Bord na Móna Powergen Limited

Planning Statement

Derrygreenagh Power

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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 Bord na Móna Powergen Limited[1] ('the Applicant') for a 710MW power plant development with electricity grid connection and associated buildings and infrastructure on land within the Derrygreenagh bog group in Co. Offaly.

- The site of the proposed power plant has previously been granted SID planning permission by An Bord Pleanála for a 600MW power plant[2]. No grid connection was included as part of that permission.

- With unprecedented pressure currently being experienced on security of electricity supply the development of new, dispatchable generation capacity is urgently required.

- A new consent is necessary to facilitate the installation of modern plant to comply with current industry standards and to enable connection to the national grid.

- The Proposed Development will make a significant contribution to addressing security of supply challenges and will complement, and provide back-up to, highly variable renewable sources such as wind and solar.

- It will provide a replacement for older, less efficient conventional power plants - that are planned for removal from the system in the short to medium term - with lower carbon technology.

- It is designed to facilitate a sustainable long-term transition to renewable fuels such as hydrogen, in line with commitments for blending renewable fuels into the gas network.

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

- The Proposed Development has been subject to a comprehensive EIA which concludes that it will have no significant residual effects.

- It has also been subject to comprehensive Appropriate Assessment which concludes that, following the implementation of mitigation measures, it will have no adverse impact on the integrity of any Natura 2000 sites, either alone or in-combination with other plans or projects.

[1] c/o Bord na Mona, Main Street, Newbridge, Co Kildare
[2] ABP Ref. 19.PA0011

- The Proposed Development will provide a wide range of benefits, including:

    - 710MW additional generation capacity to meet increasing electricity demand and address forecast capacity deficits;
    - A new source of flexible, dispatchable generation capacity to complement renewable technologies;
    - Supports the transition to a renewables-based grid;
    - Significant capital investment in the local and regional economy;
    - Up to 750 construction phase jobs as well as supply chain opportunities for local businesses;
    - Long term employment during the operational phase, with up to 60 qualified personnel required for the operation, maintenance and management of the plant;
    - Efficient re-use of underutilised brownfield land;
    - Supports economic development objectives which rely on secure energy supply;
    - A significant Community Benefit Fund (€450,000 over a 5-year period).

1.0 Introduction

1.1 This Statement is provided in support of a Strategic Infrastructure Development ('SID') planning application by Bord na Móna Powergen Limited[3] ('the Applicant') to develop a Combined Cycle Gas Turbine ('CCGT') and Open Cycle Gas Turbine ('OCGT') Thermal Power Plant, electricity grid connection and associated buildings and infrastructure (the 'Proposed Development') on land located primarily within the Derrygreenagh Bog Group in Co. Offaly[4].

1.2 The site of the proposed power plant was previously granted SID planning permission by An Bord Pleanála, in 2010, for a 600MW power plant including CCGT (430MW) and OCGT (170MW) units[5]. The duration of this consent was extended by Offaly County Council in 2019, and will expire in April 2025. No grid connection was included as part of the permission.

1.3 With unprecedented pressure currently being experienced on security of electricity supply, the development of new, dispatchable generation capacity is urgently required. A new consent is necessary to facilitate the installation of modern plant to comply with current industry standards ('Best Available Techniques (BAT) for Large Combustion Plant CID (EU)2021/2326') and to enable connection to the national grid.

1.4 The Applicant is a subsidiary of Bord na Móna PLC, which has gone through radical change in recent years, committing to the cessation of peat harvesting and focusing on developing climate solutions in renewable energy, sustainable waste management, carbon storage and biodiversity conservation. A key objective of its ongoing 'Brown to Green' transformation strategy is to continue using its landbank to underpin Ireland's energy independence by developing green, sustainable energy sources.

1.5 To support the national transition to a renewables-based system it is recognised that there is an urgent requirement for flexible, dispatchable generation capacity to complement, and provide back-up to, highly variable renewable sources such as wind and solar[6].

1.6 As part of its transformation strategy therefore, Bord na Móna intends to develop flexible, dispatchable gas-fired generation capacity at its site in Derrygreenagh.

[3] c/o Bord na Mona, Main Street, Newbridge, Co Kildare
[4] Part of the electricity grid connection, namely the 400kV substation connecting to the existing Oldstreet-Woodland 400KV overhead line, is to be located on agricultural land. The power plant itself is to be located on a brownfield site known locally as 'Derrygreenagh Works'.
[5] ABP Ref. 19.PA0011
[6] Refer, for example, to the latest Climate Action Plan ('CAP24') and to the Eirgrid and SONI 'Ten-Year Generation Capacity Statement 2023 – 2032'.

1.7 The Proposed Development will help to ensure security and stability of electricity supply into the future, underpin demanding renewable targets and provide investment certainty. The development of modern thermal technology will also facilitate the replacement of older, less efficient conventional power plants - that are planned for removal from the system in the short to medium term - with lower carbon technology. In addition, the development of modern gas-fired generation technology will facilitate a sustainable long-term transition to renewable fuels such as hydrogen, in line with commitments for blending renewable fuels into the gas network[7], with associated displacement of significant volumes of natural gas.

Description of Development

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

10-year planning permission to develop a Combined Cycle Gas Turbine ('CCGT') and Open Cycle Gas Turbine ('OCGT') Thermal Power Plant, Electricity Grid Connection including 2 no. substations, and associated buildings, plant, site works, services and ancillary development on land within the townlands of Knockdrin, Derrygreenagh, Derryarkin, Derryiron, Ballybeg, Coolcor, Barrysbrook, Clonin, Togher and Coole, Co. Offaly.

The Proposed Development will encompass a Power Plant Area and an Electricity Grid Connection.

The development of the Power Plant Area will include the following:

- *Demolition of existing buildings at the Derrygreenagh Works site (Including office building, boiler house, workshops, water tank and storage unit);*
- *Construction of CCGT power plant (570MW) [Including turbine hall and associated buildings, air cooled condensers ('ACC'), Heat Recovery Steam Generator ('HRSG'), air intake, emissions stack (60m high) with Continuous Emissions Monitoring System ('CEMS') and platform];*
- *Ancillary coolers;*
- *Fuel gas performance heating room*
- *Generator transformer and unit auxiliary transformer;*
- *OCGT power plant (140MW) [Including turbine enclosures, air intakes, fin fan coolers, emissions stack (45m high), electrical rooms, main transformer];*
- *Secondary fuel storage tanks and unloading area [Including unloading layby, 2 no. fuel storage tanks, fuel pumping and cleaning plant, fuel forwarding building];*
- *2 no. water abstraction boreholes;*
- *Raw water storage tank;*

[7] National Hydrogen Strategy

- *2 no. demineralised water storage tanks;*
- *Water treatment plant;*
- *Administration building and staff car park;*
- *Wastewater treatment plant;*
- *Workshop and stores building;*
- *Process water treatment plant;*
- *Gas Above Ground Installation ('AGI') compound [Including regulator building, instrumentation kiosks, palisade fencing];*
- *Gas receiving facility [Including gas compressor building, fin fan coolers, pressure reducing station];*
- *Drainage infrastructure [Including surface water attenuation tank, surface water discharge pipeline (Discharging to the Mongagh River), treated process and wastewater discharge pipeline (Discharging to the Yellow River)];*
- *A new site access from the R400 road;*
- *All internal access roads;*
- *Security fencing and gates;*
- *Landscaping*
- *Site works and services*
- *All ancillary infrastructure and plant [Including firefighting systems, fire water pumphouse, raw water pumphouse, emergency diesel generator, propane stores, chemical storage tanks and pumphouse, lube oil storage building, silencers, vents, drains, safety valves, lighting, and pipe gantries];*
- *A permanent Peat and Spoil Deposition Area ('PDA') of approx. 225,000 sq. m. will be located to the south-east of the Power Plant Area.*

The development of the Electricity Grid Connection will include the following:

- *A 220kV substation located to the west of the Power Plant Area and R400 road [Hybrid gas insulated switchgear ('GIS')/air insulated switchgear ('AIS') substation design including switchgear building; control room building; transformer bays; 2. no. lattice gantries (c. 20m high) to support overhead line connection; telecommunications mast (c. 36m high); security fencing; landscaping, new access on to R400 road];*
- *220kV overhead line running for c. 5km to the south of the 220kV substation, facilitated by double circuit suspension pylon towers (13 no.; c. 44m high) and strain pylon towers (6 no.; c. 38m high);*
- *220kV line-cable interface compound [Including interface tower gantry (c. 20m high); cable sealing ends; security fencing];*
- *220kV underground cable connection running for c. 3.4km to the south [With paved and gated service road and 12 no. joint bays to facilitate construction and servicing];*
- *A 400kV GIS substation located adjacent to the existing Oldstreet-Woodland 400kV overhead line [Including a 400kV GIS building; 220kV GIS building; transformer*

compound; 2 no. lattice gantries (c. 28m high) to support overhead line connection to 2 no. new loop-in strain towers (c. 32.5m high) on the Oldstreet-Woodland 400kV line; telecommunications mast (c. 36m high); security fencing; landscaping, access off L1010 road];

- *2 no. permanent Peat Deposition Areas will be provided as part of the Electricity Grid Connection – one to the north of the 400kV substation (c. 75,300 sq. m) and one to the south-west of the 220kV substation (c. 50,200 sq. m.);*
- *Tree Replanting Areas (c. 17.5 ha.) are proposed within the planning boundary to compensate for all tree felling requirements associated with the Proposed Development.*

1.9 The main component of the Proposed Development is a 710MW power plant comprising Combined Cycle Gas Turbine ('CCGT') and Open Cycle Gas Turbine ('OCGT') technology, fuelled by natural gas. The plant is designed to fill short term gaps in renewable generation as well as covering longer periods of low generation from renewable sources. This is a key part of the transition to a renewables-based grid, allowing more reliance on renewable sources when available, with a responsive and high-efficiency alternative available when needed.

1.10 The electricity grid connection will be ancillary to the power plant and has been designed in accordance with Eirgrid transmission policies and requirements. It will run to the south of the power plant site, with electricity transmitted from the main transformer to a new 220kV substation, west of the R400 road, via an underground cable. The 220kV substation will feed a 220kV overhead line with 19 pylon towers before changing to an underground cable connection via a 'Line-Cable Interface Compound'. The underground cable will connect to a new 400kV substation which, in turn, will connect to the existing Oldstreet-Woodland 400kV transmission line by way of a loop-in connection.

1.11 The plant will require connection to the high-pressure gas transmission network, which will be facilitated by way of an Above Ground Installation ('AGI') within the power plant site. A new pipeline connection to the Dublin-Galway high-pressure gas transmission line (BGE/77) will run within a corridor to the north of the site. This pipeline connection will be subject to a separate consent by Gas Networks Ireland (GNI) under Section 39A of the Gas Act[8], and does not form part of this planning application. The environmental impact of the pipeline connection, based on the preferred corridor advised by GNI, is assessed in so far as reasonably practicable within the Environmental Impact Assessment Report (EIAR) that is included with the application.

1.12 The detail of the Proposed Development is outlined further in Section 3 of this Statement, and in Chapter 5 of the EIAR that is included with the application.

[8] Gas Act 1976, as amended

Need for Development

1.13 The need for the Proposed Development is clearly established. The National Development Plan (2021-2030) (NDP)[9] 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'[10], published in November 2021, and Eirgrid's 'Ten-Year Generation Capacity Statement 2023 – 2032', published in January 2024[11]. The latest Climate Action Plan ('CAP24') also emphasises the need for urgent delivery of new gas-fired generation capacity[12].

1.14 The NDP identifies an *urgent requirement* to deliver circa 2 GW of new conventional (mainly gas-fired) generation capacity by 2030, alongside c. 15.5 GW of new renewable capacity just to keep pace with increased demand for electricity. The delivery of new capacity in recent years however, has been well below required levels, and most of the dispatchable capacity that was expected to come online over the coming years has now been withdrawn[13]. As a consequence, Eirgrid and SONI's latest Generation Capacity Statement forecasts capacity deficits across the 10 year period to 2032.

1.15 The security of supply 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

1.16 In addition, significant existing generation capacity is scheduled to be retired over the coming years, and risks around extended periods of low renewable output and delays in the delivery of planned offshore capacity must also be countered.

1.17 New dispatchable generation capacity, which can respond to shortfalls in power generation at times of high demand, is therefore essential and its delivery must be prioritised. The aforementioned Generation Capacity Statement notes that this must include both OCGT and CCGT technology: *"It is crucial that a balanced portfolio of new capacity is delivered, such as long duration storage, interconnection, demand side and renewable-ready open cycle and combined cycle gas turbines"*[14].

[9] https://www.gov.ie/en/publication/774e2-national-development-plan-2021-2030/
[10] https://www.gov.ie/en/publication/a4757-policy-statement-on-security-of-electricity-supply/#
[11] https://cms.eirgrid.ie/sites/default/files/publications/19035-EirGrid-Generation-Capacity-Statement-Combined-2023-V5-Jan-2024.pdf
[12] https://www.gov.ie/en/publication/7bd8c-climate-action-plan-2023/
[13] Eirgrid/SONI, 'Ten-Year Generation Capacity Statement 2023 – 2032', Part A, Section 1.3
[14] Eirgrid/SONI, 'Ten-Year Generation Capacity Statement', Part B, Preface

1.18 The urgent need for delivery has been clear for some years, and was 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"*.

