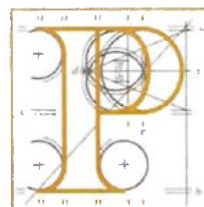


Our Case Number: ABP-317560-23



An
Bord
Pleanála

Health and Safety Authority
3rd Floor
1A South Mall
Co. Cork
T12 R7WC

Date: 01 February 2024

Re: Proposed windfarm development including 13 no. wind turbines in Bunnyconnellan, Co. Mayo and hydrogen plant in Castleconnor, Co. Sligo.
Carrowleagh, Bunnyconnellan, Co. Mayo and Curraun, Castleconnor, Co. Sligo.

Dear Sir / Madam,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime, please contact the undersigned officer of the Board or email sids@pleanala.ie quoting the above mentioned An Bord Pleanála reference number in any correspondence with the Board.

Yours faithfully,

PP EGM

Lauren Murphy
Executive Officer
Direct Line: 01-8737275

PA09

Teil
Glaó Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel (01) 858 8100
LoCall 1800 275 175
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64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902



An tÚdarás Sláinte agus Sábháilteachta
Health and Safety Authority

☎ 0818 289 389 📧 landuseplanning@hsa.ie 🌐 www.hsa.ie

An Board Pleanála
64 Marlborough Street
Dublin 1

By Email to: sids@pleanala.ie

Our Ref: PAR 4171

30th January 2024

Re: Proposed windfarm development including 13 no. wind turbines in Bunnyconnellan, Co. Mayo and hydrogen plant in Castleconnor, Co. Sligo, Carrowleagh, Bunnyconnellan, Co. Mayo and Curraun, Castleconnor, Co. Sligo. SID Case Number ABP-317560-23

Dear Sir, Madam,

I am writing to you in response to a request for technical advice in relation to the above development. This request included new information submitted by the applicant and received from you on 16th January 2024.

The Health and Safety Authority, acting as the Central Competent Authority under the Chemicals Act (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2015 (S.I. 209 of 2015), gives technical advice in response to a notice sent under Article 215 of the Planning and Development Regulations 2001-2021.

Under Regulation 24(2) of S.I. 209 of 2015, the technical advice on the effects of a proposed development on the risk or consequences of a major accident relates to the following types of developments within the consultation distance for an establishment:

- (a) the siting and development of new establishments;
- (b) modifications to establishments of the type described in Regulation 12(1);
- (c) new developments including transport routes, locations of public use and residential areas in the vicinity of establishments, where the siting, modifications or developments may be the source of, or increase the risk or consequences of, a major accident.

The advice given is for the purposes of assessing a new development only. A full explanation of the Authority's Land-use Planning advice system can be found at:

https://www.hsa.ie/eng/Your_Industry/Chemicals/Legislation_Enforcement/COMAH/Land_Use_Planning/

The document should be consulted to fully understand the advice given in this letter.

In that context and the Authority remit, in respect of this specific application the following points are relevant:

1. The application is covered by Regulation 24(2) (a) of S.I. 209 of 2015.
2. Your attention is directed to the need to consult with the local authority emergency services on any potential impact on local access/egress arrangements, in the context of public behaviour in the event of an emergency and access for emergency services, generally and in relation to fire prevention and response issues.
3. Based on the information supplied - *Document Number: BLV-04-R-02; Issue 4.0 dated 11th January – Report Land Use Planning QRA for the Firlough Windfarm Hydrogen Generation Facility Prepared for – Mercury Renewables*; the Health and Safety Authority can confirm, from the details received, that the development will constitute a new lower tier COMAH establishment.


The Authority has determined that the siting criteria for new establishments have been met (see page 10, section 1.4 of above referenced guidance document).

Accordingly, the Authority **DOES NOT ADVISE AGAINST** the granting of planning permission in the context of major accident hazards.

4. Although our LUP advice is risk-based, it is the policy of the Authority to advise planning bodies of the consequences of worst-case major accidents, so that they may take account of this information in their decision making. In this case the consequences relate to:
 - Overpressure
 - A level of 168mbar could be experienced at a distance of 360m from this location.
5. The advice given is only applicable to the specific circumstances of this proposal at this time. The assessment submitted, which formed the basis of the Authority's advice, specifies the particular dangerous substances that will be stored at this location. Changes to those substances or their location could alter that advice. Therefore, part of our technical advice to you is to impose conditions in this regard should you decide to grant planning permission.
6. Future development around COMAH establishments has the potential to impact on the expansion of those establishments.

If you have any queries, please contact the undersigned.

Yours sincerely



Ita Daly
Senior Inspector,
COMAH, Chemical Production & Storage (CCPS)

Encl: Note on the Approach of the HSA to the Provision of Land-use Planning Advice

Note on the Approach of the HSA to the Provision of Land-use Planning advice.

The Authority, acting as the Central Competent Authority under the Chemicals Act (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2015 (S.I. 209 of 2015), gives technical advice in response to a notice sent by a planning authority under Part 11 of the Planning and Development Regulations 2001-2015. Under Regulation 24(2) of S.I. 209 of 2015, the technical advice on the effects of a proposed development on the risk or consequences of a major accident relates to the following types of developments within the consultation distance for an establishment:

- (a) the siting and development of new establishments;
- (b) modifications to establishments of the type described in Regulation 12(1);
- (c) new developments including transport routes, locations of public use and residential areas in the vicinity of establishments, where the siting, modifications or developments may be the source of, or increase the risk or consequences of, a major accident.

The advice given is for the purposes of assessing new development only. A full explanation of the Authority's Land Use Planning advice system can be found at

https://www.hsa.ie/eng/Your_Industry/Chemicals/Legislation_Enforcement/COMAH/Land_Use_Planning/

Your attention is drawn to Regulation 24(3) of S.I. 209 of 2015:

(3) The technical advice provided by the Central Competent Authority to a planning authority pursuant to paragraph (2) may be generic or case specific in nature and shall be so formulated that it will assist the planning authority to take into account the need, in the long term—

- (a) to maintain appropriate safety distances between establishments covered by these Regulations and residential areas, buildings and areas of public use, recreational areas, and, as far as possible, major transport routes;*
- (b) to protect areas of particular natural sensitivity or interest in the vicinity of establishments, where appropriate through appropriate safety distances or other relevant measures; and*
- (c) for the operator to take additional technical measures, in the case of existing establishments, in accordance with Regulation 7, so as not to increase the risks to human health and the environment.*

In giving its advice the Authority does not deal with routine emissions. Such emissions will be subject to EPA or Local Authority scrutiny and control.

The operator of an establishment covered by S.I. 209 of 2015 is also required to take all necessary measures to prevent major accidents occurring and to limit the consequences of any such major accidents for human health and the environment