piling take place. As the construction phase develops, noise levels are expected to reduce as less noisy works (plant installation, internal works within structures) take over.
- Predicted construction noise levels were shown to be comparable to the existing ambient sound levels and to meet the nominated assessment criteria under a number of worst-case assumptions in calculation of noise level method and the selected assessment criteria.
- With regard to construction stage noise levels generated by on-site activity, no significant adverse effects are expected at residential noise sensitive receptor

(NSR) positions with the exception of noise sensitive receptor one (NSR1 and NSR2) during the peak month of activity. This effect can be mitigated, and the impacts are classified as not significant and short-term.

- Construction traffic will have a *negligible impact (not significant)* on existing road traffic noise levels during the construction phase.
- During the operational phase, sound will be emitted principally from the top of the 55m tall chimney stack, the air inlets and the transformers. Emissions during the operational phase will be subject to fixed permitted limits, which are more stringent during the night-time.
- For operational plant, considering numerical assessment, adoption of mitigation, cumulative and contextual factors, significant impacts associated with noise levels are not expected at NSR 2 and NSR 3. At NSR1 the night-time criterion is exceeded by 10dB, which may be considered significant depending on the context.
- There will be minimal traffic associated with the Proposed Development operations and therefore no notable increase in operational traffic will be expected.
- No significant cumulative impacts are expected to arise from the Proposed Development, either during construction/ decommissioning or operational phases.
- Construction stage mitigation will be implemented, including careful programming of site works and adoption of good practice measures.
- Operational phase noise impact will be mitigated via the inclusion of mitigation measures such as attenuators, silencers, careful plant item selection and enclosures.
- The development will comply with the relevant operational phase noise limits. This will be confirmed via an appropriate noise monitoring regime as part of the plant licencing.
- Post mitigation, no significant residual impacts are expected.

5.7 Water Environment

5.7.1 A robust assessment of the likely impacts on the water environment has been undertaken in the EIAR and the findings are presented in the EIAR Chapter 12. The headline findings are summarised below:

- Potential impacts identified from the construction and decommissioning phase included sedimentation of surface water features from construction works; pollution of surface waters from accidental spills and leaks of fuels and chemicals; and alteration of pH in surface water features associated with the use of concrete and lime.

- The potential operational phase impacts identified included the potential increase in volume and rate of surface water run-off from new impervious areas and process water and water treatment plant discharges.

- None of the identified potential impacts were found to be significant.

- Considering the submitted Construction Environmental Management Plan (CEMP), which includes flood defence infrastructure monitoring and maintenance, surface water flooding as well as accidental spillages and leaks are considered unlikely to occur and should they occur are likely to be temporary.

- The Proposed Development will not result in the deterioration of any water body's status under the Water Framework Directive (WFD), nor will it jeopardise the achievement of any water body achieving good ecological status under the WFD.

- A site-specific Flood Risk Assessment has been undertaken which identified a high risk of coastal flooding. A flood defence scheme is included as part of the proposed development accordingly.

- A number of mitigation measures that are standard good practice for development of this type, and which are required to comply with environmental protection legislation, will also be implemented, under the following categories:

    - Sedimentation of surface water features.
    - Fuel and chemical handling.
    - Control of concrete and lime; and
    - Surface water/flood risk

- Taking account of mitigation measures proposed the potential impact is considered to be a negligible impact to a medium sensitivity environment and the significance of the effects has been assessed as imperceptible. Cumulative impacts were not considered to be significant.

5.8 Land and Soils

5.8.1 A robust assessment of the likely soils and geology impacts has been undertaken in the EIAR and the findings are presented in the EIAR Chapter 13. The headline findings are summarised below:

- Potential impacts identified from the construction phase included impacts to soil and groundwater quality from accidental spills and leaks, use of concrete and lime, and excavation and infilling, and the use of natural resources.
- The potential operational phase impacts identified included accidental spills and leaks from fuel storage impacting soils and groundwater.