1.19 The latest Climate Action Plan further emphasises the need for urgent delivery, stating that *"rapid delivery of flexible gas generation is required at scale and in a timeframe to replace emissions from coal and oil generation as soon as possible to reduce the impacts of the carbon budget"*[15].

1.20 The Proposed Development is designed - in response to the very clear need - to fill short term gaps in renewable generation, as well as covering longer periods of low generation from renewable sources. This will help to maintain security of supply while supporting Ireland in its transition to a low carbon economy, in line with NDP and CAP24 objectives.

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

Location of Development

1.22 The Proposed Development is situated on land within the townlands of Knockdrin, Derrygreenagh, Derryarkin, Derryiron, Ballybeg, Coolcor, Barrysbrook, Clonin, Togher and Coole in Co. Offaly.

1.23 The planning application boundary is entirely within the administrative area of Offaly County Council and the application will be available for inspection at the offices of Offaly County Council accordingly[16].

1.24 The Power Plant Area – the 'Derrygreenagh Works' site - is located approximately 6km to the north-west of Rhode in Co. Offaly and approximately 4km to the southeast of Rochfortbridge in Co. Westmeath. It is a brownfield site containing a number of buildings associated with Bord na Móna peat-harvesting operations (and, more recently, with land management and environmental monitoring activity), including workshops, stores, offices and outhouses. A number of these existing buildings are to be demolished as part of the Proposed Development.

[15] CAP24, p. 153
[16] Offaly County Council, Áras an Chontae, Charleville Road, Tullamore, Co. Offaly

1.25 The principle of power plant development on this site has been established for some time, with An Bord Pleanála granting SID planning permission in 2010 for a 600MW power plant including CCGT (430MW) and OCGT (170MW) generation units[17].

1.26 The proposed Electricity Grid Connection route starts to the west of the Power Plant Area, on the western side of the R400 road, where a new 220kV substation will be located. An overhead line and pylon towers will run for c. 5km to the south of the 220kV substation over Bord na Móna cutaway bogs, before being undergrounded at the proposed 'Line-Cable Interface Compound' c. 1km north of the L1010 Togher road.

1.27 An underground cable route will then continue south to a proposed 400kV substation located on agricultural land close to the existing 400kV overhead line transmission network.

1.28 The overall site area measures c. 312 hectares.

1.29 Further detail of the site and its surroundings is provided in Section 2 of this Statement and in Chapter 4 of the submitted EIAR.

Strategic Infrastructure

1.30 The total energy output of the Proposed Development will be 710MW and, as such, it constitutes 'Seventh Schedule' development under the Planning and Development Act ('the Act'), i.e. *'A thermal power station or other combustion installation with a total energy output of 300 megawatts or more'*.

1.31 It constitutes 'Strategic Infrastructure Development' (SID) under the terms of Section 37A of the Act, as it is clearly of strategic economic importance to the State and the region. Furthermore, it will contribute significantly to the realisation of national and regional planning objectives and, in delivering a nationally significant quantum of dispatchable generation capacity to the grid, will have effects beyond the local planning authority area in which it is situated.

1.32 A SID application to An Bord Pleanála is therefore the appropriate procedural route for the Proposed Development.

1.33 An Bord Pleanála has confirmed the SID status of the Proposed Development by way of a Determination issued in July 2023[18]. It has instructed that an application for the Proposed Development be made directly to An Bord Pleanála under Section 37E of the Act.

[17] ABP Ref. 19.PA0011

[18] A copy of which is included with the planning application.

Compliance with Policy

1.34 This Statement will demonstrate that the Proposed Development is consistent with, and contributes towards, the proper planning and sustainable development of the area in which it is located, in line with policies and objectives at national, regional and local level. The planning policy context is outlined in Section 4 of this Statement, and in Chapter 2 of the submitted EIAR.

Development Benefits

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

- 710MW additional generation capacity to meet increasing electricity demand and address forecast capacity shortfalls;
- A new source of flexible, dispatchable generation capacity to complement renewable technologies;
- Supports the transition to a renewables-based grid;
- Significant capital investment in the local and regional economy;
- Supports economic development objectives which rely on secure energy supply;
- Up to 750 construction jobs as well as supply chain opportunities for local businesses;
- Up to 60 long-term employment positions during the operational period;
- Efficient re-use of underutilised brownfield land;
- A significant Community Benefit Fund (€450,000 over a 5-year period)

Planning Statement - Structure and Content

1.36 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.

1.37 It should be read in conjunction with the full suite of drawings and documents submitted with the application, including the Environmental Impact Assessment Report and Natura Impact Statement prepared by AECOM, and is set out as follows:

- Section 1 - Introduction
- Section 2 - Site Details
- Section 3 - Proposed Development
- Section 4 - Policy & Legislative Context
- Section 5 - Environmental Impact
- Section 6 - Planning Assessment
- Section 7 – Summary & Conclusion

2.0 Site Details

2.1 Site Description

2.1.1 The site of the Proposed Development is situated on land within the townlands of Knockdrin, Derrygreenagh, Derryarkin, Derryiron, Ballybeg, Coolcor, Barrysbrook, Clonin, Togher and Coole in Co. Offaly. The overall area of the planning application site is c. 312 hectares.

2.1.2 The Proposed Development comprises two main elements:

- The Power Plant Area;
- The Electricity Grid Connection;

2.1.3 The Power Plant Area is located on the existing 'Derrygreenagh Works' site and measures approximately 49 hectares. It is adjacent to and east of the R400 road, c. 2.2km to the south-east of junction 3 on the M6 motorway.

2.1.4 The 'Derrygreenagh Works' site was used previously as a base for peat harvesting operations and consists of an office, stores and workshop complex.

2.1.5 The existing buildings will be demolished as part of the Proposed Development, with the office and workshop activities relocated to another Bord na Móna location prior to development commencing.

2.1.6 The Electricity Grid Connection area starts to the west of the Power Plant Area, on the western side of the R400 road, where a new 220kV substation will be located. An overhead line and pylon towers will run for c. 5km to the south of the 220kV substation over Bord na Móna cutaway bogs, before being undergrounded at the proposed 'Line-Cable Interface Compound', c. 1km north of the L1010 Togher road.

2.1.7 An underground cable route will then continue south, beneath the L1010 Togher road, following the route of the existing narrow gauge railway which crosses Coolcor Stream, before connecting to a proposed 400kV substation located on agricultural land close to the existing 400kV overhead line transmission network.

2.1.8 The 220kV substation location is partly brownfield in character, with limited mature trees and grassland, and cutover bogs with varying degrees of vegetation. There is a narrow railway crossing from west to east towards the Power Plant Area via an underpass below the R400 road.

2.1.9 The overhead line connection to the south will run through bogs associated with historic peatland harvesting. It transitions to a proposed underground cabling connection via the proposed 'Line-Cable Interface Compound', which is to be located in the southern section of Ballybeg bog.

2.1.10 The underground grid connection cable is approximately 3.2km in length and initially follows an existing railway line and machine pass corridor on Bord na Móna lands for c. 2.8km (south of Line-Cable Interface Compound) before routing through c. 550m of third-party agricultural land to link into the 400kV substation, which is to be located on agricultural land to the south of the L1010 road.

2.2 Surrounding Area

2.2.1 The lands surrounding the existing 'Derrygreenagh Works' site are rural in nature, but also include a number of industrial activities. There are three quarries within the vicinity of the site, a Cement Roadstone gravel quarry to the north-west, a sand quarry to the north-east and Kilmurray pre-cast sand and gravel quarry to the south-east. The wider area around the Proposed Development site is characterised by a dispersed population with a number of individual houses on the R400, Knockdrin Road, and L-1010 Togher road.

2.2.2 The site is surrounded by the following features:

Power Plant Area

- North of Power Plant Area – Rochfortbridge Co. Westmeath (c. 4km), M6 Motorway (c. 2km);
- East of Power Plant Area – Kilmurray S&G quarry (c. 300m), Rhode Co. Offaly (c. 1km), Black Castle Bog NHA (c. 7.5km);
- South of Power Plant Area – residential properties (c. 1km), Raheenmore Bog SAC (also designated as a nature reserve) (c. 7.1km east), Daingean Bog NHA (c. 11.3km southeast); and
- West of Power Plant Area – R400 road, Cloncrow Bog (New Forest) (c. 8.1km west).

Electricity Gird Connection

- North of Electricity Grid Connection – Rochfortbridge, Co. Westmeath (c. 4.5km), M6 Motorway (c. 2.5km);
- South of Electricity Grid Connection - Grand Canal pNHA (002104) (65m south from 400kV substation)
- East of Electricity Grid Connection - Rhode Co. Offaly (c. 1km);
- West of Electricity Grid Connection - Lough Ennell pNHA (c. 10.8km west)

2.2.3 Full details of the site and surrounding environment are available within EIAR Chapter 4.

2.3 Planning History

Site

2.3.1 An Bord Pleanála granted SID planning permission in April 2010 for the construction of a 600MW power plant on the existing 'Derrygreenagh Works' site, comprising a 430MW CCGT unit and a 170MW OCGT unit[19]. In 2019 a 5-year extension to this permission was granted by Offaly County Council, extending the life of the consent to 2025. The extant permission does not include a grid connection.

2.3.2 In assessing the application An Bord Pleanála's Inspector noted that the power plant would help in advancing national policy with regard to ensuring sufficient capacity to meet increasing demand, and would also help to advance *"the expansion and large scale deployment of wind on the power system"*[20].

2.3.3 The Inspector's Report noted that the proposal was in accordance with *"national and regional spatial policies and objectives as set out in the NSS and the Regional Planning Guidelines"* and that its location *"on a brownfield site within an area which has a dispersed population structure"* would accord with Development Plan policies and objectives with regard to provision electricity infrastructure and redeveloping brownfield sites for enterprise and employment creation[21].

2.3.4 It was concluded that the *"proposed development would not seriously injure the amenities of the area or of property in the vicinity, would not be prejudicial to public health or safety, would be acceptable in terms of traffic safety and convenience, would be acceptable in terms of its effect on the environment and would, therefore, be in accordance with the proper planning and sustainable development of the area"*[22].

2.3.5 The current application, if granted, will generate a new planning consent under which Derrygreenagh Power will be developed out, but is consistent with the principle established by the extant consent.

2.3.6 There is very limited additional planning history relating to the site itself. Details of relevant determined applications are set out on the submitted planning application form.

[19] ABP Ref. 19.PA0011
[20] 19.PA0011, Inspector's Report, p 50 of 59
[21] 19.PA0011, Inspector's Report, p 50 of 59
[22] 19.PA0011, Decision Notice

Surrounding Area

2.3.4 A comprehensive review of planning history for the surrounding area has been undertaken as part of the Environmental Impact Assessment process. The detail of this is set out in Appendix 4A of the submitted EIAR. Of note is the extent to which the area is becoming a hub for energy development. A significant amount of energy-related development has been approved over the last five years within 1km of the Site. Detail of this is set out in Table 1 below.

Reference/ Local Authority	Date submitted	Applicant name	Location and description	Status
An Bord Pleanála – WCC ABP-312783	16/02/2022	Lumcloon Energy Ltd	Rochfortbridge 220kV Gas Insulated Switchgear (GIS) Electrical substation and two 220kV underground transmission cables	Granted 09/09/2022 Permitted
Offaly CC 20237	23/06/2020	Newleaf Energy Ltd	Rhode Development of a combined heat and power generating biomass gasification plant.	Granted 06/05/2021 Permitted
Offaly CC 20238	23/06/2020	Rhode Energy Storage Ltd	Rhode An energy storage facility designed to provide system support services to the electricity grid on a 2.7-hectare site.	Granted 20/05/2021 Permitted
Offaly CC 19161	10/04/2019	Schwungrad Energie Ltd	Rhode Development of an energy storage facility designed to provide 20mw.	Granted 04/06/2019 Permitted

Reference/ Local Authority	Date submitted	Applicant name	Location and description	Status
Offaly CC 22664	21/12/2022	Eirgrid PLC	Rhode Construction of a 110kv substation.	Granted 23/02/2023 Permitted
An Bord Pleanála – OCC ABP-309491	22/02/2021	OBM solar Ltd	Rhode 110kV substation, associated 110kV underground grid connection, cabling and associated works	Granted 13/10/2021 Permitted
An Bord Pleanála – OCC ABP-304925	17/07/2019	Highfield Solar Ltd	Rhode Solar pv energy development within a site area of approximately 15ha.	Granted 11/03/2021 Permitted
Offaly CC 21488	06/08/2021	OBM Solar Ltd.	Rhode a 10 year permission for the construction of an extension to the permitted solar pv and battery storage development permitted	Granted 10/12/21 Permitted
Westmeath CC 21515	21/09/2021	Lumcloon Energy Ltd	Rochfortbridge The development comprising 275MWe reserve gas-fired generator. An EIAR has been submitted.	Granted 11/05/2022 Permitted

Table 1 - Notable planning consents within 1km of the Proposed Development site

3.0 Proposed Development

3.1 Overview

3.1.1 The planning application seeks permission for the development of a major new Thermal Power Plant and electricity grid connection, together with associated buildings, plant, site works, services and ancillary development.

3.1.2 The total generation capacity of the plant will be 710MW, comprising a CCGT of 570MW and an OCGT of 140MW.

3.1.3 The associated grid connection will include new 220kV and 400kV substations to enable connection to the existing 400kV Oldtsreet - Woodland transmission line, which is located c. 8km to the south of the proposed power plant site.

