



Not Here Not Anywhere  
[www.notherenotanywhere.com](http://www.notherenotanywhere.com)

T:@NHNAireland

I:@notherenotanywherenhna

F:@notherenotanywherenhna

*For a fossil free future for Ireland*

Fingal County Council - Planning Dept.,  
Civic Offices,  
Grove Road,  
Blanchardstown,  
Dublin 15  
D15 W638

6th June 2023

**Planning Application Reference:** FW22A/0204

**Applicant:** Kilshane Energy Ltd.

**Location:** Kilshane Road, Kilshane, Finglas, Dublin 11.

**Proposed development:**

1. The construction of a new Gas Turbine Power Generation Station with an output of up to 293 Megawatts. The proposed station will consist of 1 no. Gas Turbine and 1 no. 28 m high Exhaust Stack partially enclosed by a 12 m high acoustic wall. 1 no. single storey Admin Building and Warehouse (c. 926 m<sup>2</sup>), 1 no. single storey Packaged Electronic/Electrical Control Compartment (PEECC) (c. 72 m<sup>2</sup>), 1 no. single storey Continuous Emission Monitoring System (CEMS) Shelter (c. 14.8 m<sup>2</sup>), 1 no. 16.2m high x 024.4m Fuel Oil Tank, 1 no. 15.3m high x 09.2m Raw/Fire Water Tank, 1 no. 16.2m high x 018.3m Demin Water Tank, and miscellaneous plant equipment.
2. The demolition of a detached residential dwelling (c. 142 m<sup>2</sup> GFA) and associated farm buildings (c. 427 m<sup>2</sup> GFA) located in the north west corner of the subject site to facilitate the proposed development.
3. Road improvement works to 493.34 m Kilshane Road (L3120), including the realignment of a portion of the road (293.86 m) within the subject site boundary and the provision of new footpaths, off-road cycle ways, together with the construction of a new roundabout linking the proposed realignment of Kilshane Road back to the existing road network to the northeast of the subject site and to the proposed internal road network to serve the proposed development.
4. The construction of entrance gates, low wall and railings fronting the realigned Kilshane Road and a private internal road network providing for vehicular, cyclist and pedestrian access to serve the development. Construction of 3 m high security fencing within development.  
S. Total provision of 26 no. car parking spaces including 1 no. disabled persons parking space and 2 no. EV electrical charging points.
6. Provision of security lighting columns to serve the development and the installation of Closed-Circuit Television System (CCTV) for surveillance and security purposes.
7. Provision of 20 no. sheltered bicycle parking spaces.
8. Provision of hard and soft landscaping works, tree planting and boundary treatments including 3 m high security fence along Kilshane Road and the perimeter of the subject site boundary.
9. Provision of new on-site foul sewer pumping station to serve the development.
10. Provision of underground surface water attenuation areas to serve the development.

Dear Fingal County Council Planning Section,

I am writing to you to make the following submission to the Planning Application FW22A/0204 on behalf of Not Here Not Anywhere, a nationwide, grassroots, non-partisan group campaigning to end fossil fuel exploration and the development of new fossil fuel infrastructure in Ireland and across the world. We advocate for fair society-wide energy usage and a just transition to renewable energy systems.

NHNA welcomes Ireland's commitment to transition to net zero by 2030 and the urgent adaptation of our energy supply. We recognise that the transition to renewables must be carried out in a way that guarantees nationwide energy security. However, we argue that the development of new fossil fuel infrastructure to facilitate this transition is not a viable solution.

## I. Executive Summary

This objection shall provide a brief outline of our grounds for objection to the subject development. We believe that the specific features of the subject development are immaterial to the decision at hand, as the development of any new gas infrastructure is incompatible with the numerous climate action instruments Ireland are party to.

This objection shall provide a summary of the most noticeable international climate agreements to which Ireland is a party state; most notably the Beyond Oil and Gas Alliance, the Paris Climate Accord and the COP26 Global Methane Pledge. We further elaborate on the incompatibility of the Subject Development with our international agreements in Section II of this objection.

We firmly believe that the National Climate Objective as specified within the **Climate Action and Low Carbon Development (Amendment) Act 2021** is incompatible with the continued growth of fossil fuel infrastructure. Other elements of our legally binding national climate obligations are outlined in Section III of this letter.

We attempt to debunk some common myths about the need for this development and achieving true net zero in section IV and V of this letter.

## II. International Climate Agreements

### **Beyond Oil and Gas Alliance**

During the UNFCCC Conference of the Parties held in Glasgow in November 2021, Ireland became a core member of the international Beyond Oil and Gas Alliance<sup>1</sup> (BOGA) - an international alliance committed to aligning the usage and production of Oil and Gas to the objectives of the Paris Climate Accord.<sup>2</sup> With the accession to the BOGA, the Irish Government acknowledged and committed to a 55% reduction in natural gas between 2020 and 2030.