- None of the identified potential impacts were found to be significant.
- Mitigation measures associated with both the construction and operational phases of the Proposed Development have been embedded within the design.
- A number of mitigation measures designed to avoid, reduce, or offset any potential adverse geological impacts identified will be implemented under the following categories:
    - Fuel and chemical handling, transport and storage.
    - Control of soil excavation and fill placement work.
    - Sources of fill and aggregates; and
    - Control of concrete and lime.
- The submitted CEMP also includes a number of mitigation measures relating to land and soils.
- Taking account of mitigation measures proposed the potential impact is considered to be a negligible impact to a medium sensitivity environment and the significance of the effects has been assessed as imperceptible. Cumulative impacts were not considered to be significant.

5.9 Traffic and Transport

5.9.1 A robust assessment of the likely traffic impacts has been undertaken in the EIAR and the findings are presented in the EIAR Chapter 14. This chapter assesses the transportation impacts of the construction, operational and decommissioning phases of the Proposed Development. The headline findings of the assessment are summarised below:

- Capacity assessments were undertaken on critical highway links in the vicinity of the Site at future years, including traffic growth on the adjacent road network and development traffic. The results indicate that these links can operate within capacity and can accommodate the traffic associated with the Proposed Development.

- The anticipated level of construction traffic has been based on the expected construction methodology provided by SSE. Traffic volumes associated with the Proposed Development are relatively low in numbers and relate primarily to the delivery of construction equipment, materials, and construction operations.

- The Construction Traffic Management Plan (CTMP) for the Proposed Development has indicated that all construction traffic (heavy haul, general delivery, and site operatives) will arrive via the N69 and N67 and other National/ Regional Roads.

- Minimal operational traffic will be generated.

- The Proposed Development is predicted to have a *negligible* impact on the surrounding road network (this is also representative of predicted decommissioning effects).

  The implementation of the CTMP by the Contractor will minimise the potential for traffic and transport impacts during construction phase activities and the residual impact will be *not significant* and *temporary*.

5.10 Population and Human Health

5.10.1 A robust assessment of the likely population and human health impacts has been undertaken in the EIAR and the findings are presented in the EIAR Chapter 15. The headline findings are summarised below:

- The construction phase of the Proposed Development will have a slight positive effect on the local employment workforce due to the number of construction workers required.

- No impacts were identified on land use during the construction phase.

- The Proposed Development will also lead to the following impacts on human health during the construction and decommissioning

  - A neutral human health impact on access to open space and nature due to no significant effects being expected with regard to noise, air quality, or traffic.

  - A neutral human health impact on access to healthcare services and other social infrastructure due to no significant effects being expected with regard to traffic and transport.

  - A neutral human health impact on air quality, noise, and neighbourhood amenity due to no significant effects being expected with regard to noise or air quality.

  - A negative human health impact from a climate change perspective (Construction of the Proposed Development will produce greenhouse gas emissions).

- The operational phase of the Proposed Development will not lead to any impacts with regard to land use, employment, or severance, mostly because the Proposed Development is planned on a pre-existing Power Station site.

- The Proposed Development will lead to the following impacts on human health during the operational phase:

- A neutral human health impact on access to open space and nature due to no significant effects expected in regard to noise, air quality, or traffic.

- A neutral human health impact on access to healthcare services and other social infrastructure due to no significant effects expected in regard to traffic and transport.

- A neutral human health impact on air quality, noise, and neighbourhood amenity due to no significant effects expected in regard to noise or air quality.

- A negative human health impact from a climate change perspective (Operation of the Proposed Development will produce greenhouse gas emissions, however it will also support security of supply and the transition to a more renewables-based energy grid).

- The CEMP will ensure that there are no impacts on any vector that will pose a risk to human health

- No additional mitigation measures related to Population and Human Health are proposed during the operation of the Proposed Development, however mitigation for air quality, noise and vibration, traffic and transport and climate are set out elsewhere within the EIAR.