3.1.4 The Proposed Development will deliver a strategically significant quantum of dispatchable generation capacity to the national grid. It will help to ensure security and stability of electricity supply into the future, underpin demanding renewable energy targets and provide enhanced investment certainty. The development of modern thermal technology, as proposed, will also facilitate the replacement of older, less efficient conventional power plants - that are planned for removal from the system in the short to medium term - with lower carbon technology.

3.1.5 The development of modern gas-fired generation technology will also facilitate a sustainable long-term transition to renewable fuels such as hydrogen, in line with commitments for blending renewable fuels into the gas network[23], with associated displacement of significant volumes of natural gas.

3.2 The Applicant

3.2.1 The Applicant, Bord na Móna Powergen Ltd., is a subsidiary of Bord na Móna PLC.

3.2.2 Bord na Móna PLC is a publicly owned company, originally established in 1946 to develop and manage some of Ireland's extensive peat resources on an industrial scale.

3.2.3 Bord na Móna lands extend to approximately 80,000 hectares in total and are located mainly in the Irish midlands. The company currently manages and operates a portfolio of thermal and renewable assets, including Edenderry Power Plant, Cushaling peaking plant, Cloncreen, Bellacorick, Mountlucas, Bruckana and Oweninny wind farms, Derrinlough windfarm (under construction), Timahoe North solar farm and the Drehid landfill gas facility.

[23] National Hydrogen Strategy, 2023

3.2.4 Bord na Móna has a long track record of developing energy projects, dating back to the development of the first generation of peat-fired power stations. In recent times, the business has gone through radical change, announcing the new 'Brown to Green' transformation strategy, committing to the cessation of peat harvesting, and focusing on developing climate solutions in renewable energy, sustainable waste management, carbon storage and biodiversity conservation. A key objective of this strategy is to continue using its landbank to underpin Ireland's energy independence by developing green, sustainable energy sources to assist with Ireland's objective to achieve 80% renewable electricity by 2030.

3.2.5 It is recognised that to achieve our renewable energy targets there is an urgent requirement for flexible, dispatchable generation capacity to complement, and provide back-up to, highly variable renewable sources such as wind and solar[24]. As part of its transformation strategy therefore, Bord na Móna intends to develop flexible, dispatchable gas-fired generation capacity at its site in Derrygreenagh.

3.3 Need for Development

Overview

3.3.1 The need for the Proposed Development is clearly established. The National Development Plan (2021-2030) (NDP)[25] emphasises 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'[26], published in November 2021, and Eirgrid and SONI's 'Ten-Year Generation Capacity Statement 2023 – 2032'. The latest Climate Action Plan ('CAP24') also emphasises the need for new gas-fired generation capacity.

3.3.2 The Proposed Development is urgently needed to provide resilience to Ireland's electricity grid and address forecast electricity capacity shortfalls. It is designed to fill short term gaps in renewable generation, as well as covering longer periods of low generation from renewable sources. This is a key part of the transition to a renewables-based grid, allowing more reliance on renewable generation when available, with a responsive and high-efficiency alternative in place when needed. The Proposed Development will also help to replace generation capacity lost through the planned retirement of more carbon-intensive power stations over the coming years.

3.3.3 The Climate Action Plan 2024 (Published December 2023) 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 gas-fired generation capacity such as that proposed is very clear. The Plan states that

[24] Refer, for example, to the latest Climate Action Plan ('CAP24') and to the Eirgrid and SONI 'Ten-Year Generation Capacity Statement 2023 – 2032'.
[25] https://www.gov.ie/en/publication/774e2-national-development-plan-2021-2030/
[26] https://www.gov.ie/en/publication/a4757-policy-statement-on-security-of-electricity-supply/#

'*rapid delivery of flexible gas generation is needed at scale and in a timeframe to replace emissions from coal and oil generation as soon as possible to reduce the impacts of the carbon budget*[27]. Key measures identified for the energy sector under the Plan include *"the delivery of at least 2 GW of new flexible gas-fired generation"*[28].

3.3.4 The need to develop new gas-fired power generation plants, such as the proposed development, has been made abundantly clear in national policy and sectoral strategy documents for some time, as set in more detail below.

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

3.3.5 'Ireland's Transition to a Low Carbon Energy Future 2015- 2030' (Government White Paper) set 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.

3.3.6 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, 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 natural gas. 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].

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

3.3.7 The Proposed Development will provide quick response capabilities to EirGrid in accordance with the DS3 Programme ('Delivering a Secure, Sustainable Electricity

[27] CAP24, Page 153
[28] CAP24, Page 148
[29] 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
[30] 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

System'). It will help to ensure that the network can operate reliably and efficiently into the future with the integration of additional renewable generation.

National Development Plan 2021-2030

3.3.8 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 challenges posed by current issues such as climate action and population growth.

3.3.9 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'*. 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.*[31]*'*

3.3.10 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 demand for electricity.

3.3.11 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.

3.3.12 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 supply. The NDP aims to deliver circa 15.5 GW of renewable generation capacity over its lifetime, alongside circa 2 GW of conventional capacity[32]. 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*

[31] p 126, National Development Plan 2021-2030 (4/10/2021) Department of Public Expenditure and Reform
[32] p 122, National Development Plan 2021-2030 (4/10/2021) Department of Public Expenditure and Reform

provide security of supply for when variable electricity generation (wind/solar) is not sufficient to meet demand[33]'.

Ten Year Generation Capacity Statement 2023-2032

3.3.13 EirGrid and SONI's latest all-Ireland Generation Capacity Statement forecasts capacity deficits over the 10 year period to 2032 and notes that *"the current outlook, based on the best information available, is serious and 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[34]".*

3.3.14 It states that *"further new electricity generation will be required to secure the transition to high levels of renewable electricity over the coming decades"*. The Statement is clear that this must include new gas-fired generation capacity - it notes that *"a balanced portfolio of new capacity is required and this includes the need for new cleaner gas fired generation plant"* [35].

3.3.15 It highlights that the availability of conventional generation capacity is a serious cause for concern and that most of the dispatchable capacity that was expected to come online over the coming years has now been withdrawn from the market. It notes that "*since 2018, less than 30 MW of new gas capacity has been delivered with 410 MW of new gas capacity terminating their contract"*[36].

3.3.16 The Statement is also clear that the balanced portfolio of new capacity that must be delivered in the coming years should include both OCGT *and* CCGT generation technology:

"It is crucial that a balanced portfolio of new capacity is delivered, such as long duration storage, interconnection, demand side and renewable-ready open cycle and combined cycle gas turbines" [37].

3.4 Pre-Application Consultation

3.4.1 The planning application has been informed by extensive pre-application consultation, as summarised below. Full detail of the consultation activity undertaken is set out in Chapter 6 of the EIAR, and associated Appendices.

[33] p 123, National Development Plan 2021-2030 (4/10/2021) Department of Public Expenditure and Reform
[34] p. 9 Eirgrid/SONI (2023), Ireland Capacity Outlook 2023 – 2032
[35] p.10 Eirgrid/SONI (2023), Ireland Capacity Outlook 2023 – 2032
[36] p.77 Eirgrid/SONI (2023), Ireland Capacity Outlook 2023 – 2032
[37] p.29 Eirgrid/SONI (2023), Ireland Capacity Outlook 2023 – 2032

An Bord Pleanála

3.4.2 The Applicant submitted a request to An Bord Pleanála in February 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 on 12th May 2023.

3.4.3 The principal matters discussed related to the need for the Proposed Development, the planning history of the main site area and issues pertaining to the development in terms of policy and potential environmental impact.

3.4.4 Formal closure of the Pre-Application Consultation was requested by the Applicant on 9th June 2023. The Board issued a Determination on 5th July 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.

3.4.5 As such, 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).

3.4.6 It should be noted that the red line boundary of the Proposed Development has been amended since the ABP Determination was issued, to facilitate a larger corridor for the grid connection, encompassing additional elements such as tree replanting areas. These elements do not impact on the status of the Proposed Development as SID.

Offaly County Council

3.4.7 A pre-planning meeting was held with Offaly County Council's Planning and Environmental Team in June 2023 to discuss the principle of the Proposed Development, the preliminary design proposal, the environmental assessment of the proposal and the applicant's opinion regarding SID (i.e. that the proposal does constitute SID, but that this would be subject to a determination by ABP).

3.4.8 Feedback provided by Council representatives has informed the design proposal for planning, with amendments made to the design including more extensive cladding of the power plant elements and a change in the location of the 400kV substation. Council representatives have been kept informed of the project's progress subsequent to the meeting.

Environmental Protection Agency

3.4.9 The Proposed Development will be subject to Environmental Protection Agency (EPA) licensing, and pre-application engagement and consultation has been undertaken with the EPA in accordance with published guidance ('Licence Application Form Guidance, Industrial Emissions (IE), Integrated Pollution Control (IPC) and Waste

Version 2.1 - June 2021') to discuss requirements in relation to EIA and the approach to the project with regard to licencing.

3.4.10 Meetings with the EPA were held on the 07 July 2022 and 27 March 2023, attended by Bord na Móna Powergen Limited and their consultant team. At these meetings the EPA was informed of the Proposed Development, Overall Project and planning application timeline. It was given the opportunity to provide feedback or raise questions regarding the design process, EIAR contents, or any other information.

Stakeholder Bodies

3.4.11 A wide range of additional statutory and non-statutory stakeholder bodies has been consulted as part of the design development and EIA process, including government departments, statutory bodies, environmental organisations, utilities companies and telecommunications providers. A full list of the bodies consulted is set out in Chapter 6 of the EIAR. Detail of the consultation responses received is set out in Appendices 6C, 6D and 16A of the EIAR.

Public Consultation

3.4.12 A range of community engagement initiatives have been undertaken by Bord na Móna Powergen Ltd. prior to the submission of the planning application. These have included:

- Notification of local representatives;
- Notification of local community groups;
- Community information sessions;
- Direct correspondence and meetings;
- Dedicated Project website.

3.4.13 Full details of consultation methods used are presented in the Bord na Móna Community Consultation Report (Refer to Appendix 6E, EIAR Volume II).

Statutory Consultation and Public Notices

3.4.14 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 also notified the public of this application by means of erecting site notices on the relevant lands and publishing a newspaper notice in the Irish Independent and the Offaly Topic, which are both approved for use by Offaly County Council and in circulation in the

area of the planning application. Copies of the site notice and newspaper notices are included in the planning application pack.

3.4.15 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.

3.5 Description of Development

3.5.1 The main component of the Proposed Development is a 710MW power plant comprising Combined Cycle Gas Turbine ('CCGT') and Open Cycle Gas Turbine ('OCGT') technology, fuelled by natural gas.

3.5.2 The electricity grid connection, while significant in its own right, is ancillary to the power plant. It has been designed in accordance with Eirgrid transmission policies and requirements.

3.5.3 The grid connection will run to the south of the power plant, with electricity transmitted from the main transformer to a new 220kV substation, west of the R400 road, via an underground cable. The 220kV substation will feed a 220kV overhead line with 19 pylon towers before changing to an underground cable connection via a 'Line-Cable Interface Compound'. The underground cable will connect to a new 400kV substation which, in turn, will connect to the existing Oldstreet-Woodland 400kV transmission line by way of a loop-in connection.

3.5.4 Permanent peat / soil deposition areas will be provided in the vicinity of the power plant area as well as the two substations to store excess material which cannot be used in localised landscaping or backfill. The peat and soil deposition areas will not exceed 1m above ground level and will be suitably profiled to eliminate risk of movement or slippage of material.

3.5.5 Tree planting areas will also be provided at a number of locations in order to compensate for tree felling associated with the works required for the Proposed Development.

3.5.6 A summary list of individual elements within the Proposed Development is set out in Section 3.6 of this Statement, with full detail provided in Chapter 5 of the EIAR. Refer also to the submitted planning drawings for detail.

