

Our Case Number: ABP-311233-21



An
Bord
Pleanála

Re: 10-year permission for proposed Shannon Technology and Energy Park consisting of power plant, battery energy storage system, floating storage and regasification unit, jetty, onshore receiving facilities, above ground installation and all ancillary structures/works.
Townlands of Kílcolgan Lower and Ralappane, Ballylongford, Co. Kerry.

Dear Sir / Madam,

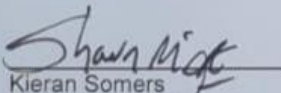
I have been asked by An Bord Pleanála to refer further to the above-mentioned case.

Please be advised that the Board has sought further information from the applicant as per its letter dated the 5th July 2022. A copy of the said request is attached herein for your information. I trust this is of assistance to you.

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

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

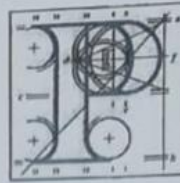

Kieran Somers
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Our Case Number: ABP-311233-21
Your Ref: Shannon LNG Limited



An
Bord
Pleanála

Barry Sheridan
AECOM Infrastructure and Environment Ireland Limited
4th Floor Adelphi Plaza
Adelphi Centre
Georges Street Upper
Dun Laoghaire

Date: 5th July 2022

Re: 10-year permission for proposed Shannon Technology and Energy Park consisting of power plant, battery energy storage system, floating storage and regasification unit, jetty, onshore receiving facilities, above ground installation and all ancillary structures/works.
Townlands of Kilcolgan Lower and Ralappane, Ballylongford, Co. Kerry.

Dear Sir,

I have been asked by An Bord Pleanála to refer further to the above-mentioned proposed development which is before the Board for consideration.

Please be advised that the Board, in accordance with section 37(F)(1) of the Planning and Development Act, 2000, as amended, hereby requires you to furnish the following further information in relation to the effects on the environment of the proposed development: .

1. The proposed development comprises a number of elements, including a 600MW gas-fired Power Plant and 120 MWh battery energy storage system, and a Liquefied Natural Gas (LNG) Terminal and above ground installation (AGI). Considerations relevant to such development include national policy relating to climate action and energy security and recent updates to such policy context include the following:
 - Climate Action Plan 2021 (Nov 2021)
 - Policy Statement on Security of Electricity Supply (November 2021) and
 - National Energy Security Framework (April 2022)

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The applicants are requested to review the application documentation to address how the different elements of the proposed development comply with national policy, including these most recent policy documents, and the degree of interdependence between those elements. In addition, the response should address the implications for the proposed LNG Terminal of the on-going Review of the Security of Energy Supply of Ireland's Electricity and Natural Gas Systems.

The applicants are also requested to provide further elaboration and rationale in respect of the send-out capacity of the proposed LNG terminal, in the context of projected national future gas demand.

2. Further elaboration and clarification is requested in respect of the calculation of emissions set out in Chapter 15 of the EIAR.
 - a) The applicants are requested to reconcile the operational emissions figures set out in Table 15-17 and Table 15-20 of Volume 2 of the EIAR and clearly detail the basis for the figures cited therein.
 - b) The basis for the carbon emission factor of 184g per Kwh for natural gas electricity generation referenced on page 15-26 of Volume 2 of the EIAR should be clarified, and its appropriateness having regard to the observation on page 15.27 that the upstream emissions of LNG are greater than those of natural gas within the gas networks.
 - c) The applicants are requested to reconcile the figure for direct operational emissions referenced on page 29 of Volume 1 of the EIAR (NTS) of approximately 963kt CO₂e in 2030, with the operational emissions figures set out in Table 15-17 of Volume 2.
3. With regard to the proposed Battery Energy Storage System (BESS), the applicants are requested to clarify whether charging of the BESS can be undertaken directly from the electricity grid or whether charging can only be undertaken via power generated by the CCGT power plant.
4. Further information is required with regard to the potential impact of the development on the integrity of the Lower River Shannon cSAC due to the direct and permanent loss of habitats which are qualifying interests for this European Site, including Estuaries (1130) and Reefs (1170), having regard to the Conservation Objective to maintain the favourable conservation status of such habitats, based on the permanent area being stable or increasing and community types being conserved in a natural condition.