- No significant residual effects have been identified.

5.11 Material Assets

5.11.1 A robust assessment of the likely impacts on material assets (built services) has been undertaken in the EIAR and the findings are presented in the EIAR Chapter 16. The headline findings are summarised below:

- There are no potential impacts associated with change of land use
- During the construction phase there is the potential for a limited short outage to a number of utility networks such as water and electricity, to allow for the new connections associated with the Proposed Development. These outages will be temporary, and the magnitude of impact will be minor.
- During the construction phase a temporary water supply for construction works will be provided through an existing Irish Water mains connection on-site. There is the potential for a limited short outage of a water supply to allow for this connection, however this will be temporary and the magnitude of impact will be minor.
- During the construction phase foul water will be collected and periodically removed from the Site by road tanker, to a licensed water treatment plant. As this

control measure will be incorporated into the Site set-up, additional mitigation measures are not required.

- During the construction phase, a number of construction activities have the potential to release sediment and cause unacceptable sediment levels in the catchment area. Run-off containing large amounts of suspended solids could potentially adversely impact on surface water. The impact is considered to be negative, should it occur, but will be temporary in duration.
- During the operational phase, water will be supplied to the Site via the existing Irish Water mains connection into the reservoir on the SSE Tarbert site.
- During the operational phase, process wastewater (from the production of demineralised water) will be discharged to the surface water drainage system. This discharge will be regulated and monitored under the Industrial Emissions Licence.
- During the operational phase, a foul water holding tank will be provided at the administration /workshop and stores building. This will flow northwards into the proposed new wastewater treatment plant. This will discharge into the existing outfall '8/9' to the north of the Site.
- During the operational phase, surface water run-off will be generated from all hard surfaces which are exposed to rainwater or to which water is applied during wash down. This will include all roads, roofs, and other impermeable surfaces. However, surface water is collected by means of the underground drainage network and will pass through an oil interceptor prior to being released under the terms of the Industrial Emissions Licence.
- Although no significant effects are predicted, a number of best practice measures will be implemented by the Contractor during construction.
- During the operational phase, routine maintenance will be carried out in accordance with the maintenance procedures provided by the contractor and manufacturer. There will be no requirement for additional mitigation measures during the operational phase.
- All material assets will have a Neutral or Not Significant residual effect once mitigation measures including those within the CEMP are taken into account.

5.12 Climate

5.12.1 A robust assessment of the likely impact on climate as a result of greenhouse gas emissions that may arise during the construction/decommissioning and operational phases of the Proposed Development has been undertaken in the EIAR and the findings are presented in the EIAR Chapter 17. The headline findings are summarised below:

- Total Greenhouse Gas emissions from constructing the Proposed Development are estimated to be 10,399 tCO2e. The GHGs from operating the Proposed Development over its 25-year life are estimated to be 1,533,021 tCO2e. Annual

emissions are expected to be approximately 61,321 tCO2e. with the assumed operational hours of 1800 hours/year.

- The Proposed Development will play a key role in the decarbonisation of the energy sector to assist Ireland to achieve net zero emissions by 2050.
- When viewed in the broader context of Irish energy and Greenhouse Gas policy, the impact of the Proposed Development can be said to be '*Minor Adverse'* and therefore '*Not Significant*'.
- Climate change risk does not present a significant risk to the Proposed Development, assuming all proposed adaptation measures are successfully implemented.

5.13 Waste Management

5.13.1 A detailed appraisal of the effects of the Proposed Development on waste management was undertaken in the EIAR and the findings are presented in the EIAR Chapter 18. The headline findings are summarised below:

- Total estimated waste arising from the construction of the Proposed Development will account for <5% of national waste arisings (for the relevant categories of waste). This is assessed to result in a *slight (not significant)* effect and sufficient management capacity is expected to be available.

