

Environmental Licensing Programme
Office of Environmental Sustainability

SSE plc
SSE Generation Ireland Ltd.
Great Island CCGT
Campile, New Ross
Co. Wexford
Ireland

4th April 2023

To: Mr. Philip Stack, Office of Environmental Sustainability, EPA
Date: 04.04.2023
Licence Ref: Great Island Generating Station - (P0606-04)
Re: **Notice pursuant to Regulation 28 of the EPA (Industrial Emissions) (Licensing) Regulations 2013, in respect of the proposed determination on a licence review application by SSE Generation Ireland Limited, Reg. No. P0606-04**

Dear Mr. Stack,

Further to the Environmental Protection Agency's (EPA) Regulation 28 Notice dated 13 March 2023, SSE makes the following submission:

1. Input and Output Capacities

The input (MW_{th}) and output (MWe) capacities of the installation referenced in the licence review application, differ from those referenced in the previous licence review application (P0606-03) and in planning permission (Ref. no. 26.PA0016), granted for the construction of the CCGT by An Bord Pleanála.

The Input Capacity and Output capacity of the Great Island CCGT (the "Installation") were estimated at the time of applications P0606-03 and 26.PA0016 as the actual as-built capacities of the Installation could not be tested. Environmental conditions impact the Installation's efficiency, therefore, at the time the applications were made the output capacity could only be estimated. This was stated within sections 3.11 and 3.13 of the Environmental Impact Statement (EIS) submitted in support of the planning application.

The Installation was constructed in full accordance with the planning Permission. It was only at the plant performance testing phase when the actual "as built" output capacity could be ascertained. Following testing, once the Input Capacity and Output capacity of the Installation were known, the actual capacities were stated in Application P0606-04.

SSE plc

Registered Office: Inveralmond House 200 Dunkeld Road Perth PH1 3AQ Registered in Scotland No. SC117119.

Authorised and regulated by the Financial Conduct Authority for certain consumer credit activities.

sse.com

2. Planning Permission

Having regard to sections 1, 3, and 4 of the objection by Mr. Paul Barlow received by the Agency on 07 March 2022, confirm that planning permission is in place for the installation, as constructed and operated, and has been agreed with the planning authority.

Output and Input Capacity

The Installation was constructed and operates fully in accordance with planning permission 26.PA0016 granted by An Bord Pleanála on 29 July 2010. There is no constraint on the electrical output capacity or input capacity of the Installation within the planning application.

An EIS was submitted with the planning application, which considered the environmental impacts of the Installation during both the construction and operational phases. Sections 3.11 and 3.13 of the EIS contained clear statements that the quoted capacities were estimated and could not be confirmed at the time of submitting the planning application.

During construction of a power station, the as-built output capacity cannot be determined until testing of the as-built plant has been completed. The estimated output capacity was derived from an existing Installation operated by Endesa in Spain. Therefore, the EIS contained clear statements that the output capacity of 430 MWe was estimated.

Notwithstanding the fact that the Installation was constructed and operates fully in accordance with planning permission 26.PA0016, the following information in this Output and Input Capacity section is provided to illustrate that Wexford County Council had knowledge of the estimated and as-built Output Capacity of the Installation.

It is understood that during discussions between Endesa Ireland (then site operator) and Wexford County Council, Wexford County Council was made aware that the as-built generation capacity could not be determined until the Installation had been constructed and performance testing had been completed. This explains Wexford County Council's response to the planning consultation which is titled:

“Combined Cycle Gas Turbine Power Plant with an electrical export capacity of 400-450MW, Great Island, Co. Wexford.”

During commissioning and testing of the unit in late 2014 and early 2015, tests were carried out under the supervision of Eirgrid, the Transmission System Operator, to determine the actual Registered Capacity of the Installation at ISO conditions. This demonstrated the Registered Capacity when combusting natural gas was 464 MWe. No alterations to the plant were made during the build and the capacity achieved resulted from the particular ambient atmospheric pressure and temperature and river water temperatures existent at the site.

The as-built output capacity of 464 MWe was referred to in documentation submitted to Wexford County Council in the following planning applications relating to the Installation, all of which were granted planning consent:

Planning Application Number	Submission Date	Award Date
20171116	21/08/2017	06/10/2017
20171117	21/08/2017	06/10/2017
20180580	02/05/2018	13/06/2018
20180581	02/05/2018	13/06/2018
20191338	30/09/2019	15/11/2019

Furthermore, the station ISO output capacity of 464 MWe is the output capacity used by Wexford County Council as the basis of the rateable valuation of the site, upon which the station's current annual rate contribution to Wexford County Council is calculated.

Cooling Water

The Installation was constructed and operates fully in accordance with planning permission 26.PA0016/20109999. There is no constraint on the quantities of water abstracted or discharged within the planning permission.

The water intake systems employed at the Installation are existing infrastructure, no changes were proposed to this infrastructure within the planning application. The quantities of water abstracted and discharged are regulated by the licence rather than the planning permission. The figures in the current licence P0606-03 represent a significant reduction from the limit value in the preceding licence number, P0606-02. In relation to the previous limit value of 1,204,080 m³/day, the Planning Inspector's Report stated that "There are no negative effects from the existing discharge plume".

Traffic Impacts

The Installation was constructed and operates fully in accordance with planning permission 26.PA0016/20109999. There is no constraint on the number of vehicle movements (including vehicle movements of sodium hypochlorite) transported per day in the planning permission. Within the Traffic

Assessment contained in Section 10 of the EIS, it was estimated that there would be 6 deliveries (including vehicle movements of sodium hypochlorite) to the site per day during the operational phase. Since commencing operation, there are typically less than 6 deliveries received at the Installation per day.

Summary

SSE confirms that planning permission is in place for the Installation, as constructed and operated, and has been agreed with the planning authority.

We trust that the above information is sufficient to resolve the outstanding queries. Please don't hesitate to contact me if you need any further clarification on the above.

Yours sincerely,



Jonathan Storey
Environmental & Chemistry
T: +353 (0) 539154280
M: +353 (0) 864116368