It is therefore highly concerning to see plans continuing for the development of multiple gas-powered electricity generation plants such as the subject application. It would be inconsistent with the objectives Ireland committed themselves to under the BOGA.

### **COP26 Global Methane Pledge**

In addition, during the COP26 talks Ireland joined the Global Methane Pledge. The Pledge participants commit to voluntarily reducing Methane emissions by 30% on 2020 levels by 2030<sup>3</sup>. Methane, as a greenhouse gas has been shown to have a global warming effect 86 times that of

---

<sup>1</sup> Department of Environment, Climate and Communications, “Minister Ryan announces that Ireland has joined the Beyond Oil & Gas Alliance (BOGA) to lead the transition away from global oil and gas production”, (11 Nov 2021)

<sup>2</sup> Beyond Oil and Gas, “Who We Are”, Accessed on 24 January < <https://beyondoilandgasalliance.com/who-we-are/> >

<sup>3</sup> Global Methane Pledge, “Home Page”, Accessed on 24 January < <https://www.globalmethanepledge.org> >

CO<sub>2</sub>.<sup>4</sup> While natural gas is often hailed as a ‘clean alternative’ to oil and coal, due to the lower level of CO<sub>2</sub> emissions, it fails the test because of the high-level methane leakage at all stages of the natural gas journey.<sup>5</sup>

There is little to no justification for gas-powered electricity generation plants accompanying the transition to renewable energy in a net-neutral carbon society. McMullin and Price have emphasised the need for “extremely rapid and immediate absolute reductions in near-term fossil fuel usage, at a year-on-year rate of c. 20%, falling effectively to zero within 10-15 years (c. 2030-2035)”.

The cumulative impact of proposed new gas-powered electricity generation plants cannot be overstated, and as such, the proposed development should not proceed.

### III. National Climate Obligations

#### **Climate Action and Low Carbon Development (Amendment) Act 2021**

The Climate Action and Low Carbon Development (Amendment) Act of 2021 (hereinafter “Climate Act”) outlines Ireland’s legal obligations to pursue and achieve a “climate neutral” society by 2050,<sup>6</sup> and to reduce overall GHG emissions by 51% on 2018 levels by the 31<sup>st</sup> of December 2030.<sup>7</sup>

The ‘carbon lock-in’ effect of developing new gas-powered electricity generation plants will have a long-term impact on the development of the required expansion and growth of renewable energy infrastructure such as wind, solar and hydro. The ability to meet our national and international climate targets will be severely hampered by the growth in fossil fuel infrastructure.<sup>8</sup>

### IV. Achieving Net-Zero

The National Climate Objective sets out the legal commitment to achieve a “climate neutral” society by 2050. Many proponents who support the continued use of fossil fuels as a source of energy generation will argue that we can still meet the required emission reductions through Carbon Capture Storage Systems (CSS). The fundamental basis of a “net-neutral” or “climate neutral” society assumes that there is the present or future ability to actively remove GHG from the atmosphere using CSS.

This approach and assumption is fundamentally flawed, as CSS is yet to be a viable solution. The current CSS operations are at a scale far too small to have a meaningful impact, are still in the Research & Development stage, and are far more costly than other approaches, such as building renewable energy infrastructure and employing demand management and demand reduction.

---

<sup>4</sup> Myhre et al, *Anthropogenic and Natural Radiative Forcing*, IPCC AR5 Ch 8, P714

<sup>5</sup> Borunda, 2020; Environmental Defense Fund, n.d.

<sup>6</sup> Climate Action and Low Carbon Development (Amendment) Bill 2021, Part 2, Section 5

<sup>7</sup> *Ibid*, Section 9

<sup>8</sup> It must be noted that this is not a standalone plant. While individual in nature, it is part of a wider systemic approach to the current energy crisis. Forming part of plans for more than 7 gas-powered electricity generation plants

## V. Energy Security Concerns

The idea behind the development of these gas-powered electricity generation plants is to deal with the perceived risk of energy deficits in the short-term and to act as a bridging mechanism while we build and expand our renewable energy infrastructure.

However the idea fails on its merits. Per McMullin et al, the “reliance on imported natural gas already raises very serious security-of-supply concerns for the Irish energy system.” The security-of-supply risk is further exacerbated by the reliance on a single, high-carbon fuel, in this case, natural gas.<sup>9</sup>

## VI. Conclusion

Considering the above, we urge Fingal County Council to reject the current application.

If we can provide further clarification or be of any assistance, please do not hesitate to get in touch.

With Kindest Regards,

*Angela Deegan*

*On behalf of Not Here Not Anywhere*

---

<sup>9</sup> McMullin et al, *Is Natural Gas “Essential for Ireland’s Future Energy Security”*, Nov 2018