

Appendices

Appendix 1. Introduction	2
Appendix 2. Background to the Project	4
Appendix 3. Description of the Development	6
Appendix 6. Scoping and Consultation	10
Appendix 10. Traffic	17
Appendix 11. Noise and Vibration	19
Appendix 12. Flora and Fauna	23
Appendix 13. Soils Geology and Groundwater	52
Appendix 14. Surface Water	54
Appendix 15. Air Quality and Climate	61
Appendix 16. Landscape and Visual	69
Appendix 17. Material Assets	84

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Appendix 1. Introduction

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1.1. Strategic Infrastructure Notification

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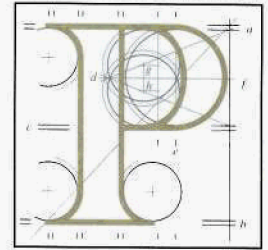
Our Ref: 26.PC0078

Your Ref:

M. G. Martin - Luengo
Endesa Ireland Limited
3 Grand Canal Plaza
5th Floor
Grand Canal Street Upper
Dublin 4.

	DATE
CEO	
CFO	in/2009/
EMD	212
PRD	
✓END	06/11/09
DOD	
LED	
IRD	

An Bord Pleanála



5th November 2009

Re: Combined Cycle Gas Turbine Power Plant At Great Island,
Co. Wexford

Dear Sir,

Please be advised that following consultations under section 37B of the Planning and Development Act, 2000 as amended, the Board hereby serves notice under section 37B(4)(a) that it is of the opinion that the proposed development falls within the scope of paragraphs 37A(2)(a) and (b) of the Act. Accordingly, the Board has decided that the proposed development would be strategic infrastructure within the meaning of section 37A of the Planning and Development Act, 2000, as amended. Any application for permission for the proposed development must therefore be made directly to An Bord Pleanála under section 37E of the Act.

Please also be informed that the Board considers that the pre-application consultation process in respect of this proposed development is now closed.


Attached is a list of prescribed bodies to be notified of the application of the proposed development. Please also find attached the record of the meeting with the Board which took place on the 28th of October, 2009.

In accordance with section 146(5) of the Planning and Development Act, 2000 as amended, the Board will make available for inspection and purchase at its offices the documents relating to the decision within 3 working days following its decision. This information is normally made available on the list of decided cases on the website on the Wednesday following the week in which the decision is made.

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

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

Yours faithfully,


Kieran Somers
Executive Officer

PC09.LTR



64 Sráid Maoilbhríde,
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Appendix 2. Background to the Project

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2.1. EirGrid Input to ESB Asset Strategy

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31 October 2007

Eugene Coughlan
Commission for Energy Regulation
The Exchange
Belgard Square North
Tallaght
Dublin 24

Our Ref: ESBASSET0701-001

Re. EirGrid Input to ESB Asset Strategy

Dear Eugene

I am writing to you following our tripartite meeting with ESB Power Generation on Monday 22nd October which followed an earlier tripartite meeting on Monday 27th August. At the most recent meeting we undertook to revert to you and to provide, to the extent readily available, information regarding the suitability for the installation of base load plant at the existing ESB Power Generation sites at both Tarbert and Great Island, the potential implications for other parties should base load plant be connected there, and to provide any indication based upon our best professional judgement as to how much additional peaking plant could be installed at Tarbert.

Background

EirGrid enters into contractual arrangements with parties for connection and access rights to the transmission system for a given level of contracted capacity, premised upon a given technology which allows EirGrid to plan the system premised upon an assumed load factor and running pattern. This allows EirGrid to seek to plan both the shallow connection works and associated reinforcements in the most efficient manner taking into account the costs of additional network development in combination with any benefits in terms of reduced constraint costs or enhanced operational flexibility which may result.