3.6 Development Components

Power Plant Area

Demolition Works

- Demolition of existing buildings including office, boiler house, workshops, water tank and storage unit

Combined Cycle Gas Turbine

- CCGT Turbine Hall and Buildings
- Heat Recovery Steam Generator (HRSG) and cladding
- Emissions stack – 60m high – with continuous emissions monitoring system (CEMS)
- Air Cooled Condensers
- Air Intake

Open Cycle Gas Turbine

- OCGT enclosures
- Air Intakes
- Fin Fan Coolers
- Emissions stack – 45m high
- Electrical rooms

Secondary Fuel Storage and Unloading Area

- 2 no. fuel storage tanks
- Unloading layby
- Fuel pumping and cleaning plant
- Fuel forwarding building

Associated Buildings and Infrastructure

- Administration Building
- Workshop
- Control Room
- Stores
- Car Parking
- Maintenance areas
- Ancillary coolers
- Fuel gas performance heating room
- Generator transformer and unit auxiliary transformer
- Abstraction boreholes
- Water treatment plant
- Process water treatment plant
- Wastewater treatment plant
- Raw water storage
- 2 no. demineralised water storage tanks

- Drainage infrastructure
- Water discharge points
- Firewater retention and shutdown facility
- Site access and internal roads
- Security fencing and gates
- Landscaping
- Utilities

Gas AGI Compound

- Regulator building
- Boiler and instrumentation houses
- Gas analyser kiosk
- Pressure reduction system
- Security fencing and gates

Gas Receiving Facility

- Gas compressor building
- Fin fan coolers
- Pressure reducing station

Ancillary Plant and Equipment

- Pipe gantries
- Firefighting systems
- Fire water pumphouse
- Raw water pumphouse
- Chemical storage tanks & pumphouse
- Lube oil storage building
- Emergency diesel generator
- Silencers, vents, drains
- Lighting

Peat and Spoil Deposition Area

- Approx. 225,000 sq. m.
- Not exceeding 1m above ground level
- Suitably profiled to eliminate risk of movement/slippage

Electricity Grid Connection

220 kV Substation

- Switchgear building
- Control room building
- Transformer bays
- 2 no. lattice gantries (c. 20m high) to support overhead line connection
- Telecommunications mast (c. 36m high)
- Security fencing

- Landscaping
- New access on to R400

220kV Overhead Line

- 13 no. double circuit suspension pylon towers (c. 44m high)
- 6 no. strain pylon towers (c. 38m high)

220kV Line-Cable Interface Compound

- Interface tower gantry (c. 20m high)
- Cable sealing ends
- Security fencing

220kV Underground Cable Connection

- With paved and gated service road, and 12 no. joint bays to facilitate construction and servicing

400kV Substation

- 400kV GIS building
- 220kV GIS building
- Transformer compound
- 2 no. lattice gantries (c. 28m high) to support overhead line connection to 2 no. 'loop-in' strain towers (c. 32.5m high) on the Oldstreet-Woodland 400kV line
- Telecommunications mast (c. 36m high)
- Security fencing
- Landscaping
- Access off L1010 road

Peat Deposition Areas

- 2 no. peat depositions areas, one to the north of the 400kV substation (c. 75,300 sq. m.) and one to the south-west of the 220kV substation (c. 50,200 sq. m.)

Tree Replanting Areas

- 5no. areas (c. 17.5 ha.)

3.7 Operation of Proposed Development

3.7.1 The proposed power plant is designed, and will operate in compliance with, the requirements of the European Union (Large Combustion Plants) Regulations 2012 (SI no. 566 of 2012) under its Industrial Emissions Licence (to be applied for).

3.7.2 An IE licence is required for operation of the Power Plant Area in accordance with Activity 2.1 of the First Schedule of the EPA Act, as amended ('Combustion of fuels in installations with a total rated thermal input of 50 MW or more').

3.7.3 Licensing requirements will ensure that the impacts of emissions to air, soil, surface and groundwater, and effects on the environment and human health, will be minimised and avoided where possible.

3.7.4 The operator of the plant will implement and maintain an Environment Management System (EMS) which will be certified to International Standards Organisation (ISO) 14001. The EMS will establish the requirements and procedures required to ensure that the Site is operating to the appropriate standard.

3.7.5 The plant will be started and stopped automatically under the supervision of trained operators in response to requests for power from the electricity grid operator. The plant is specifically designed to start-up, shut-down and ramp (change its output) rapidly in response to the requirements for power from the electricity grid.

3.7.6 The Electricity Grid Connection, upon completion, will be managed by the respective transmission asset operators (TAO) and transmission service operators (TSO) (ESBNI and EirGrid) as part of the national electricity grid.

3.8 Community Benefit

3.8.1 A Community Benefit Fund will be set up for the Proposed Development. The fund shall be made by five annual payments of €90,000 (ninety thousand euro), beginning on commencement of construction of the Proposed Development, contributing to a total fund of €450,000 (four hundred and fifty thousand euro) over a five-year period.

3.8.2 As the project is at an early stage of its development, the exact nature and structure of the Community Benefit Fund, including details of the management and operation of the Fund, is not known at this time. It is envisaged however, that the Community Benefit Fund will operate in a similar manner to other Bord na Móna Community Benefit Fund models currently in operation.

4.0 Policy & Legislative Context

4.1 Introduction

4.1.1 This Section sets out the planning policy and legislative context relevant to the Proposed Development at European, national, regional and local level.

4.1.2 Ireland is in the process of transitioning from a centralised, fossil fuel based power generation network to a more distributed, renewable energy based generation network. To facilitate the continued expansion of Ireland's renewable generation capacity, and support security of supply, modes of supporting the electricity network during periods when there is a gap between renewable power generation and power demand are needed. The Proposed Development is designed for this purpose, providing a combination of flexible mid-merit (CCGT) and peaking plant (OCGT) capacity.

4.1.3 As a responsive power generator, the proposed plant will facilitate the integration of more renewable generation into the electricity network, helping to maintain security of supply and supporting Ireland in its transition to a low carbon economy.

4.1.4 As set out in Section 3.3, this type of generation capacity is urgently needed – not just to support the transition to renewables but also given the heightened level of power supply risk currently facing the country.

4.1.5 It is clear across all levels of planning policy that maintaining security of energy supply is a key priority for the coming decade and beyond. The Proposed Development will provide a significant quantum of flexible generation capacity which will help to maintain security of supply while supporting Ireland in its transition to a low carbon economy. Furthermore, it will help to replace generation capacity that will be lost through the planned retirement of ageing, more carbon intensive power stations in the coming years.

4.1.6 The proposed development has been designed to facilitate a sustainable transition to operating off a blend of renewable fuels, such as Hydrogen, over the operational life of the project. In so doing, it is in keeping with plans for the long-term transition from natural gas to hydrogen that are set out within the National Hydrogen Strategy (2023).

4.2 European Energy Policy

4.2.1 Energy policy in Ireland is formulated in the context of 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.

4.2.2 European policy is a key driver of policy and guidance documents at national, regional and local level, which increasingly recognise that achieving significant increases in renewable generation will require major investment in associated systems and technology, such as OCGT and CCGT capacity, to effectively manage and safeguard power supply.

Energy Roadmap 2050

4.2.3 The European Energy Roadmap 2050 (EC, 2011) was published in 2011 and explores the transition of Europe's energy systems so that they are compatible with the greenhouse gas (GHG) reduction targets set out in the Renewable Energy Directive (2009/28/EC), while also increasing competitiveness and security of supply.

4.2.4 The Energy Roadmap has informed national energy policy in the years since its publication, including Ireland's Climate Action Plan, by providing a detailed analysis of the issues involved in transitioning to more sustainable, decarbonised energy systems and carrying out modelling of different approaches.

2030 Climate and Energy Framework (2021)

4.2.5 The EU's '2030 Climate and Energy Framework' sets a legally binding target for EU member states of achieving at least 32% of electricity generation from renewable sources by 2030. The Framework includes EU-wide targets and policy objectives for the period from 2021 to 2030.

4.2.6 Some of the key targets for 2030 under the existing Framework include:

- At least 40% cut in greenhouse gas emissions (from 1990 levels)[38];
- At least 32% share for renewable energy; and
- At least 32.5% improvement in energy efficiency

4.3 National Energy Policy, Legislation and Strategy

Policy & Legislation

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

4.3.1 The Government White Paper (2015) 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.

4.3.2 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

[38] As part of the European Green Deal the Commission has aims to increase this to at least 55% compared to 1990 levels, with legislative proposals for same adopted in 2021.

renewable energy system will need to move away from carbon-intensive fuels such as peat in favour of lower carbon fuels like natural gas. The White Paper notes that:

"Renewable energy will also play a central role in the transition to low carbon energy. 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"[39].

"Onshore wind continues to be the main contributor (18.2% of total generation and 81% of RES-E[40] *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."*[41]

"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"[42].

"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".[43]

4.3.3 The stated aim of the DS3 programme ('Delivering a Secure, Sustainable Electricity System') is to *"meet the challenges of operating the electricity system in a secure manner while achieving the 2020 renewable electricity targets"*[44]. It was initiated in 2011 and remains ongoing, with new targets established for 2030. The Proposed Development will provide responsive generation capacity to Eirgrid in line with the DS3 Programme. It will help to ensure that the grid can continue to operate efficiently with the integration of variable renewable energy sources.

Climate Action and Low Carbon Development (Amendment) Act 2021

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

4.3.5 A more ambitious target has now been committed to in law through the Climate Action and Low Carbon Development (Amendment) Act 2021. This Act (2021) 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 a 51% reduction in greenhouse gas emissions by 2030, relative to a baseline of 2018. The Act establishes a 2050 net zero emissions target compared to 1990 levels, and introduces a system of successive five-year carbon budgets starting in 2021.

[39] 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, p48)
[40] i.e. Electricity generated from Renewable Energy Sources
[41] Ibid., p53
[42] Ibid., p54
[43] Ibid., p53
[44] The DS3 Programme (Delivering a Secure, Sustainable Electricity System), p2

Climate Action Plan 2024

4.3.6 The Climate Action Plan 2024 (Published on 20 December 2023) sets out a 'roadmap' to achieve a net zero carbon energy system by 2050. Climate Action Plan 2024 (CAP24) seeks to build on the progress made under the previous Climate Action Plan by delivering policies, measures and actions that will support the achievement of our carbon budgets, sectoral emissions ceilings, and 2030 and 2050 climate targets.

4.3.7 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 gas-fired generation capacity is made abundantly clear. The Plan states that '*rapid delivery of flexible gas generation is needed at scale and in a timeframe to replace emissions from coal and oil generation as soon as possible to reduce impact on the carbon budget*[45].

4.3.8 Key targets identified for the energy sector under CAP24 include the delivery of at least 2 GWs of new flexible gas-fired generation by 2030[46].

Policy Statement on Security of Electricity Supply (2021)

4.3.9 The Government's Policy Statement on Security of Electricity Supply (November 2021) set out a number of updates to national energy policy in the context of 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. The policy statement includes explicit Government approval 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[47].

National Energy Security Framework (2022)

4.3.10 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. It recognises that the level of dispatchable electricity generation capacity needs to increase significantly over the coming years in order to reliably meet the expected demand for electricity.

National Hydrogen Strategy (2023)

4.3.11 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.

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

[45] CAP24, p153
[46] Ibid., p147
[47] Policy Statement on Security of Electricity Supply 2021, p5.

- 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.

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

4.3.14 In a similar vein, the *Draft National Biomethane Strategy*, which was published for consultation on the 30th of January 2024, emphasises the potential for biomethane to contribute significantly to gas supply, with increasing percentages being introduced to the transmission network over time.

Energy Security in Ireland to 2030 – Energy Security Package

4.3.15 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.

4.3.16 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

4.3.17 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".*

Sectoral Strategy

Shaping our Electricity Future – A Roadmap to Achieve Renewable Ambition

4.3.18 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 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.

4.3.19 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"*[48].

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

4.3.20 Eirgrid Group's statement of purpose is to 'Transform the power system for future generations'. The 'Strategy 2020-50' document sets out its strategy for achieving this and the challenges that go with it. "*The electricity system will carry more power than ever before and most of that power will be from renewable sources*[49]". The necessary changes will be significant and will need to be managed in a co-ordinated and cost-effective way.

4.3.21 The strategy 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 to the infrastructure to make the grid stronger and more flexible*[50]".

4.3.22 This increased strength and flexibility 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.

Delivering a Secure Sustainable Electricity System (DS3 Programme)

4.3.23 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.

4.3.24 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.

4.3.25 The 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.

4.3.26 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.

Tomorrow's Energy Scenarios' - 2023 Consultation Report

[48] Eirgrid/SONI (2023), Shaping our Electricity Future Roadmap version 1.1 (Page 66)
[49] Eirgrid Group -Strategy 2020-50: Transform the Power System for Future Generations, p4
[50] Ibid., p10

4.3.27 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 presented 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 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.

4.3.28 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.

Ten Year Generation Capacity Statement 2023-2032

4.3.29 The latest all-Ireland Generation Capacity Statement, published by Eirgrid/SONI in January 2024, warns 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"*[51].

4.3.30 It predicts capacity deficits during the 10 years to 2032 and states that *"further new electricity generation will be required to secure the transition to high levels of renewable electricity over the coming decades"*. It is clear that this must include new gas-fired generation capacity: *"A balanced portfolio of new capacity is required and this includes the need for new cleaner gas fired generation plant"*[52].

4.3.31 It recognises that this 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"*[53].

4.3.32 The Statement notes that the availability of conventional generation remains a serious cause for concern and that most of the predictable capacity that was expected to

[51] Eirgrid/SONI (2024), Ten Year Generation Capacity Statement, p9
[52] Ibid., p10
[53] Ibid., p10

come online over the coming years has now been withdrawn. It states that '*since 2018, less than 30 MW of new gas capacity has been delivered with 410 MW of new gas capacity terminating their contracts*[54]'.

4.3.33 It notes that the balanced portfolio of new capacity that must be delivered should include both OCGT *and* CCGT generation technology: *"It is crucial that a balanced portfolio of new capacity is delivered, such as long duration storage, interconnection, demand side and renewable-ready open cycle and combined cycle gas turbines"*[55].

4.4 National Planning Policy

National Planning Framework & National Development Plan

4.4.1 '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.

4.4.2 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."[56]

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

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

4.4.4 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. For instance, the National Strategic Outcomes relating to supporting and strengthening the economy (Outcomes 3, 6 and 8), providing access to quality public services (Outcomes 4, 7 and 10) and achieving sustainable growth of settlements and management of environmental resources (Outcomes 1 and 9), are not achievable in the absence of a secure and reliable electricity supply.