- A total waste recovery rate of 78% in line with the national performance is likely to be achievable for non-hazardous construction and demolition waste (C&D) (excluding naturally occurring soil and stones (Waste Code 17 05 04)) managed off-site. The majority of the good and best practice recovery rates for the main construction materials provided in the Waste and Resources Action Programme are in excess of 90%.

- The Proposed Development is therefore likely to achieve 60-89% or 90-99% overall material recovery / recycling (by weight) of non-hazardous C&D waste excluding naturally occurring material. This is assessed to result in a *slight (not significant)* effect.

- Operational waste impacts from the Proposed Development are expected to be *negligible* and will be limited to occasional disposal, maintenance, and repair.

- Where decommissioning takes place, all above-ground components associated with the Proposed Development will be disassembled and removed from the Site. The waste types generated from this are likely to be similar or of a lesser magnitude than the construction effects. Prior to removal of plant, all residues and operating chemicals will be cleaned out for the plant and disposed of at a suitably licenced facility.

- The Resource and Waste Management Plan (RWMP) and Construction Environmental Management Plan (CEMP) include design and construction measures that apply the waste hierarchy principles and minimise effects on waste. These measures will be implemented in full to achieve the recovery rates noted.

5.14 Major Accidents and Disasters

5.14.1 A robust assessment of major accidents and disasters risk has been undertaken in the EIAR and the findings are presented in the EIAR Chapter 20. The headline findings are summarised below:

- A total of five (5) reasonably foreseeable, major accident and / or disaster scenarios (Risk Events) have been identified for the Proposed Development. These include events associated with an accidental release of HVO or distillate (stored on the SSE Tarbert site in relation to the TEG project) which could be caused by incidents such as impact damage or mechanical failure. A release of HVO could result in a fire and / or explosion and a significant release of oil which reached a sensitive site such as Shannon Estuary, could result in harm to the environment. Expanding the process equipment on site and increasing the quantity of fuel stored, could increase the severity of an incident such as a fire at the Site.
- The nature of these substances, which are classified as flammable, means that the hazards associated with their use cannot be entirely eliminated. The risks of storing and using these materials will therefore be reduced to a level which the Regulatory Authorities consider is 'as low as reasonably practicable' (ALARP).
- The identified Risk Events have been assessed using specialist modelling software to support a notification required to be submitted to the Regulatory Authorities on the Proposed Development. This assessment demonstrates that the residual risk, both on and offsite, is acceptable (i.e. 'ALARP').

5.15 Interactions

5.15.1 Chapter 20 of the EIAR evaluates the potential interaction of effects described within the EIAR. All potential effects arising from interactions were identified early in the design process and in preparation of the EIAR and were therefore addressed through specific mitigation and monitoring measures detailed within the EIAR.

5.15.2 No additional mitigation or monitoring measures are required as a result of the interaction of effects.

5.16 Conclusion

5.15.1 The Proposed Development has been subject to a comprehensive EIA which has assessed all potential impacts. The EIAR concludes that the Proposed Development will have no significant residual effects. In this regard, it notes that:

- Embedded mitigation measures have been incorporated into the design of the Proposed Development throughout the design process.
- A number of impact avoidance, design and mitigation measures have been identified to mitigate and control environmental effects during the construction, operational and decommissioning stages of the Proposed Development.
- The embedded controls and all mitigation and monitoring measures are included in the Construction Environmental and Management Plan (CEMP) that has been submitted with the application

5.17 Appropriate Assessment

5.17.1 A Screening for Appropriate Assessment has been prepared on behalf of the Applicant to inform the competent authority when determining whether the Proposed Development will have likely significant effects on any European sites, considering the Proposed Development alone and in-combination other plans and projects (refer to Appendix 9B, EIAR Volume II).

5.17.2 The need for an Appropriate Assessment can only be excluded if, on the basis of objective scientific information and in light of the conservation objectives of relevant sites, the Proposed Development, either individually or in-combination with other plans or projects, will not have likely significant effects on any European site.