In addressing the potential adverse impacts on the Integrity of this European Site, the applicants are advised to consider inter alia, the following aspects of the development:

- The extent and duration of impact and disturbance beyond the footprint of piles and the outfall pipe during construction, including any disturbance associated with the use of jack-up platforms during piling activities.
- In addition to the extent of spatial loss, the ecological implications of habitat loss and the ecological importance of the function performed by the affected habitats in terms of rarity, location, distribution, vulnerability to change and ecological structure.
- Potential impacts on community types affected by the proposed development in terms of their conservation condition and distribution, including Subtidal sand to mixed sediment with *Nucula* nucleus community complex, and *Furoid*-dominated intertidal reef community complex. The impact / loss of such community types should also be described in the context of the estimated area occurring within each of the relevant habitat types.

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5. Further consideration and clarification is required in respect of potential ex-situ impacts on wintering birds using the development site and / or adjoining lands. Your attention is drawn to an inconsistency between the EIAR and NIS, where sections 7B4.6.2 *Estuarine Birds* and 7B.5.3.7 *Birds* of the EIAR report that Curlew, as well as Snipe, were regularly recorded foraging on the development site during various survey periods; while section 3.3.4.1 of the NIS states that no foraging conservation feature species were recorded within the development site. The response should consider potential disturbance of foraging activity of wintering birds, during construction and operational stages.
6. Further consideration should be given to the impacts of external lighting associated with the proposed development on waders and waterbirds using wetlands within the estuary area, by reason of light-spill or reflection during nights with low-cloud. Such consideration should be supplemented by additional night-time photomontage / images from the northern shore of the estuary, including Clonderlaw Bay, Co. Clare. A detailed assessment of the cumulative / in-combination effects with other industrial development on birds occurring in this part of the estuary should also be undertaken.
7. With regard to the potential for spillage of oil within the estuary, clarification is required with regard to proposals for the refuelling of visiting LNGC's and the FSRU at the subject site. Further detail in respect of the management of any oil spillage within the estuary should be provided in response to concerns expressed by the Development Applications Unit of the Department of Housing, Local Government and Heritage in their submission of 21/10/2021.
8. Further detail is required in relation to the location, timing and duration of blasting activity proposed on the site and the need for ecological supervision thereof. The requirement for a Method Statement in relation to estuarine birds, as referenced in section 7B.7.1.11 of the EIAR, should be reconciled with the conclusions of the NIS and mitigation measures identified therein. In responding to this matter, the applicants should refer to the submission from the Development Applications Unit of the Department of Housing, Local Government and Heritage on this application, dated 21/10/2021.
9. The applicants should also provide clarification in relation to the frequency of blasting activity proposed on the site. In this regard it is noted that section 9.7.3.2 of the EIAR and section 3.4.2 of the NIS refer to the occurrence of no more than three blasts per day. Modelling of Underwater Noise set out in Appendix 4 of the NIS and the scenarios assessed in Appendix 5, "*Impact Assessment of Potential Acoustic Effects*" are however, based on an assumption of one blasting event per day. The applicants should therefore reconcile the differing scenarios assessed with the conclusions reached in the NIS and EIAR.
10. Further information is required in relation to the potential operational effects of the proposed development on Natura sites within the zone of influence of the development in terms of impacts on air quality, and in particular nitrogen deposition.

In this regard, the Appropriate Assessment Screening Statement should clearly set out the basis for screening sites such as Moanveanlagh Bog SAC or Tullagher Lough and Bog cSAC, out of Stage II Appropriate Assessment. Regard should be had to conservation objectives for total N deposition for qualifying interests, including priority habitats within such sites where they apply, and the likelihood of significant effects thereon.

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11. Further elaboration and clarification should be provided with regard to the design of the proposed FSRU seawater intake, including the rationale for the intake velocity of 0.3m/sec and the proposed 5mm screen mesh size. Regard should be had to the maximum escape velocity for aquatic species which may be at risk of entrainment or impingement at the intake point.

The further information referred to above should be received by the Board, no later than 5.30 p.m. on Friday 19th August, 2022.

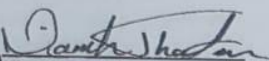
In this regard, please submit 2 no. hard copies and one electronic copy of the above information.

Please note that following its examination of any information lodged in response to this request for additional information, the Board will then decide whether or not to invoke its powers under section 37(F)(2) of the Planning and Development Act, 2000, as amended, requiring you to publish notice of the furnishing of any additional information and to allow for inspection or purchase of same and the making of further written submissions in relation to same to the Board.

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

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

Yours faithfully,


Kieran Somers
Executive Officer
Direct Line: 01-873 7250

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