[54] Ibid., p77
[55] Ibid., p29
[56] Project Ireland 2040 – National Planning Framework, DHPLG, February 2018

4.4.5 Notably, National Strategic Outcome 8 (Transition to Sustainable Energy) states 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 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."*[57]

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

- **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.*

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

4.4.8 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 strategic development projects such as that proposed, emphasising the need for investment in ongoing capacity renewal and future technology that affords Ireland the opportunity to comprehensively decarbonise energy generation.

4.4.9 The NDP was updated in October 2021 (The National Development Plan 2021-2030). The updated NDP's 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.'*[58]

4.4.10 It emphasises that '*ensuring continued security of energy supply is considered a priority at national level and within the overarching EU policy framework* '[59].

4.4.11 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.

[57] Government of Ireland, (2018). National Planning Framework. Project Ireland 2040 p147.
[58] Department of Public Expenditure and Reform, (2021). National Development Plan 2021-2030 p126
[59] Ibid., p125

4.4.12 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'*[60].

4.5 Regional Planning Policy

Eastern & Midland Regional Assembly: Regional Spatial and Economic Strategy 2019 - 2031

4.5.1 The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland region was adopted in 2019 and provides a high-level development framework for the region that supports the implementation of the NPF.

4.5.2 The Strategy recognises the importance of secure energy supply and states that '*a secure and resilient supply of energy is critical to a well-functioning region, being relied upon for heating, cooling and to fuel transport, power industry and generate electricity. With projected increases in population and economic growth, the demand for energy is set to increase in the coming years'*[61].

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

- **RPO 10.19**: *Support the roll-out of the Smart Grids and Smart Cities Action Plan enabling new connections, grid balancing, energy management and micro grid development*[62].
- **RPO 10.20**: *Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy. This Includes the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity and gas transmission grid*[63].
- **RPO 10.22**: *Support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission/ distribution of a renewable energy focused generation across the major demand centres to support an island population of 8 million people.*

4.5.4 The Proposed Development complies with Regional Policy objectives. It will help provide security of energy supply and the integration of more renewable generation into the network while supporting Ireland in its transition to a low carbon economy.

[60] Ibid., p125
[61] Ibid., p224
[62] Ibid,. p23
[63] Ibid., p23

4.6 Local Planning Policy

4.6.1 The local planning policy context is contained within the Offaly County Development Plan (CDP) 2021 – 2027.

4.6.2 In considering local policy compliance, it should be noted that An Bord Pleanála granted SID permission in April 2010 for the construction of a 600MW power plant on the 'Derrygreenagh Works' site[64]. In 2019, a 5-year extension to this permission was granted by Offaly County Council, extending the life of the planning consent to 2025. The acceptability in principle of the Proposed Development against local planning considerations has been established for some time.

Offaly County Development Plan 2021 -2027

4.6.3 The Offaly CDP emphasises the importance of achieving the transition to a low carbon economy and reducing dependency of fossil fuels.

4.6.4 Chapter 3 (Climate Action and Energy) seeks to '*achieve a transition to an economically competitive, low carbon climate resilient and environmentally sustainable county'*.

4.6.5 Specific policies relating to Energy development include the following:

- **CAEP-01 -** *Support and facilitate the development, reinforcement, renewal and expansion of the electricity transmission and distribution grid, including the development of new lines, pylons and substations as required to provide for the future physical and economic development of Offaly*[65].
- **CAEP-04 –** *Support EirGrid's Implementation Plan 2017 – 2022 and Transmission Development Plan 2019 and any subsequent plans prepared during the plan period that facilitate the timely delivery of major investment projects subject to appropriate environmental assessment and the outcome of the planning process*[66].
- **CAEP-05** - *Support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission/ distribution of a renewable energy focused generation across the major demand centres*[67].
- **CAEO-09** - *Support the further extension of the gas grid into County Offaly to serve existing and envisaged future residential, commercial and industrial development*[68].
- **CAEP-11** - *Support the transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050, by way of reducing*

[64] ABP Ref. 19.PA0011
[65] Offaly County Development Plan (2021-2027), Chapter 3 Climate Action and Energy, 3.8 Climate Action Energy Policies, p90.
[66] Ibid, p90
[67] Ibid, p90
[68] Ibid., p102.

greenhouse gases, increasing renewable energy, and improving energy efficiency[69].

4.6.6 Chapter 3 of the Plan also identifies how peatlands can facilitate new energy proposals and therefore support diversification of energy production and help the transition to a low carbon economy.

4.6.7 **CAEP-13 - Peatlands** - *The Council recognises that the industrial peatlands in the midlands are a significant resource will transition to after uses ranging from amenity, tourism, biodiversity services, 'wild areas', flood management, climate mitigation, energy development, industry, education, conservation and many more*[70].

4.6.8 In considering the economic development of the county, Chapter 5 of the Plan notes that the *"Council acknowledges and is in favour of the re-development and/or expansion of currently used and disused sites such as….Bord na Móna works"*[71].

4.6.9 It also recognises that the energy sector, *"both renewable and non-renewable, is currently a significant employer in the county and has potential for considerable growth over the lifetime of this plan"*[72].

4.6.10 Policy **ENTP-24** states that *"It is Council policy to actively encourage the redevelopment of sites with antecedent uses or disused sites which were formerly ESB plants and Bord na Móna works for enterprise and employment creation"*.

[69] Ibid., p91
[70] Ibid., p92.
[71] Ibid, p184
[72] Ibid, p186

5.0 Environmental Impact

5.1 Need for EIAR

5.1.1 An EIAR has been prepared 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 the planning authority with the environmental information that must be considered when determining the Application.

5.1.2 The following topic areas are covered in the EIAR:

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

5.1.3 A brief summary of the assessment for each topic area is provided in sections 5.2 – 5.16 below. The overall conclusion of the EIAR is presented in section 5.17. 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 5.18.

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 headline findings are summarised below:

- No specific additional mitigation has been identified as necessary for the construction phase of the Proposed Development and Overall Project. No significant effects have been identified.

- An air quality dispersion modelling assessment was carried out to evaluate the impact on local air quality of the operation of the Power Plant Area. It concluded that there would be a small increase in ground-level concentrations of nitrogen dioxide (NO_2) and carbon monoxide (CO), and that operational concentrations of the modelled pollutants would be well within current Environmental Standards.
- The Power Plant Area will comply with the requirements of the European Union (Large Combustion Plants) Regulations 2012 S. I. No. 566 of 2012 under an IE Licence (which is to be applied for) so that any impacts of emissions to air, soil, surface and groundwater, and effects on the environment and human health, will be minimised and avoided where possible.
- The air quality assessment of impacts at the opening of the Power Plant Area has assumed that the ELVs will be met for the operational Power Plant as required by, and in accordance with, the use of Best Available Techniques (BAT) under the EPA's environmental permitting regime.
- The emissions to air from the operation of the Electricity Grid Connection would be minimal and have been classified as 'Negligible'.
- Therefore, air quality effects for the operational phase of the Proposed Development will be 'Not Significant' and, other than embedded mitigation measures outlined in EIAR Chapter 7, no specific additional mitigation has been identified as necessary.

5.3 Cultural Heritage and Archaeology

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 **EIAR Chapter 8**. The headline findings are summarised below:

Power Plant Area

- There are no heritage assets recorded within the boundaries of the Power Plant Area, however there are 19 recorded archaeological assets recorded within the 1km study area, in the surrounding commercially cut peat bogs.
- While there are no known Cultural Heritage assets within the Power Plant Area and the majority of the Site has been severely disturbed by previous development, there is potential for currently unrecorded archaeological remains to be present. These are likely to be of local interest and low heritage value.
- Groundworks within the Power Plant Area would severely impact upon any archaeological remains. Mitigation has been proposed to determine the presence/ absence of such features and preserve them by record during the construction phase.
- There is no likelihood of negative impacts caused by changes to the setting of identified designated assets by noise, dust, vibration, and visual intrusion, from temporary, construction-related activities due to the distance between these assets and the Power Plant Area.

- Significant effects for the operation phase derive from changes to the setting of heritage assets. These largely mirror the construction phase effects.

Electricity Grid Connection

- There are no heritage assets recorded within the boundaries of the Electricity Grid Connection, however there are 108 assets recorded within the 1km study area, the majority of which are located within the surrounding commercially cut peat bogs.
- Construction phase effects on unrecorded archaeological assets are assessed to be 'Moderate', 'Negative', and 'Permanent'.
- Construction of the Overhead Power Line will impact the special interests and qualities of the National Monument Barrow (NM. 532) and a 'bowl barrow' (OF010-004001). This will not change with mitigation and the effect is therefore assessed to be 'Moderate' for the National Monument Barrow (NM. 532), 'Slight' for the bowl barrow (OF010-004001), and 'Adverse' and 'Long-Term Reversible' for both assets.

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 **EIAR Chapter 9**. The headline findings are summarised below:

Power Plant Area

- A number of effects on biodiversity assets associated with the construction phase of the Power Plant Area were identified, ranging from 'Slight' to 'Significant' in terms of significance, 'Short-Term' to 'Permanent' in terms of duration, and 'Local' to 'International' in terms of geographic scale.
- Most of the effects identified for the operational phase are 'Slight' to 'Imperceptible' but others are 'Moderate' or 'Significant'. Most are 'Permanent' in duration, and all are 'Local' in terms of geographic scale.
- With the implementation of mitigation measures presented in EIAR Chapter 9, residual effects for the Power Plant Area will largely be 'Imperceptible' or 'Not Significant', with the exception of the following ecological constraints:
    - Residual effects on bats will remain 'Permanent', 'Negative', and 'Slight', and 'Local' in scale. They are associated with the loss of bat roosts during construction and disturbance to retained and new bats roosts during operation.
    - Residual effects on smooth newt and common frog from habitat loss and fragmentation, disturbance, injury, or mortality as a result of construction activities for the Power Plant Area will be 'Short-Term' but result in

'Negative' and 'Slight' effects to populations of these species at the 'Local' geographic scale.

Electricity Grid Connection

- Effects from the construction phase of the Electricity Grid Connection range from 'Slight' to 'Significant' in terms of significance, 'Short-Term' to 'Permanent' in terms of duration, and 'Local' to 'International' in terms of geographic scale.
- Most of the effects identified for the operational phase are 'Slight' to 'Imperceptible', but others are 'Moderate' or 'Significant'. Most are 'Permanent' in duration, and all are 'Local' in terms of geographic scale.
- With the implementation of mitigation measures, residual effects for the Electricity Grid Connection will largely be 'Imperceptible' or 'Not Significant', with the exception of the following ecological constraints:
    - Despite the implementation of mitigation to protect badgers and their setts during construction, the loss of setts and increased human presence and artificial lighting during operation will continue to have a 'Negative' and 'Slight' effect on badger populations at the 'Local' geographic scale.
    - Residual effects on smooth newt and common frog from habitat loss and fragmentation, disturbance, injury, or mortality as a result of construction activities will be 'Short-Term' but result in 'Negative' and 'Slight' effects to populations of these species at the 'Local' geographic scale.
    - Elements of the Electricity Grid Connection might be expected to remain a collision and electrocution risk to both breeding and wintering birds; thus, residual effect will be 'Permanent', 'Negative', 'Slight' at the 'Local' (for Amber-listed species) to 'County' (for Red-listed species) geographic scale.
    - In addition, elements along the Electricity Grid Connection may cause both breeding and wintering birds to be displaced from suitable habitat and could act as a partial barrier to movement. As such, the residual effect will be 'Permanent', 'Negative', and 'Slight' at the 'Local' (for Amber-listed species) to 'County' (for Red-listed species) geographic scale.
    - The Electricity Grid Connection will be managed by the transmission asset operators and transmission service operators (ESBNI and EirGrid) as part of the national grid. Decommissioning activities will be conducted in accordance with the appropriate guidance and legislation at the time of decommissioning.

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 **EIAR Chapter 10**. The headline findings are summarised below:

Power Plant Area

- Construction phase effects on landscape character result from the loss of existing vegetation and habitat; construction activities such as soil stripping, earthworks, grading, etc.; indirect effects to visual amenity as a result of the visibility of construction activities; and the short-term presence of site infrastructure (e.g. site traffic, construction compounds, soil storage areas, etc.).
- The introduction of localised changes to the landform (e.g. the presence of construction plant) will be Temporary to Short-Term, and Reversible.
- Construction will alter a small area within the wider landscape character of County Offaly, but it will not result in the permanent loss of key features.
- Construction phase effects are therefore considered to be Moderate Adverse. Landscape character areas will not be affected.
- During the operational phase, direct and long-term change will occur locally where the Power Plant Area will be physically located as it will introduce a prominent industrial component. Operational phase effects are therefore considered to be Significant Adverse.
- Given the scale and location of the Power Plant Area, landscape mitigation measures focus on architectural mitigation such as façade treatment and minimising lighting during night-time hours. Additional woodland and tree belts are also proposed to integrate the facility into the landscape where possible, although this will not reduce effects on landscape character.
- Construction activity will not be visible to all of the visual receptors due to intervening landform, vegetation, and distance to the site boundary. The presence of construction-specific elements and activity will be Reversible and of Short-Term duration. Therefore, visual effects are considered to be Moderate Adverse.
- During operation, the potential for significant visible plumes from the OCGT development is considered to be very low. The CCGT development will experience occasional plumes but the risk of prolonged visibility is low. However, the Power Plant Area will be visible for approximately 5 km, affecting a number of visual receptors within the study area. The effects will range from 'None' to 'Significant' depending on their distance.
- Residual visual effects from the construction and operational phases will remain largely unchanged despite the implementation of mitigation measures. These effects will be highest in short and middle-distance views from the adjacent road network as well as from areas on higher ground, where there is little intervening existing vegetation.