5.17.3 The submitted Screening Report finds that two sites have been screened out as no significant effects are likely (Appendix 9B, Table 4.4). Five European sites where sufficient uncertainty remains after Screening are identified (Refer to Table 4.4 of Appendix 9B).

5.17.4 In the absence of mitigation measures, impacts that cannot be excluded comprise those associated with noise and visual disturbance which may arise as a result of the construction of the Proposed Development, causing behavioural changes such as displacement or may impact breeding success or even cause injury to species, resulting in the inability of a European site to meet its conservation objectives.

5.17.5 Accordingly, the submitted Screening Report concludes, in view of best scientific knowledge and on the basis of objective information, that a Stage 2 Appropriate Assessment is required for European sites where uncertainty remains, to assess if the Proposed Development will impact the integrity of any European sites in light of each site's conservation objectives.

5.17.6 The Stage 2 Assessment [Natura Impact Statement (NIS)] concluded that noise and visual disturbance to SCI[57] bird species of the River Shannon and River Fergus Estuaries SPA[58] and QI[59] Annex II species of the Lower River Shannon SAC[60], Blasket Islands SAC, Kilkieran Bay and Islands SAC, and Slyne Head SAC were identified as potential impacts causing likely significant effects on these European sites. However, following assessment of the Proposed Development, alone or in combination with any other plan or project, considering the impact pathways between construction works and QI / SCI, no significant effects are considered likely, and thus no specific mitigation measures to protect European sites are considered necessary. General mitigation measures employed as industry standard best practice have been outlined and will be implemented in full.

5.17.7 There will be no direct or indirect impacts of the Proposed Development on European sites, or their mobile selection features, due to the following:

- The impacts from the construction of the Proposed Development will be of a temporary nature, and on a small scale in comparison with the size of the European sites.
- No resources will be required from within the European sites.
- No excavation of resources will be required from the European sites.
- Transportation of materials will be delivered to the site on the normal road network.
- Any emissions from construction will be managed through mitigation.

5.17.8 As the proposed mitigation measures will be implemented, it is considered that the Proposed Development will have no adverse effects on the integrity of any European site, either alone or in-combination with other plans or projects.

[57] Site of Community Importance
[58] Special Protection Area
[59] Qualifying Interest
[60] Special Area of Conservation

6.0 Planning Assessment

6.1 Compliance with National policy

Project Ireland 2040 – National Planning Framework

6.1.1 The Proposed Development will support the transition towards low carbon energy supply and increased renewable generation in line with the aims of the NPF. The proposed OCGT peaking plant will complement intermittent renewable sources of power by rapidly generating power for short periods of time when there is insufficient capacity to meet demand.

6.1.2 In doing so, it will help to reinforce the transmission network to facilitate growth of a more renewables-focused energy supply, as envisaged in NPF National Strategic Outcome 8 (Transition to Sustainable Energy)

6.1.3 The Proposed Development will provide resilience to Ireland's electricity grid and improve security of supply. In this respect it is in keeping with the key 'security of supply' principle for Energy Policy that is outlined in the NPF.

6.1.4 Furthermore, in accordance with Policy Objective 54 of the NPF, the Proposed Development will support national targets for climate policy mitigation objectives. By supporting renewable energy developments through enhanced security of supply, the Proposed Development will contribute to the Climate Action Plan's aim for at least 80% of electricity supply to be generated from renewables by 2030.

6.1.5 The Proposed Development will also support the transition to a low carbon economy as envisaged in 'The Energy Vision 2050' White Paper by helping to replace the generation capacity of older power stations which use carbon-intensive fuels such as peat and coal. The proposed OCGT peaking plant will run on Hydrotreated Vegetable Oil, which is a lower net carbon option for use in power generation.

6.1.6 Finally, the Proposed Development is consistent with National Policy Objective 52 of the NPF, which seeks to ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation. The comprehensive EIAR submitted with the planning application demonstrates that the Proposed Development will have no significant residual effects on the environment.

