



An Bord Pleanála  
64 Marlborough Street,  
Dublin 1  
D01 V902

Just Transition Greens  
16/17 Suffolk Street  
Dublin 2  
D02 AT85

Tuesday 28 September 2021

Case reference: PA08.311233  
Project number: PR-452891

Dear Sir/Madam,

On behalf of the Just Transition Greens, we wish to make the following observations on case reference PA08.311233 ("10-year permission for proposed Shannon Technology and Energy Park consisting of power plant, battery energy storage system, floating storage and regasification unit, jetty, onshore receiving facilities, above ground installation and all ancillary structures/works.")<sup>1</sup>

Our observations relate to both:

- i. the implications of the proposed development for proper planning and sustainable development in the area concerned; and
- ii. the likely effects on the environment of the proposed development.

Notwithstanding any other reasons to deny the application, current and explicitly-stated Government policy is that "pending the outcome of a review of the security of energy supply of Ireland's electricity and natural gas systems, it would not be appropriate for the development of any LNG terminals in Ireland to be permitted or proceeded with"<sup>2</sup>

This policy is positioned not only in relation to the importation of gas extracted using hydraulic fracturing, but also in the need for Ireland to consider future energy sources (i.e. "in the context of ensuring a sustainable pathway to net zero emissions by 2050," and "reducing Ireland's

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<sup>1</sup> <https://www.pleanala.ie/en-ie/case/311233>

<sup>2</sup> Government of Ireland, Policy Statement on the Importation of Fracked Gas, May 2021, <https://www.gov.ie/en/publication/f3774-policy-statement-on-the-importation-of-fracked-gas/>

greenhouse gas emissions in line with the Programme for Government ... [which] will lead to a lower annual use of natural gas than would otherwise be the case thus reducing the potential risks to security of supply.”)

The review of the security of energy supply will inform “whether it would be appropriate, or not, to develop LNG terminals in Ireland and, if any such terminals were to be developed, whether they should only be in order to provide a contingency supply in the event of failure of existing natural gas supply infrastructure.”

As such it would be contrary to explicitly-stated Government policy for An Bord Pleanála to grant permission for the proposed development before the completion of this review. We therefore call on you to deny the application at this time, notwithstanding any other reason to do so.

### **Cumulative assessment of associated data centre**

The August 2021 Planning Report of the proposed development states that “an overall masterplan for the Shannon Technology and Energy Park has been prepared and is submitted for information with the planning application. This includes a (future) Data Centre Campus. The data centre will be subject to a separate planning application.”

A previous iteration of the plan, as stated in the minutes of a meeting of 21 May 2019 between An Bord Pleanála and the applicant’s representatives, included “a suitable energy user such as a data centre or other use which requires cooling as part of its industrial process to provide an energy efficient synergy with the LNG terminal and CHP plant. Excess power would be exported to the national grid” (emphasis added).

This plan has clearly not changed, given the proposals submitted in the August 2021 Planning Report. This report says the data centre will be the subject of future planning applications, but it should be assessed now as part of a cumulative assessment.<sup>3</sup>

For this reason also, we submit that An Bord Pleanála should deny this application at this time.

Sincerely,

Cllr Oliver Moran  
Secretary

Bartholomew Begley  
Policy Co-convenor

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<sup>3</sup> This was stated also by Inland Fisheries Ireland: Case reference: PA08.311233, Application Form for Permission / Approval in respect of a Strategic Infrastructure Development: Pre-Application Consultation Summary (page 3).