Electricity Grid Connection

- The construction phase of the Electricity Grid Connection will adversely affect the vegetation and habitat onsite and change sections of the local landscape character within an approximately 1 km radius, intensifying its industrial character (particularly due to the introduction of noticeable vertical elements). Landscape effects during the construction phase are considered to be Temporary, Moderate, and Adverse.
- During the operational phase, Direct and Permanent change will occur locally where the elements of the proposed Electricity Grid Connection will be physically located. This change will include tall vertical elements and ancillary structures, as well as localised changes to landform. Visual effects are therefore considered to be Significant, and Adverse.
- Mitigation measures proposed are similar to those for the Power Plant Area and include proposed bands of woodland and clusters of deciduous trees in the vicinity of the substation compounds, where feasible, in order to integrate the substation structures into the surrounding setting.
- Visual amenity within an approximately 1 km radius of the Electricity Grid Connection corridor will be altered during the construction phase due to the introduction of prominent new vertical elements and construction plant and works. Sensitive features such as retained field boundaries and hedgerows will be protected along construction corridors and access tracks.
- Construction phase changes will be Temporary to Short-term and largely Reversible.
- Construction will alter a wide area at a local level, potentially resulting in permanent loss of key features such as trees and hedgerows along the construction corridor. The changes to the landscape character will be noticeable within 1 km of the corridor and up to approximately 5.5 km in elevated areas to the southwest, including Croghan Hill.
- During the operational phase, the Electricity Grid Connection will alter visual amenity within approximately 1 km radius from its boundary. The introduction of tall vertical features will result in changes to the visual amenity locally but also be noticeable beyond 1 km in the wider study area.
- Residual visual effects in close and middle-distance views (up to 1km) along the R400 will reduce slightly due to the implementation of additional screen planting along the substation compound boundaries.
- Middle and long-distance views (beyond 1km) from the Electricity Grid Connection and from elevated locations, such as Croghan Hill or Knockdrin Hill, will remain unchanged.

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 **EIAR Chapter 11**. The headline findings are summarised below:

Power Plant Area

- Predicted construction noise levels for the estimated noisiest period of construction are below the weekday daytime and Saturday morning assessment criteria (i.e. 70 dB during the weekday daytime, and 65 dB on Saturday). With the implementation of mitigation measures (including the CEMP), noise impacts on residential receptor positions generated by on-site activities are assessed to be 'Not Significant'.
- Public roads R400 and L1010 will be used by construction traffic. A 'Negligible' impact on existing road traffic noise levels is expected during the construction phase at residential receptor positions. The effect of the Power Plant Area construction vehicles utilising local roads would be defined as 'Imperceptible', 'Short-Term', and 'Reversible'.
- The effects of construction noise and vibration, and construction traffic noise will be 'Temporary', only occurring on weekdays and Saturdays.
- During the operational phase, taking into consideration the implementation of mitigation measures recommended of EIAR Chapter 11, operational noise levels of the Power Plant Area are at or below the relevant criteria at all selected receptors. Therefore, the effects are assessed to be 'Not Significant'.
- Effects arising from the process of decommissioning of the Power Plant Area are likely to be of a similar or lesser nature and duration to those arising from the construction phase. As decommissioning works are temporary in nature, noise effects are determined to be 'Not Significant'.

Electricity Grid Connection

- Predicted construction noise levels for the estimated noisiest period of construction are below the weekday daytime and Saturday morning assessment criteria. In addition, the use of construction noise mitigation measures will help control levels so that the predicted noise levels at all Noise Sensitive Receptors (NSRs) are below the relevant assessment criteria during construction. The residual noise effects of the construction phase are determined to be 'Not Significant' and 'Short-Term'.
- Predicted operational noise levels relating to the Electricity Grid Connection have been shown to be compliant with the relevant operational assessment criteria. No specific noise mitigation measures are required as part of the Electricity Grid Connection operation, and the residual effects of noise from the operation phase are assessed to be 'Not Significant', 'Permanent' and 'Reversible'.

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 **EIAR Chapter 12**. The headline findings are summarised below:

Power Plant Area

- During the construction phase, the following impacts on the Water Environment have the potential to occur:
  - 'Small adverse', 'Direct', and 'Temporary' impacts on water quality due to uncontrolled site runoff, resulting in 'Slight' to 'Moderate' effects. Receptors affected may include the Mongagh River and the Knockdrin Garr Cutover (including Drumman Bog) and Bunsallagh Cutover complexes (including Derryarkin Bog).
  - 'Small adverse', 'Direct', and 'Temporary' impacts on surface and groundwater water quality due to accidental spillage of oils, fuels, or other construction chemicals/ wastewater, resulting in 'Slight' to 'Moderate' effects. Receptors affected may include the Mongagh River, the Knockdrin Garr Cutover and Bunsallagh Cutover complexes, one onsite and one offsite well, and the Athboy groundwater body.
  - **'**Negligible' to 'Small adverse', 'Direct', and 'Temporary' impacts on surface and groundwater water flows, levels, and resource availability to onsite and offsite groundwater abstractions and Groundwater dependent terrestrial ecosystems (GWDTEs)), due to dewatering of excavations, altered drainage regimes and discharging of abstracted water. These would result in 'Imperceptible' to 'Slight' effects. Receptors affected may include the Knockdrin Garr Cutover and Bunsallagh Cutover complexes, and the Athboy groundwater body.
  - **'**Small adverse', 'Direct', and 'Temporary' impacts on the geomorphology of watercourses, due to construction activities, resulting in 'Slight' to 'Moderate' effects on the Mongagh River.
  - **'**Negligible', 'Direct', and 'Temporary' impacts to flood risk status and site drainage by uncontrolled site runoff or by construction within areas at risk of flooding, resulting in 'Imperceptible' effects on the Mongagh River.
- During the operational phase, the following Water Environment impacts have the potential to occur.
  - 'Negligible', 'Direct', and 'Long-Term' impacts on surface water quality in receiving waterbodies as a result of proposed discharges, resulting in 'Imperceptible' effects on the Mongagh and Yellow rivers.
  - **'**Small adverse', 'Direct', and 'Long-Term' impacts on surface and groundwater water quality due to accidental spillages, resulting in 'Slight' to 'Moderate' effects on the Mongagh and Yellow rivers, and the Athboy groundwater body.
  - **'**Small adverse', 'Direct', and 'Temporary' impacts on the geomorphology of watercourses due to new drainage outfalls or other structures that may be installed or removed, resulting in 'Slight' to 'Moderate' effects on the Mongagh and Yellow rivers.
  - **'**Negligible' to 'Small adverse', 'Direct', and 'Long-Term' impacts on groundwater levels and resource availability due to increased groundwater

abstraction, resulting in 'Imperceptible' to 'Slight' effects. Receptors affected may include the Knockdrin Garr Cutover and Bunsallagh Cutover complexes, and the Athboy groundwater body.

  - **'**Negligible', 'Direct', and 'Long-Term' impacts to flood risk status by increased volume and rate of surface water runoff from new impervious areas, resulting in 'Imperceptible' effects on the Mongagh River.

- Effects arising from the process of decommissioning of the Power Plant Area are considered to be of a similar nature and duration to those arising from the construction phase.
- With the implementation of mitigation measures outlined in Chapter 12 (including implementation of the CEMP), residual impacts for the Power Plant Area are considered to be 'Imperceptible' and therefore 'Not Significant'.

Electricity Gird Connection

- Dring the construction phase, the following impacts on the Water Environment have the potential to occur:
  - **'**Small adverse', 'Direct', and 'Temporary' impacts on water quality due to uncontrolled site runoff, resulting in 'Slight' to 'Moderate' effects. Receptors affected may include the Yellow River, the Coolcor Stream, the Grand Canal WFD waterbody, the Bunsallagh Cutover and Ballybeg Cutover complexes, two wells and a borehole, and the Toberdaly Public Water Supply (PWS).
  - **'**Small adverse', 'Direct', and 'Temporary' impacts on surface and groundwater water quality due to accidental spillages, resulting in 'Slight' to 'Moderate' effects. Receptors affected are the same as above.
  - 'Negligible' to 'Small adverse', 'Direct', and 'Temporary' impacts on water levels and flows due to dewatering activities, resulting in 'Imperceptible' to 'Slight' effects to the Athboy and Daingean groundwater bodies, and the Bunsallagh Cutover and Ballybeg Cutover complexes.
  - **'**Negligible', 'Direct', and 'Temporary' impacts to flood risk status and site drainage, resulting in 'Imperceptible' effects on the Mongagh River and Coolcor Stream.
- Again, with the implementation of mitigation measures outlined in Chapter 12 (including implementation of the CEMP), residual impacts for the Electricity Grid Connection are considered to be 'Imperceptible' and therefore 'Not Significant'.

5.8 Soils and Geology

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 **EIAR Chapter 13**. The headline findings are summarised below:

Power Plant Area

- During the construction phase, no impact to, or removal of, agricultural land or soil resources is proposed or envisaged and all works are on unvegetated Made Ground; therefore, there will be 'Negligible' impact in relation to Land and Soils to agricultural lands, which will be of 'Imperceptible' significance.
- Mobilisation of existing ground contamination or introduction of new contamination due to construction activities may give rise to a 'Small Adverse' impact on site soils of 'Slight' significance.
- There are no designated sites on or within 2km of the Power Plant Area. The construction activities are anticipated to give rise to 'Negligible' impacts to soil of 'Imperceptible' significance.
- There is a possibility for exposed or disturbed soil contamination from the Site to run-off into local surface waterbodies (e.g. the Mongagh River and the Yellow River) and their tributaries, or that contaminants could be introduced to the subsurface as a result of spillages and potentially migrate towards, and into, surface water receptors via groundwater pathways.
- With the implementation of mitigation measures as described in EIAR Chapter 12 and Chapter 13, as well as those outlined within the CEMP, and taking into consideration that these surface watercourses are not classified as river drinking water protected areas, that there are no known surface water abstractions from them within 5km of the site, nor are direct works to these surface watercourses required, residual effects from the construction phase of the Power Plant Area are considered to be of 'Imperceptible' significance for all of the waterbodies.
- Similarly, in terms of groundwater impacts, the magnitude of potential impact to groundwater quality through the mobilisation of existing contaminants in soil and the migration of introduced contaminants in soil is likely to be 'Negligible' on a high sensitivity receptor (i.e. Karstified Limestone Bedrock Aquifer) and of 'Imperceptible' significance.
- For impacts on human health, with the implementation of mitigation measures the magnitude of impact on construction workers, off-site residential receptors, and off-site urban/industrial land users is likely to be 'Negligible'. This impact would be of 'Imperceptible' significance.
- During the operational phase, the Power Plant Area will not result in a loss of agricultural land or change in land use classification. However, there is a likelihood that contaminants could be introduced to the subsurface and soil resources as a result of operational phase leakages from fuel and chemical storage areas. This would result in a 'Small Adverse' impact, resulting in a 'Small Adverse' effect on Urban grade land. These effects are considered to be 'Imperceptible'.
- There are no predicted direct or indirect impacts anticipated on off-site human health or Designated Sites during the operational phase of the Power Plant Area.
- During the decommissioning phase, predicted impacts on soils and geological receptors would be similar to those likely to occur during the construction phase (with the exception of the impacts relating to unidentified contamination).

- There are no predicted direct or indirect impacts to Designated Sites anticipated during the decommissioning phase of the Power Plant Area.
- Given the restricted nature of the decommissioning works in comparison to construction, as well as the implementation of best practice, the impact magnitude of introduced contaminants in the subsurface migrating into surface water receptors would be 'Negligible'. These effects are considered to be 'Imperceptible'. Similarly, impacts to groundwater receptors and human health are also anticipated to be 'Negligible' and of 'Imperceptible' significance.

Electricity Grid Connection

- The replacement of natural peat, subsoils and rock with gravels and concrete for the construction of the electricity transmission infrastructure (permanent) will result in a local change in ground conditions within small areas. Overall, this effect is 'Permanent', 'Small Adverse', and of 'Slight' significance.
- There are likely to be minor, localised peat stability issues that will need to be managed during the construction of the Electricity Grid Connection. Following mitigation procedures, the residual impact in relation to peat stability will be a 'Small Adverse' impact of 'Short-Term' duration on a medium sensitivity cut-over peatland receptor, and is therefore of 'Slight' significance.
- All other potential effects on the soil and geological environment associated with the construction phase will be mitigated through measures outlined in EIAR Chapter 13 so that, overall, the residual impacts from these other aspects will be 'Negligible' to 'Small' 'Adverse' impacts of 'Short-Term' duration on medium sensitivity receptors, and therefore of 'Imperceptible' to 'Slight' significance. In addition, construction phase impacts to Designated Sites, surface waters, groundwater, and human health are anticipated to be 'Negligible', resulting in 'Imperceptible' effects.
- During the operational phase, all land and soil impacts of the Electricity Grid Connection are anticipated to be 'Negligible', resulting in 'Imperceptible' effects.

5.9 Traffic

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**. The headline findings of the assessment are summarised below:

Power Plant Area

- During the construction phase, there will be a new access to the Power Plant Area off the R400 regional road. Vehicles may still travel through the existing access for Derrygreenagh Works, although this access will be closed off at a point throughout construction. For a worst-case assessment, all traffic associated with the Proposed Development will be considered to travel through the new access.