National Development Plan

6.1.7 The Proposed Development will contribute to the creation of a long-term, sustainable, and competitive energy sector in Ireland in accordance with the overarching aim of the NDP for the energy sector.

6.1.8 The NDP recognises that the target of delivering up to 80% of Ireland's electricity from renewable sources by 2030 will require investment in renewable electricity generation and storage as well as conventional electricity generation capacity to support the operation of variable renewable technologies.

6.1.9 As a responsive dispatchable power generator, the Proposed Development supports Strategic Investment Priority no. 4, to deliver circa 2 GW of new conventional electricity generation capacity by 2030 to support the operation of a predominantly renewables-based electricity system and provide security of supply.

Policy Statement on Security of Electricity Supply (2021)

6.1.10 The Proposed Development will contribute to a key national priority in supporting the continued security of electricity supply at a national level.

6.1.11 It will provide quick response electricity generation capability which will help to maintain security of supply while supporting Ireland in its transition to a low carbon economy in line with the Government's Policy Statement.

Climate Action Plan

6.1.12 The Proposed Development will contribute to realising the need for rapid delivery of flexible conventional generation capacity, *"at scale and in a timeframe to replace emissions from coal and oil generation before the second budget period"*, which is highlighted in the latest Climate Action Plan (CAP23).

6.1.13 It will assist in meeting one of the key measures for the energy sector that is included in the Plan, i.e. the delivery of at least 2GW of new flexible generation capacity.

The Eirgrid/SONI Ireland Capacity Outlook 2022 - 2031

6.1.14 The Proposed Development will help address predicted capacity deficits during the years up to 2031 and will be part of a balanced portfolio of new generation capacity. It will assist in achieving the requirement, identified in the latest Capacity Outlook, for *"over 2000MW of enduring flexible...generation capacity"* to be delivered by 2030[61].

National Hydrogen Strategy

6.1.15 The National Hydrogen Strategy identifies flexible power generation – such as the Proposed Development - as one of the first sectors that will develop as a significant end-user of renewable hydrogen. The Proposed Development provides the potential for conversion to hydrogen use in the future. It will provide a long-term sustainable generation asset for the national grid.

[61] Eirgrid/SONI (2022), Ireland Capacity Outlook 2022 – 2031 (Page 6)

6.2 Compliance with regional policy

Regional Spatial and Economic Strategy

6.2.1 The Proposed Development will support the growth and resilience of the Region, both directly and indirectly. It will provide greater resilience to Ireland's electricity grid and in doing so will indirectly support the wider economic growth ambitions of the Region, which rely on secure energy supply.

6.2.2 The Proposed Development will strengthen the grid for all electricity users, and in doing so will improve the security and quality of energy supply. The RSES notes that improving security of supply is particularly important if the Region is to attract high technology industries that depend on a reliable, high quality electricity supply.

6.2.3 The proposal is in keeping with RPO 8.1 which supports the development of a safe, secure and reliable electricity network and the transition towards a low carbon economy centred on energy efficiency. As outlined above, the Proposed Development will facilitate the transition towards a low carbon energy sector by supporting an increasing amount of renewable generation sources and replacing reliance on generation capacity from older, more carbon intensive power plants.

6.3 Compliance with local policy

Kerry County Council – County Development Plan 2022-2028

6.3.1 The Proposed Development would contribute to the achievement of an overarching aim of the CDP. The Plan recognises that the availability of energy is of critical importance to the continued development and expansion of employment in the Kerry and seeks to ensure that there is sufficient capacity to meet the current and future needs.

Chapter 12: Energy

6.3.2 The proposed development contributes to the realisation of the following policy objectives:

- **Policy 12-1 – Energy** *'Support and facilitate the sustainable provision of a reliable energy supply in the County, with emphasis on increasing energy supplies derived from renewable resources whilst seeking to protect and maintain biodiversity, archaeological and built heritage, the landscape and residential amenity and integration of spatial planning and energy planning in the county'*[62].
- **Policy 12-7 – Transmission Grid** *'Support and facilitate the sustainable development of enhanced electricity and gas supplies, additional electricity generation capacity, and associated networks, to serve the existing and future needs of the County*[63].

