



ShannonLNG Limited
a new fortress energy company

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Mr Damien Ginty
Senior Planner
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23 FEB 2022

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Dear Mr. Ginty

RE: KERRY COUNTY DEVELOPMENT PLAN

The current consultation on the draft Kerry County Development Plan 2022-2028 refers.

As you may be aware, the current planning application for the proposed **Shannon Technology and Energy Park (STEP)**, consisting of a power plant, battery energy storage system, floating storage and regasification unit, jetty, onshore receiving facilities, above ground installation and all ancillary structures/works in the townlands of Kilcolgan Lower and Ralappane, Co. Kerry, is currently with An Bord Pleanála as a Strategic Infrastructure Development, register reference ABP-311233-21.

We welcome the strong policy support for such development as articulated in the draft Plan, in particular:

- the economic development policies of the draft Plan, specifically:
 - Section 9.6.1.1 and objective KCDP 9-24, which seeks to: *promote and facilitate the sustainable development of the Tarbert-Ballylongford landbank for industry, utilising the presence of deep water, existing infrastructure, natural resources, and waterside location to harness the potential of this Strategic Location. Proposals for marine related industry, general industrial development, and particularly those industries creating a synergism with existing uses and contributing to the development of a strategic energy hub at this location will also be encouraged.*
 - Section 9.7.2 of the draft Plan which states that: *Kerry County Council, Munster Technological University (MTU) and companies such as Fexco and DairyMaster, who are global leaders in the Fin-Tech and Smart Agri disciplines are exploring the potential for targeted growth of these sectors within the Kerry Hub and Knowledge Triangle and throughout the wider Southern Region. There will be opportunities to build on the existing enterprise base in Kerry and develop strengths in emerging digital sectors and in the strategic growth areas of analytics and data.*

- Objective KCDP 9-35 which seeks to: *promote the continued growth of the ICT and Fin-tech sector in Kerry by facilitating the conditions conducive to such development include the creation of high-quality physical environments offering a range of building and office accommodation types, supported through the provision of the necessary services and transport infrastructure.*
- the energy policies set out in Chapter 12 of the draft Plan, in particular:
 - Objective KCDP 12-3 which seeks to: *Facilitate the expansion of the gas network, including the facilitation of a gas importation facility in the Tarbert/Ballylongford Landbank...*
 - Policy for Kilpaddoge, in that: *Kerry County Council supports the maintenance and upgrading of existing high voltage electrical infrastructure, and the provision of new high voltage transformer stations and new overhead transmission power lines subject to no significant adverse effects on the environment or Natura 2000 sites. Such infrastructure may be required for reinforcement of the transmission network, related to growing electricity demand from existing customers, as well as connection of new generation and large demand customers (i.e., industry)*
 - Objective KCDP 12-7, which seeks: *to support and facilitate the sustainable development of enhanced electricity and gas supplies, additional electricity generation capacity, and associated networks, to serve the existing and future needs of the County.*

While acknowledging section 2.6.2.2 of the draft Plan in respect of Energy Policy and Planning, we would request that the policies of the draft Plan be further strengthened in respect of the role of gas in addressing security of energy supply, having regard to:

- **National Strategic Outcome (NSO) 8** of the National Planning Framework, in relation to the 'Transition to a Low Carbon and Climate Resilient Society', which states that: *our gas storage capacity is limited, which poses a security of supply risk and constrains smoothing of seasonal fluctuation in gas prices*
- **National Development Plan 2018-2027** which states that: *a proportion of Ireland's electricity needs will likely continue to be generated from gas over the medium to longer term*
- **National Energy and Climate Plan (NECP) 2021-2030** which seeks to: *Ensure the resilience of the gas network to a long-duration supply disruption, in the context of EU and national climate objectives*
- **Climate Action Plan 2021** which includes the delivery of: *circa 2 GW of new flexible gas-fired power stations in support of a high variable renewable electricity system to contribute to the required 51% in emissions reductions*
- **All-Ireland Generation Statement 2020-2029** which states that new additional gas fired conventional power plants are urgently required on the grid, and
- **Policy Statement on Security of Electricity Supply**, November 2021, which includes explicit Government approval that: *the development of new conventional generation (including gas-fired and gas oil/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. It is appropriate for additional natural gas transmission and distribution grid infrastructure to be permitted and developed in order to support security of electricity supply.

It is understood that a new Policy Statement on Security of Energy Supply is to be published in 2022. Since October 2018 seven separate security of energy supply reviews have been carried out by Government¹, all of which have consistently identified the risks associated with Ireland's dependence on a single gas supply point from the UK.

In this context, we would respectfully request Kerry County Council to specifically refer to the need for additional infrastructure, including additional natural gas infrastructure, to address the intermittency problem in wind generation, and thereby contribute to the security of energy supply in Ireland.

Regards



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¹ Refer to Chapter 4 of Shannon Technology and Energy Park – Volume 2 Environmental Impact Assessment Report, www.stepplanning.com