- All heavy goods vehicles (HGVs) associated with the Power Plant Area site will be required within the Construction Traffic Management Plan (CTMP) to travel to the site along the R400 from the direction of the M6 motorway. Construction staff parking will be accommodated within the Proposed Development site. The short-term increase in traffic during the construction phase is shown to only have a 'Slight' impact. Taking this into consideration, as well as the implementation of a CTMP (refer to EIAR Appendix 14H), the residual effect is considered 'Not Significant'.
- During the operational phase, vehicle movements will be associated with staff travel. There will be up to 60 staff employed at the site, working across 3 no. 8-hour shifts with a similar workforce for each shift. Due to the variation in working hours, it is expected that the trips associated with staff will be spread throughout the day and will not all arrive and depart in the same hours. In addition, there will be HGV arrivals associated with secondary fuel delivery and additional staff arriving at the site for inspection and maintenance of both the CCGT and OCGT plant. Due to the low traffic generation, no residual effect on traffic is expected to occur.

Electricity Grid Connection

- During construction, access to the 220kV station will be off the R400, to the south of the existing access for Derrygreenagh Works; off L1010 Togher Road for the 400kV station; and a number of different locations for the grid route, including the 220kV access and the local Quarry access off R400.
- The number of trips generated for these elements of the Electricity Grid Connection vary and are detailed in EIAR Chapter 11. However, all predicted impacts will be 'Neutral', 'Slight', and 'Short-Term'. Taking this into consideration, as well as the implementation of the CTMP (refer to EIAR Appendix 14H), residual effects will be 'Not Significant'.
- It is not proposed that the Electricity Grid Connection or substations will be manned, although periodic inspections and maintenance activities will be undertaken by 1 – 2 staff. Due to the low traffic generation, no residual effects are expected.

5.10 Population and Human Health

5.10.1 A robust assessment of the likely population and human health impacts has been undertaken and the findings are presented in **EIAR Chapter 15**. EIAR Chapter 15 identifies the potential population and human health impacts with reference to EIAR Chapter 7: Air Quality and Climate, Chapter 11: Noise and Vibration, Chapter 12: Water Environment and Chapter 13: Soils and Geology. The headline findings are summarised below:

Power Plant Area

- During the construction phase, the Power Plant Area is not anticipated to have a significant effect on the local or regional population and no mitigation measures are required.
- From an economic/socio-economic perspective, the Power Plant Area will provide employment opportunities to the local community and wider region during construction.
- The construction phase of the Power Plant Area is also likely to increase spend in local businesses as persons involved in the project stay locally or purchase goods. Overall, there will be a 'Positive' impact on the local economy and no mitigation measures are required.
- During the operational phase, the Power Plant Area will comply with the requirements of the European Union (Large Combustion Plants) Regulations 2012 S.I. No. 566 of 2012 under its Industrial Emission (IE) Licence (to be applied for) so that any impacts of emissions to air, soil, surface and groundwater, and effects on the environment and human health, will be minimised and avoided where possible.
- A site-specific Health and Safety Plan covering the commissioning and operation of the Power Plant Area will be prepared.
- In addition to the above, the Applicant is committed to a Community Benefit Fund, which will be a positive benefit to local communities.
- At the end of the operating life of the Power Plant Area, a Decommissioning Plan (including a DEMP) will be produced and agreed with EPA as part of the permit surrender process.
- Adherence to the mitigation measures outlined in the EIAR will ensure that there will be no negative residual impacts or effects on Population and Human Health during the construction, operational, or decommissioning phases of the Power Plant Area.

Electricity Grid Connection

- Similar to the Power Plant Area, during the construction phase the Electricity Grid Connection is not anticipated to have a significant effect on the local or regional population, and, overall, will result in a 'Positive' impact on the local economy.
- During the operational phase, the Electricity Grid Connection will be managed by the respective transmission asset operator and transmission service operator (ESBNI and EirGrid) as part of the national grid.
- Adherence to the mitigation measures outlined in the EIAR will ensure that there will be no negative residual impacts or effects on Population and Human Health during the construction and operational phases of the Electricity Grid Connection.

5.12 Material Assets

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

Power Plant Area

- No significant impacts on land use and built services or waste management were identified for the construction phase, with 'Moderate' being the highest magnitude of impact identified.
- Demolition and construction phase mitigation measures include avoidance, reduction, and remedy measures to reduce or eliminate any significant adverse impacts identified.
- A CEMP has been prepared (refer to EIAR Volume II Appendix 5A) and will be finalised by the contractor prior to commencement of the works.
- Following the implementation of mitigation measures, residual effects on land use and utilities are expected to be 'Unlikely', 'Brief', 'Slight', and 'Negative', while effects of waste and resource management will be 'Imperceptible', 'Short-term', and 'Negative'.
- Without mitigation measures, during the operational phase, the potential for 'Negative' and 'Significant' impacts on land use, telecommunications, and the local and regional environment (associated with improper, or a lack of, waste management) have been identified. 'Positive' and 'Significant' impacts were identified for electricity and gas supply.
- The implementation of mitigation measures outlined EIAR Chapter 16 will ensure that mobile and wireless communications links to the north of the Power Plant are maintained. Following implementation of the mitigation, there will be an 'Imperceptible', 'Short-term', and 'Negative' residual effect on telecoms; all other material assets will have an 'Imperceptible', 'Long-term', and 'Positive' residual effect.
- Similarly, there will be an 'Imperceptible', 'Long-term', and 'Neutral' residual effect on waste services during the operational phase.
- At the end of its operating life, all above-ground equipment associated with the Power Plant Area will be decommissioned and removed from the Site.
- Site environmental liability risk assessment (ELRA) will be prepared for IE licence application for the Power Plant Area and reviewed in accordance with requirements regarding control of risk in the operational phase that may subsequently impact closure. Closure will typically include a requirement for removal of soils, buildings, plant and equipment, and remedial actions would be undertaken under a Decommissioning Management Plan as part of a Closure, Restoration and Management Plan (CRAMP). Residual effects to land use during the decommissioning phase will be 'Imperceptible' and there are no anticipated residual effects to utilities and services in the area.

Electricity Grid Connection

- Without mitigation measures, there will be a 'Negative', 'Significant', and 'Short-term' impact on land use and electricity supply during the construction phase of the Electricity Grid Connection. However, after implementing the measures outlined in EIAR Chapter 16, residual effects on land use, utilities and waste services will be 'Not Significant', 'Negative', and 'Short-Term'.
- During the operational phase, a 'Negative' and 'Significant' impact on land use, and a 'Positive' and 'Significant' impact on the electricity supply were identified. Following implementation of the mitigation measures, residual effects on land use and utilities will be 'Not Significant', 'Negative', and 'Short-Term', and 'Negligible' on waste services.

5.13 Major Accidents and Disasters

5.13.1 A robust assessment of major accidents and disasters risk has been undertaken in the EIAR and the findings are presented in **EIAR Chapter 17** and associated appendices. The headline findings are summarised below:

- The assessment of major accidents and disasters risk associated with the elements and activities of the Proposed Development has taken into consideration:
  - Hazardous substances, including flammable substances, materials harmful to the environment and materials harmful to human health, as well as their quantities and storage arrangements;
  - Electrical hazards;
  - General construction activities, e.g. ground preparation, excavation, construction of buildings and process structures;
  - Natural hazards such as major storms, strong seismic events, and climate change;
  - Identification of Potential Risk Events ('PRE');
  - Assessment of Credible Risk Events ('CRE').
- The CRE identified relate to flood events, peat fires, and accidental releases or leaks of hazardous substances which could result in a fire or explosion (e.g. natural gas or liquefied petroleum gas/propane).
- Taking into account mitigation measures already in place (i.e. embedded within the design), best practice operating procedures, and emergency response policies (such as the implementation of a Site Emergency Response Plan (ERP)), no likely significant effects were identified, and no additional mitigation measures are proposed. The effects of major accidents and disasters risk are therefore 'Not Significant'.

5.13.2 In addition to Chapter 17 of the EIAR a COMAH land use planning assessment of the Proposed Development has been prepared and is included at **EIAR Appendix 17A**. The purpose of the assessment is to examine the development in the context of the Health

and Safety Authority's COMAH land use planning guidance. The report concludes that the Proposed Development would satisfy the risk-based criteria that are set out in the HSA's land use planning guidance.

5.14 Climate

5.14.1 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 and the findings are presented in **EIAR Chapter 18**. The headline findings are summarised below:

Climate Change Risk Assessment

- The Climate Change Risk (CCR) assessment identified nine risks for the Power Plant Area (four related to construction and five related to operation) and eight risks for the Electricity Grid Connection (four related to construction and four related to operation). After considering embedded mitigation measures, all CCRs are classified as 'Low' for all components of the Proposed Development, and their effects are therefore deemed 'Not Significant'.

Greenhouse Gas Assessment

Power Plant Area

- The Greenhouse Gas (GHG) emissions associated with the construction of the Power Plant Area are estimated to be 42,180 metric tonnes in carbon dioxide equivalent (tCO_2e). These effects are mitigated by good practice measures and deemed 'Minor Adverse' and, therefore, 'Not Significant'.
- During the operational phase, GHG emissions associated with the Power Plant Area are partially mitigated by embedded mitigation measures. Taking this into account, under normal operating conditions, GHG emissions are estimated to be 34,846,324tCO_2e over its (at least) 25-year life or 1,393,853tCO_2e annually.
- In the emergency case where the plant switches to distillate as its main fuel source, maximum emissions can be higher, with annual emissions equating to 3,888,823tCO_2e.
- The plant will continue to operate beyond 2050 and therefore falls short of fully contributing to Ireland's net zero trajectory.
- When viewed in isolation, GHG effects of the Power Plant area can be classified as 'Moderate Averse' and therefore 'Significant'.
- The Power Plant Area will make a significant contribution to the electricity supply system at times of peak demand, which would contribute to providing a secure energy supply to the national grid. A key component of Ireland's decarbonisation strategy is to target 80% renewable electricity generation by 2030, with no generation from peat and coal. Solar and wind power generation is variable, depending on local weather conditions; thus, to enable this uptake of renewable energy to happen, it is necessary to have in place sources of energy generation that can be efficiently dispatched to cover any imbalances in supply and demand.

- As the use of coal and peat for electricity generation is reduced, natural gas has been identified as a lower-carbon option to provide security of supply.
- It is reasonable, therefore, to view the Power Plant Area not as an isolated, standalone piece of generating capacity but as an element within an interconnected system that will be part of a wider move to replace existing, unabated high-carbon electricity generation installations.
- In addition, the Power Plant has been designed with the capability to run on hydrogen blend fuels, should this become a feasible fuel option in future. This makes the Power Plant adaptable to a low-carbon fuel source in line with Ireland's net-zero trajectory.
- Therefore, when viewed in a broader context, the GHG effects of the Power Plant Area during the operational phase can be said to be 'Minor Adverse' and therefore 'Not Significant', as it complies with existing and emerging policy requirements and is in line with Ireland's trajectory towards net zero.
- Decommissioning activities for the Power Plant will emit GHGs, but these are expected to be significantly less than those calculated for the construction phase given the shorter duration of the works. Therefore, GHG effects of the decommissioning phase are deemed 'Minor Adverse' and therefore 'Not Significant'.

Electricity Grid Connection

- The GHG emissions associated with the construction of the Electricity Grid Connection are estimated to be 13,306tCO_2e. Once operational, the Electricity Grid Connection will be limited to intermittent maintenance and monitoring activities and therefore will not result in material operational emissions. As a result, operational emissions from the Electricity Grid Connection are deemed immaterial for the purposes of this assessment.

5.15 Cumulative Effects and Interactions

5.15.1 Other proposed developments that are likely to be constructed and operated in the future, and that have the likelihood to generate cumulative environmental effects together with the Proposed Development, have been identified and are presented within the EIAR. The interaction of effects from the Proposed Development and Overall Project in respect of each of the environmental factors listed in the EIA Directive have been identified and addressed in detail in the respective chapters of the EIAR and are summarised in **EIAR Chapter 19**.

5.15.2 Interactions of effects from the Proposed Development are identified between the following environmental aspects:

- Population and Human Health
- Biodiversity
- Land and Soils

- Water
- Air Quality
- Climate
- Noise and Vibration
- Material Assets
- Cultural Heritage
- Landscape and Visual
- Traffic and Transport
- Waste Management
- Major Accidents and Disasters.

5.15.3 All potential effects arising from the interactions were identified early in the design process and in preparation of the EIAR and were therefore addressed in the design of the Proposed Development, in addition to the impact assessment process.

5.15.4 Any potential effects were either avoided through design measures or have been addressed through specific mitigation and monitoring measures within respective chapters of the EIAR.

5.16 Mitigation Measures

5.16.1 As described throughout each of the EIAR chapters, there are instances where the environmental effects associated with the Proposed Development may be of a magnitude as to warrant mitigation measures.

5.16.2 These measures are deemed necessary to minimise environmental impacts during the operation, construction and/or maintenance phases of the Proposed Development.

15.16.3 A single 'Schedule of Environmental Commitments' is included in **EIAR Chapter 20,** which provides a collective summary of the mitigation measures for the Proposed Development. The embedded environmental controls and all mitigation measures detailed therein are also included in the CEMP (refer to EIAR Appendix 5A).