[62] Kerry County Council (2022), Kerry County Development Plan 2022-2028, page 254
[63] Kerry County Council (2022), Kerry County Development Plan 2022-2028, page 256

- **Policy 12-16 – Renewable Energy** '*Facilitate and promote sustainable alternative forms of renewable energy including hydro, bio, solar, geothermal and off-shore wind energy*[64]'; *To support and liaise with statutory and other energy providers in relation to power generation, in order to ensure adequate power capacity for the existing and future needs of the County'.*

6.3.3 The Proposed Development would support renewable generation technologies, enhance the security of supply and diversify sources of supply.

6.3.4 It complies with the aims of Chapter 12 of the CDP, which supports International, National and County initiatives for limiting emissions of greenhouse gases through the development of renewable energy sources where such development does not have a negative impact on the surrounding environment (Policy 12-1). In this regard, the Proposed Development – by enhancing security of supply during the transition to a more renewables-based system - will contribute towards the national objective to achieve 80% renewable electricity by 2030, and the submitted EIAR demonstrates that the Proposed Development will have no significant residual effects on the environment.

6.3.5 The Proposed Development contributes to the expansion of low carbon infrastructure and generation capacity for Kerry in accordance with the aims the Development Plan. The Proposed Development also very clearly accords with Policy 12-7 in facilitating sustainable development of additional electricity generation capacity to serve the existing and future needs of the County.

6.3.6 The Proposed Development also sustainably supports and augments renewable energy generation in County Kerry in accordance with Policy 12-16.

6.3.7 The proposal will help deliver low carbon electricity generation capacity in a sustainable manner, which is of critical importance to the future development of the county. Overall, it is considered that the Proposed Development complies with the relevant policies presented in chapter 12 of the CDP.

Chapter 2: Climate Change & Achieving A Sustainable Future

6.3.8 In line with the aims of Chapter 2, the Proposed Development supports people and employment while transitioning to a low carbon society which safeguards and enhances the environment.

6.3.9 The plant will run on HVO, which is a lower net carbon option for use in power generation. It will also contribute significant private sector capital investment in the regional economy, with up to 200 construction jobs as well as supply chain opportunities for local businesses. The proposed development also makes efficient use of brownfield land adjoining an existing Power Station, benefitting from existing transmission infrastructure; and supports economic development objectives which rely on secure energy supply.

6.3.10 It is considered that the proposed development accords with the aims presented in chapter 2 of the CDP.

[64] Kerry County Council (2022), Kerry County Development Plan 2022-2028, page 257

Chapter 9: Economic Development

6.3.11 The Plan notes that '*The Strategic Development Location (SDL) at Tarbert/Ballylongford in North Kerry is recognised for its potential as an Energy Hub and for industrial development at a regional and national level'*[65]. It sets out the following policy objective to support the 'Strategic Development Location'.

Policy 9-26 Shannon Estuary '*Safeguard the role and function of the Power Plant Hub at Tarbert, including the NORA Strategic Oil Reserves Plant, as a key driver of economic growth in the Region, encouraging its sustainable growth and diversification, in accordance with Regional and National Energy Objectives'*.

6.3.12 The proposed development safeguards the role and function of the Tarbert Power Plant Hub at a key juncture, with the existing HFO Power Plant due to cease operations by the end of 2023. It will enable the site to remain a key driver of economic growth for the Region and contribute to the realisation of Regional and National Energy Objectives.

6.3.13 It is considered that the proposed development accords with the policy presented in chapter 9 of the CDP.

6.4 Development Benefits

6.4.1 The Proposed Development is urgently needed to provide resilience to Ireland's electricity grid and address forecast electricity capacity shortfalls. It will support the increased roll out of renewable generation technologies and replace generating capacity lost through the planned retirement of ageing, more carbon intensive conventional power stations.