EirGrid currently holds connection agreements with ESB Power Generation for 589.4 MW of (mid/low merit) capacity at Tarbert and 216 MW of (mid/low merit) capacity at Great Island. Consistent with any general principle of sale or assignment EirGrid believes that it would be reasonable that the capacity rights currently assigned to any particular connection point – that is the size of the capacity associated with the given technology, load factor and assumed running pattern - could, without further works, be transferred from ESB Power Generation to another party. As part of its duty to ensure it plans a safe, secure and reliable transmission system, as well as its duty to ensure it does not discriminate unfairly, EirGrid would not be in a position to offer any additional rights to any party without first carrying out the necessary studies, or following the processes and procedures, for the issuing of connection offers to parties.

Should it be the desire of ESB Power Generation, or the Commission, to seek to offer the sites identified with either greater capacity than that currently contracted, or for redevelopment by another party utilising technology of a different kind with differences in the assumed running order of the plant, then, in order to identify the implications of the reservation of such capacity, both upon overall network development and indeed other connecting applicants, or applicants seeking to connect, EirGrid would need to undertake detailed network studies, similar to those under the process for applicants seeking to connect, and premised upon certain assumptions regarding the behaviour of these and other participants. In particular this would bring to bear questions around the priority of

access of this plant when compared to other parties connected who currently have non firm access rights in anticipation of the completion of associated network reinforcements (deep works), and indeed those parties who do not yet have contracts for connection but who have been seeking access to the system and who will be processed under Gate 2 or subsequent gates as part of the group processing approach.

Notwithstanding this, EirGrid is happy to assist the Commission to the extent possible on an informal basis, and provide certain additional information to the Commission in this letter, based upon off the shelf studies available to it. EirGrid cannot, however, be definitive about the impacts, or indeed any works which might be required in the absence of carrying out detailed studies for specific plant proposals, which would need to be based upon certain assumptions concerning the treatment of access vis a vis other applicants either currently connecting, or in the application queue. While the information provided herein is based upon best System Operator professional judgement, and a number of desk exercises carried out by EirGrid, the Commission should be aware in interpreting it that the information contained herein is subject to change, given the number of assumptions which have had by necessity, to be made about the works required for and take up of Gate 2 as well as the behaviour of other elements of the plant portfolio. EirGrid therefore stipulates that, in relation to any proposal for the redevelopment of these sites, the information provided in this or subsequent correspondence only be provided to applicants on the same basis and accompanied by the same caveats which EirGrid places upon such information.

Potential Suitability of Great Island

In general terms EirGrid can advise the Commission that Great Island is likely to be a good location on the network to connect a new base load generating station. The recently published Forecast Statement, although prepared upon a basis different to the type of analysis necessary for connection studies, identifies 250-400 MW of available generation capacity for connection at the Great Island node post the completion of the Athlone – Shannonbridge 110kV line in Qtr 4 of 2011. This would be prior to the connection of

any Gate 2 wind plant. While we would not expect the level of Gate 2 plant connecting in the area to be too significant – connection offers are to be issued to c.120 MW of wind plant in the South East - the impact of further connection of wind plant, and indeed the new CCGT plant in the Cork area, would be expected to have a secondary impact and to alter the overall flows upon the network. In assessing the ability of a plant to connect, one would also have to make additional assumptions with respect to other plant seeking to connect in the area, most notably the 98 MW OCGT application which has been received by EirGrid seeking connection at Kilkenny of which EirGrid has previously made the Commission aware.

In addition to the information contained in the Forecast Statement, EirGrid has previously carried out studies as to the effect upon the network should there be plant closure, and no replacement, at Great Island. These studies showed that significant problems arise in the south east of the county which would necessitate large scale reinforcement in this area to resolve. Additional generation in the area, although is likely in itself to cause some need for reinforcement, is also likely to alleviate a portion (the scale is dependant on size and location) of the aforementioned reinforcement needs in the south east and reduce the overall needs in the area.

Therefore, in general, while EirGrid is unable to be definitive about the potential suitability of connecting additional base load plant at, or close to Great Island, in the absence of carrying out further studies, and in particular the scale of base load plant which could be accommodated, Great Island is in a general terms a favourable location for the connection of new plant and would be happy to advise any potential or intending applicants of this verbally in anticipation of the submission of any application for connection.