5.17 EIA Conclusion

5.17.1 The Proposed Development has been subject to a comprehensive EIA which concludes that it will have no significant residual effect. 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.

5.18 Appropriate Assessment

5.18.1 An Appropriate Assessment Screening Report was prepared to assist the planning authority in determining whether the Proposed Development will have 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).

5.18.2 Eight European sites were determined to lie within the potential 'Zone of Influence' (ZoI) of the Proposed Development: Lough Ennell SAC, Lough Ennell SPA, Raheenmore Bog SAC, Split Hills and Long Hill Esker SAC, Mount Hevey Bog SAC, Wooddown Bog SAC, River Boyne and River Blackwater SAC, and River Boyne and River Blackwater SPA.

5.18.3 Potential impact on the sites was assessed in relation to several impact pathways, including loss of functionally linked habitat, water pollution, air pollution, hydrology, noise and visual disturbance, spread of invasive non-native species and collision mortality.

5.18.4 Upon review of scientific evidence, likely significant effects were excluded for most identified impact pathways. It was determined however, that Stage 2 Appropriate Assessment was required with regard to the following impact sources:

- Water quality impacts in the construction and decommissioning phases (Power Plant Area and Electricity Grid Connection)
- Spread of non-invasive species during the construction and decommissioning phases (Power Plant Area and Electricity Grid Connection)
- Visual and noise disturbance in the construction and decommissioning phases (Electricity Grid Connection)
- Water quality impacts during the operational phase (Power Plant Area)
- Collision with powerlines during the operational phase (Electricity Grid Connection)

5.18.5 Regarding the River Boyne and River Blackwater SAC and SPA, the NIS identified that construction / decommissioning works in the Power Plant Area and Electricity Grid Connection, and the operational phase of the Power Plant Area, could lead to negative impacts on water quality, particularly in functionally linked stretches of connecting waterbodies in proximity to the Proposed Development.

5.18.6 However, the detailed CEMP accompanying the planning application sets out an extensive list of mitigation measures that will be deployed to safeguard the water environment, including a Pollution Prevention Plan.

5.18.7 Given that adequate protection measures will be adopted, it is concluded that the Proposed Development (with other plans and projects) will not result in adverse

effects on the integrity of the River Boyne and River Blackwater SAC and SPA regarding water quality in view of their conservation objectives.

5.18.6 During construction / decommissioning works in the Power Plant Area and Electricity Grid Connection, the spread of non-native invasive species was screened into the Stage 2 Appropriate Assessment. However, since the Proposed Development incorporates a range of mitigation measures that will help to avoid or minimise any potential for the spread of invasive non-native species, outlined in the CEMP, it is concluded that the Proposed Development (with other plans and projects) will not result in adverse effects on the integrity of the River Boyne and River Blackwater SAC and SPA in the view of their conservation objectives.

5.18.7 Also, regarding the River Boyne and River Blackwater SAC, it was established that construction / decommissioning works in the Power Plant Area and Electricity Grid Connection may result in visual and noise disturbance to roaming and foraging otter given the proximity of the works to hydrologically linked watercourses with evidence of otter.

5.18.8 While only two field signs of otter were recorded in baseline ecology surveys covering watercourses traversed by the Electricity Grid Connection, it is assumed as a precautionary measure that all local watercourses may be functionally linked to the SAC.

5.18.9 A range of measures secured in the CEMP are considered to adequately mitigate disturbance impacts to otter, including the restriction of works to daylight hours, minimal / directional lighting and adequate securing of drainage ducts and excavations.

5.18.10 Overall, provided that the above protection measures are implemented, it is concluded that the Proposed Development (with other plans and projects) will not result in adverse effects on the integrity of the River Boyne and River Blackwater SAC regarding visual and noise disturbance to otter in the view of its conservation objectives.

5.18.11 The potential for the operational phase of the Electricity Grid Connection to result in collision mortality, loss of foraging habitat and disturbance of SCI species in the Lough Ennell SPA was also assessed in the NIS.

5.18.12 Peak counts of 77 and 68 tufted duck were recorded in Derryarkin Bog in non-breeding bird surveys. Due to the distance between the Electricity Grid Connection and the SPA (more than 10km), it can be concluded that the recorded tufted duck at Derryarkin Bog do not form part of the qualifying assemblage of the SPA. No flight heights for tufted duck (a qualifying SCI) were recorded in the vantage point surveys undertaken. However, the proposed pylon height of c. 45m falls within the recorded range of flight heights reported for many other surveyed birds (25-175m). As a standard measure, marker devices will therefore be fitted to the powerline to minimise the risk of bird strike (including that of SCI species).

5.18.13 Given that birds using the area around the Proposed Development are unlikely to be part of the SPA assemblage and additional precautionary mitigation in the form of bird flight diverters will be delivered, it is concluded that the Proposed Development

(with other plans and projects) will not result in adverse effects on the integrity of the Lough Ennell SPA regarding collision mortality, in view of its conservation objectives.

5.18.14 Considering the conclusions reached about each of the European sites screened into the NIS, it can be concluded that, overall, following implementation of mitigation measures the Proposed Development will have no adverse impact on the integrity of any European sites, either alone or in-combination with other plans or projects.

6.0 Planning Assessment

6.1 Compliance with National Policy

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 plant will complement intermittent renewable sources of power (such as wind) by generating flexible, dispatchable power for periods when there is insufficient renewable capacity to meet demand.

6.1.2 In doing so, it will help to reinforce the transmission network to facilitate the 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, it will contribute to the Climate Action Plan's aim for at least 80% of electricity supply in Ireland 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.

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, as set out in Section 5 of this Statement.

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 keeping 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 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 (mainly gas-fired) electricity generation capacity by 2030 to support the operation of a predominantly wind and solar electricity system and provide security of supply.

Climate Action Plan

6.1.10 The Proposed Development will contribute to realising the need for *"rapid delivery of flexible gas generation"*, *"at scale and in a timeframe to replace emissions from coal and oil generation as soon as possible to reduce the impact of the carbon budget"*, which is highlighted in the latest Climate Action Plan (CAP24). It will make a significant contribution to 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 gas-fired generation capacity.

Policy Statement on Security of Electricity Supply

6.1.11 The Proposed Development will contribute to a key national priority in supporting the continued security of electricity supply at a national level. It will provide responsive electricity generation capacity to help maintain security of supply while supporting Ireland in its transition to a low carbon economy, in line with the Government's Policy Statement.

National Energy Security Framework

6.1.12 The Proposed Development is in line with the National Energy Security Framework, which recognises that the level of dispatchable generation capacity available to the grid needs to increase significantly over the coming years in order to reliably meet the expected demand for electricity.

National Hydrogen Strategy

6.1.13 By facilitating a sustainable transition to operating off a blend of renewable fuels, such as hydrogen, over the course of its operational life, the project is in keeping with objectives for the long-term transition from natural gas to hydrogen that are set out within the National Hydrogen Strategy.

Energy Security in Ireland to 2030

6.1.14 The Proposed Development will contribute significantly to the realisation of key actions set out in the Energy Security Package published by the Department of the Environment, Climate and Communications in November 2023 including, under

Action 8, the delivery of *"at least 2GW of new, flexible, enduring capacity"* and, under Action 12, accelerating the delivery of power system flexibility.

6.2 Compliance with Sectoral Strategy

6.2.1 The Proposed Development is also consistent with a range of sectoral strategy documents that have been published by Eirgrid over recent years. The *'Shaping our Electricity Future'* document, for example, which was updated in 2023, recognises the importance of 'network reinforcements' to manage increased renewable generation and continued demand growth and notes that *"the development of new…clean dispatchable capacity* [such as the Proposed Development]*…is critical in mitigating the risks related to potential supply shortfalls*".

6.2.2 Similarly, the *'Strategy 2020-50: Transform the Power System for Future Generations'* document recognises the need for flexible, dispatchable generation capacity such as the Proposed Development so that the grid may be operated in a more dynamic and responsive way as the amount of renewable power increases. The *'Tomorrow's Energy Scenarios'* report also emphasises the need, in all future scenarios, for 'firm dispatchable capacity' to support renewable generation as part of a balanced portfolio of generation capacity to ensure a reliable and flexible power system.

6.2.3 The need for new dispatchable generation capacity is now more pronounced than ever, with the latest all-Ireland *Generation Capacity Statement*, published by Eirgrid/SONI in January 2024, warning of capacity deficits during the 10 years to 2024 in light of much lower than expected delivery of new projects in recent years, and advising that new OCGT and CCGT units are urgently required as part of a balanced portfolio of new capacity.

6.3 Compliance with Regional Policy

Regional Spatial and Economic Strategy

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

6.3.2 The Proposed Development will strengthen the grid for all electricity users, and in doing so will improve the security and quality of 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.

6.3.3 The Proposed Development supports the ambition outlined in the RSES to support and facilitate the development of enhanced electricity in the Region to enable the transmission system to safely accommodate more diverse power flows from renewable generation and to facilitate future growth in electricity demand.

6.3.4 The proposal is also in keeping with RPO 10.20, 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 older, more carbon intensive power plants.

6.3.5 The proposal is also in compliance with RPO 10.22 which supports the development of new electricity transmission infrastructure to ensure that future energy needs can be delivered in a sustainable manner, and that capacity is available at local and regional scale to meet future needs.

6.4 Compliance with Local Policy

Offaly County Development Plan 2021-2027

Chapter 3 - Climate Action and Energy

6.4.1 The Proposed Development would support renewable generation technologies and enhance security of supply. It complies with Strategic Aims of Chapter 3 of the CDP, which seeks to *'achieve a transition to an economically competitive, low carbon, climate resilient and environmentally sustainable county'*.

6.4.2 It will contribute directly to the realisation of individual policy objectives within the Plan, including CAEP-01 (*'Facilitate the development, reinforcement, renewal and expansion of the electricity transmission and distribution grid'*), CAEP-05 (*'Support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission/distribution of renewable energy focussed generation across the major demand centres'*), CAEP-11 (*'Support the transition to a competitive, low carbon, climate resilient and environmentally sustainable economy by 2050'*) and CAEO-9 (*'Support further extension of the gas grid into County Offaly'*).

6.4.3 It is in keeping with the Council's vision for the transition of the county's extensive peatland areas to a range of alternative uses, including energy development (CAEP-13 – Peatlands).

Chapter 5 – Economic Development

6.4.4 The Council, furthermore, in considering economic development opportunities for the county, recognises the redevelopment potential of sites such as 'Derrygreenagh Works'. Chapter 5 of the Plan notes that the *"Council acknowledges and is in favour of the redevelopment and/or expansion of currently used and disused sites such*

as…Bord na Móna works"[73] and notes the significant potential for growth of the energy sector as a major employer in the county.

6.5 Development Benefits

6.5.1 The Proposed Development is urgently needed to provide resilience to Ireland's electricity grid and address forecast electricity capacity shortfalls in the face of unprecedented demand. The proposed plant will support the increased roll out of renewable generation technologies and replace generating capacity lost through the planned retirement of more carbon-intensive conventional power stations in the coming years.

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

- 710MW additional generation capacity to meet increasing electricity demand and address forecast capacity deficits;
- A new source of flexible, dispatchable generation capacity to complement renewable technologies;
- Supports the transition to a renewables-based grid;
- Significant capital investment in the local and regional economy;
- Up to 750 construction jobs as well as supply chain opportunities for local businesses;
- Long term employment during the operational phase, with up to 60 qualified personnel required for the operation, maintenance and management of the plant;
- Efficient re-use of underutilised brownfield land;
- Supports economic development objectives which rely on secure energy supply;
- A significant Community Benefit Fund (€450,000 over a 5 year period).

6.6 Assessment Conclusions

6.6.1 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.

6.6.2 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 (mainly gas-fired) generation capacity by 2030.

[73] CDP, p184 & Policy ENTP-24

6.6.3 It will help to facilitate the transition to a low-carbon economy by supporting the transition to a more diverse renewable-based power generation system.

6.6.4 The flexible, dispatchable generation capacity provided by the proposed plant will support intermittent renewable generation technologies while significantly improving overall security of electricity supply.

6.6.5 It represents an entirely appropriate use of industrial peatland and an underutilised, brownfield works site and will facilitate significant new employment in the energy sector.

7.0 Summary & 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 'Ten Year Generation Capacity Statement 2023-2032, published in January 2024. The latest Climate Action Plan ('CAP24') 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 dispatchable generation capacity to be delivered rapidly and at scale.

7.3 The Proposed Development plant is designed – in response to the very clear need - to fill short term gaps in renewable generation as well as covering any longer periods of low generation from renewable sources. This will help to maintain security of supply while supporting Ireland in its transition to a low carbon economy, in line with NDP and CAP24 objectives.

7.4 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.

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

- 710MW additional generation capacity to meet increasing electricity demand and address forecast capacity deficits;
- A new source of flexible, dispatchable generation capacity to complement renewable technologies;
- Supports the transition to a renewables-based grid;
- Significant capital investment in the local and regional economy;
- Up to 750 construction phase jobs as well as supply chain opportunities for local businesses;
- Long term employment during the operational phase, with up to 60 qualified personnel required for the operation, maintenance and management of the plant;
- Efficient re-use of underutilised brownfield land;
- Supports economic development objectives which rely on secure energy supply;
- A significant Community Benefit Fund (€450,000 over a 5-year period)

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