6.4.2 It will provide a wide range of development benefits, including:

- 350MW additional generation capacity to meet increasing electricity demand and address forecast capacity shortfalls;
- The power plant will run on HVO, which is a lower net carbon option for use in power generation;
- Significant private sector capital investment in the regional economy;
- Up to 200 construction phase jobs as well as supply chain opportunities for local businesses;
- Long term local employment during the operational phase, with up to 14 qualified personnel required for the operation, maintenance and management of the plant;
- Efficient use of brownfield land used as part of a Power Station, benefitting from existing transmission infrastructure;
- Potential for conversion to hydrogen use in the future, subject to planning permission;

[65] Kerry County Council (2022), Kerry County Development Plan 2022-2028, page 178

- Supports economic development objectives which rely on secure energy supply;
- The applicant is committed to the provision of a community gain proposal linked to the Proposed Development. Building on pre-application engagement, the applicant will continue to work collaboratively with the local community and stakeholders, through ongoing consultation, to understand the principles that this should be aligned with.

6.5 Assessment Conclusions

6.5.1 The policy assessment undertaken demonstrates that the Proposed Development will be consistent with and contribute towards the achievement of proper planning and the sustainable development of the area in which it is located.

6.5.2 It will contribute to the achievement of national targets, as outlined in the National Development Plan and Climate Action Plan, to increase the share of renewable energy generation to 80% and to deliver circa 2 GW of new conventional generation capacity by 2030.

6.5.3 It will also help to facilitate the transition to a low-carbon economy by accelerating the use of biofuel in the generation of electricity and supporting the transition to a more diverse renewables-based system. The reserve power provided by the proposed OCGT will support intermittent renewable generation technologies while improving the security of electricity supply and, furthermore, the development will safeguard the role and function of the Power Plant Hub at Tarbert as a key driver of economic growth for the region.

7.0 Conclusion

7.1 The need for the Proposed Development is clearly established and it is in accordance with planning policy at all levels.

7.2 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 ('CAP23') also emphasises the need for urgent delivery of new dispatchable generation capacity. The Proposed Development will contribute to meeting the increasingly urgent requirement for new flexible generation capacity to be delivered rapidly and at scale.

7.3 The site of the Proposed Development, within the existing industrial context of the Tarbert Power Station complex, and adjoining existing transmission infrastructure, makes it ideally suited for the type of development proposed.

7.4 The Proposed Development will safeguard the role and function of the Power Plant Hub at Tarbert and ensure that it remains a key driver of economic growth for the region.

7.5 The Proposed Development will have limited environmental effects, as evidenced in the EIAR submitted with the application, which concludes that the Proposed Development will have no significant residual effects on the environment.

7.6 It will provide a wide range of benefits, including:

- 350MW additional generation capacity to meet increasing electricity demand and address forecast capacity shortfalls;
- The power plant will run on HVO, which is a lower net carbon option for use in power generation;
- Significant private sector capital investment in the regional economy;
- Up to 200 construction phase jobs as well as supply chain opportunities for local businesses;
- Long term local employment during the operational phase, with up to 14 qualified personnel required for the operation, maintenance and management of the plant;
- Efficient use of brownfield land used as part of a Power Station, benefitting from existing transmission infrastructure;
- Potential for conversion to hydrogen use in the future, subject to planning permission;
- Supports economic development objectives which rely on secure energy supply;

- The applicant is committed to the provision of a community gain proposal linked to the Proposed Development. Building on pre-application engagement, the applicant will continue to work collaboratively with the local community and stakeholders, through ongoing consultation, to understand the principles that this should be aligned with.

7.7 Considering the urgent need for the Proposed Development, its significant benefits, its compliance with planning policy and its limited environmental impact, it is respectfully requested that planning permission is granted without delay.