Potential Suitability of Tarbert

Notwithstanding the networks access rights which are currently granted to ESB Power Generation at Tarbert and which could in accordance with the principles outlined above

be assigned or transferred to another party, EirGrid is of the opinion, in general terms, that Tarbert no longer represents a desirable point for the connection of new, or replacement capacity, given the congestion, and associated reinforcements being seen in the South West of the country with ever increasing penetration of wind plant. The current network congestion being experienced in the Shannon area would be exacerbated to the extent that any replacement plant would be expected have greater run time, be closer to base load, than the existing plant portfolio. At a minimum this would have the potential to increase the level of constraints for wind plant with non-firm access in the area, and could, dependent upon the precise scenarios considered, entail considerable additional network build with longer lead times than anticipated, or higher constraint costs, prior to plant receiving firm access for their full contracted capacity. The recently published Transmission Forecast Statement indicates 'low', less than 100MW, generation opportunity at Tarbert. This was premised upon the continued connection of the existing 580MW of mid/ low merit plant but was prior to the connection of any wind plant under Gate 2. It is therefore unlikely that there would be opportunity to connect significant base load (>100MW) of plant at Tarbert without the need for significant deep reinforcements.

There will be c.650 MW of wind plant under of Gate 2 wind plant which will be issued offers in the South West and which would be likely to interact with any other thermal capacity in the area and would therefore be expected to impinge to some extent on any available capacity at Tarbert. Based on some preliminary and off the shelf studies available to EirGrid, EirGrid believes there could result an almost permanent constraint during high wind periods of the entire c. 590MW of generation in Tarbert if it were to be replaced with base load plant assuming that Gate 2 wind is granted firm access in advance of Tarbert and full take up of the Gate 2 offers in this area.

Therefore in general terms, and without the conduct of the necessary detailed connection studies, EirGrid believes that Tarbert is at this point in time not a desirable point for new connection of base load plant, but would be better suited to a more complementary form of generation for the predicted wind generation in the south west of the country. The precise scale of additional peaking plant which could be accommodated would need to be

the subject of further study and would depend upon the degree to which it was expected to operate counter phase to the wind in the area.

Basis for the Assessment of Suitability for New Generation

There is increased difficulty in carrying out studies of the nature previously undertaken by EirGrid for the Commission with the ever increasing number of assumptions which must be employed in so doing given the open status of Gate 2 at this time, both in terms of the number of plant which will accept offers, but also given that the identification of the precise connection points and overall deep reinforcements which will result, as well as the criteria and access rights to be assumed for other parties still in the connection queue, both thermal and renewable. On that basis EirGrid believes that in order to be definitive about the level of capacity which could potentially be committed would necessitate the undertaking of a more detailed suite of connection studies, premised upon a set of agreed assumptions, and which would inevitably take some time to process.

EirGrid understands that consistent with the Regulatory Authorities' decision of September 2006 the concept of 'deemed firmness', whereby parties will be granted firm access prior to the completion of the identified deep reinforcements consistent with the Transmission Planning Criteria will no longer exist come the commencement of SEM. EirGrid believes that to seek to offer for contract capacity which differs from that currently held by ESB Power Generation,, in the absence of the studies to identify the necessary works, and the completion of same, would effectively constitute the granting of deemed firm access.

EirGrid therefore suggests that, while the information provided by EirGrid in this letter may provide some indication to both the Commission and ESB Power Generation as to the likely suitability of the sites identified that the best approach would be for ESB Power Generation, or any party who might have a potential interest in the sites offered, to

submit connection applications for any capacity, other than that which already exists,¹ premised upon the existing plant portfolio as an ongoing concern, which they might wish to offer with the sale of any identified sites. EirGrid could then further liaise with the Commission as to the best means by which to process such applications and the appropriate assumptions to make with respect to the processing of same.

In the meantime should you wish to discuss the contents of this letter further please do not hesitate to get in touch.

Yours sincerely

Simon Grimes
Manager, Commercial & Regulation, EirGrid
EirGrid

cc. Andrew Ebrill, CER

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¹ The existing capacity being premised upon existing technology and therefore assumptions concerning typical running pattern etc..

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