MERCURY RENEWABLES

(CARROWLEAGH) LIMITED

FIRLOUGH WIND FARM, CO. MAYO

AND

HYDROGEN PLANT, CO. SLIGO

RESPONSE TO INSPECTOR QUESTION No. 3b

'Traffic Policy'

PLANNING APPLICATION REFERENCE

ABP-317560-23

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1 INTRODUCTION

Inspector agenda item 3 states:

3 (b) In the National Roads Policies, P-NR-1 in the current Sligo Development Plan, 2017-2022 as extended, seeks to avoid the creation of generation of increased traffic from existing accesses on the N59 outside the 50 kph speed zone. What **justification** is there for not adhering to this policy?

The Sligo Development Plan 2017-2022 as extended policy states:
P-NR-1;
Protect the traffic carrying capacity of national roads, the level of service they deliver and the period over which they continue to perform efficiently, by avoiding the creation of new access points or the generation of increased traffic from existing accesses onto the N-4, N-15, N-16, N-17 and N-59 outside the 50 km/h speed limit, in accordance with the DOECLG's publication Spatial Planning and National Roads -Guidelines for Planning Authorities (2012).

2 RESPONSE

During the site selection process, the Hydrogen Plant Site's impact on the environment, local communities and the landscape was given careful consideration. The location was required to be relatively remote in nature given the need to have appropriate set back distances to sensitive receptors. It was also required to be in proximity to the Wind Farm in order to be connected by underground cable. Transportation by road required that the Hydrogen Plant be located in close proximity to the national road network.

Chapter 3; Alternatives in the EIAR outlines the alternative locations for the Hydrogen Plant that were considered. All viable alternative sites, within a suitable distance to the wind farm and with access the national road network as required were located in zones over 50km per hour on the National Road network. The exception being Shanaghy, which is located near to Ballina town, this was assessed as having a higher impact on the road network due to a high number of sensitive receptors in Ballina town.

The Hydrogen Plant entrance is located on the L66121, which has an existing entrance on to the N59. During the operational phase the green hydrogen will be transported from the Hydrogen Plant Site using tube trailers. The Applicant commits to a maximum number of tube trailers filled with hydrogen leaving the Hydrogen Plant Site per day of 26. The daily average will be 11. Allowing for up to 10 staff coming to and from work each day will result in a further 20 traffic movements. The daily total will then be 72 traffic movements. The Applicant commits

that tube trailers will only enter and leave the hydrogen plant site between the hours of 7am and 7pm. Over that 12-hour period, this is equivalent to 6 vehicles per hour of which 4-5 would be tube trailers and 1-2 would be staff. Therefore, there will be a minor increase in traffic at the existing access on to the N59 in a zone outside the 50km/h speed limit.

The effect of the increased operational traffic was assessed in Section 15.3.6 of Chapter 15 of the EIAR, Traffic and Transport. The traffic analysis carried out for the N59 / L66121 junction shows that the junction will continue to operate within capacity for all scenarios including the 2050 scenario with the proposed Hydrogen Plant development fully operational – during 2050, the junction will operate at 7.2% capacity and there will be a 16% increase in Average Annual Daily Traffic (AADT) of 16% from that recorded in 2023. These results show that the effect of traffic associated with the operation of the Hydrogen Plant on the existing public road network will be imperceptible due to the improved N59 / L66121 junction layout, the capacity of the junction, traffic profile associated with development traffic distributed throughout the day, low volumes of traffic generated during operation of the development and vehicle turning movements with all development HGV traffic exiting the N59 / L66121 junction in an eastbound direction and approaching in a westbound direction on the N59.

The Proposed Development included for the upgrading of the N59 / L66121 road junction. A Road Safety Audit (see Appendix 15.3 to EIAR) was completed by an independent consultancy (Mr Stuart Summerfield and Mr PJ Gallagher of CST Group, Chartered Consulting Engineers, TII Auditor References SS73290 and PG3425716 respectively). The design of the junction, as submitted by the Applicant, provided for the full implementation of the recommendations of the Road Safety Audit. The proposed junction will result in a safer junction for all users. The junction will be subject to a Stage 2 audit prior to construction, a Stage 3 audit on completion of construction and will be subject to regular Stage 4 audits during operation.

Depending on location, various wind connect / will connect directly to national roads throughout Ireland. The following are (non-exhaustive list) examples:

Oweninny Wind Farm, Co. Mayo (An Bord Pleanala Register Reference 16.PA0029) which connects to the N59, Phase 1 completed 2019, Phase 2 completed 2023
Cloghan Wind Farm, Co. Offaly (Offaly Co. Co. Planning Register References 20/444, 19/555, 14/188 and 19/404) which connects to the N62, completed 2023
Derrinlough Wind Farm, Co. Offaly (An Bord Pleanala Register Reference PA19.306706) which connects to the N62, currently under construction

Inchamore Wind Farm, Co Kerry / Cork which will connect to the N22 (Kerry Co. Co. Register Reference 23/646, An Bord Pleanala Register Reference ABP-317889-23), junction recently consented.

In terms of the carrying capacity of the National Road, no material intensification of use would arise from the Proposed Development, because operational traffic will be very low. The Proposed Development will result in a safer junction configuration for all users.

It is therefore appropriate in the circumstances to locate the Hydrogen Plant close to an existing access point off the N59.