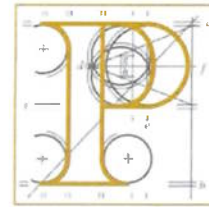


Our Case Number: ABP-317560-23



An
Bord
Pleanála

Leona Mulrooney & Others
Leafy Lane
Carroun
Castleconnor
Co. Sligo
F26CXK6

Date: 22 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.

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,

Lauren Murphy
Executive Officer
Direct Line: 01-8737275

PA09

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64 Sráid Maoilbhríde	64 Marlborough Street
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Honor Marren

From: Bord
Sent: Thursday, January 18, 2024 2:54 PM
To: SIDS
Subject: FW: ABP 317560-23
Attachments: Doc Jan 18, 2024, 14_09.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

From: leona mulrooney <[REDACTED]>
Sent: Thursday, January 18, 2024 2:34 PM
To: Bord <bord@pleanala.ie>
Subject: ABP 317560-23

Reply to Jennings O Donovan in relation to case ABP 317560-23

Thank you

Leona Mulrooney

Stephen Donegan

Ref: ABP 317 560-23

Leafy Lane,
Carraun,
Castleconar,
Co Sligo,
F26 CXKb.

House: HH5

We would like to highlight some of the short fallings within Jennings O'Donovan Consulting Engineers response to third party submissions and observations planning application Ref ABP 317 560-23.

We again would like to request an Oral-Hearing, in light of the many clarifications that are required.

We submitted our submission in good faith, outlining genuine concerns of why we are strongly opposed to the proposed development. Again, we feel deflated given the lack of clarity in the developer's response, with so many key issues been isolated. We feel many concerns have been ignored and side stepped.

"
Incorrect Labeling of Junctions'

L6612 is an entirely different junction 600m away. It is deeply concerning that this error may lead to huge confusion. Some experts may have inadvertently examined the wrong junction, throughout the preparation of the planning application. Evidence of this can be found on a TII document, a Sligo Co Co document (which was later corrected by council at a meeting 4 Sept. 2023)

Also, the error was made in comments on a submission referred to by Mercury Renewables.

This casts doubt in the level of research and proof reading that was carried out by developer.

Lack of clarity in relation to the truck size that is to be used for hydrogen. Smaller trucks will involve more truck traffic movements.

Information is very unclear and confusing as there is ~~no~~ mention of larger trucks combined with different numbers of trucks as the project scales up to 80MW. Smaller trucks will increase HGV volume, larger trucks will have potential challenges in exiting and entering the N59 at Junction L66121.

The length of HGV's that will transport hydrogen appears to be 15m, extracted from dimensioned drawings, but the Applicant does not specify/explain the fully laden weight of HGV or No. Axles?

Planning Statement pg. 3 States: "The wind farm will have an installed capacity of 78 MW. The Hydrogen Plant electrolyser will be scaled up to meet demand for green hydrogen in the Irish market to a maximum 80MW capacity. The 80MW electrolyser will produce a maximum of 31,200kg of green hydrogen per day, consuming the full wind farm output"

A maximum of 26 tube trailers is planned to take the hydrogen off site. Therefore each tube trailer takes just 1.2 tonnes of hydrogen.

The Applicant does not explain why a fully laden HGV is required for an apparently small load? Further Clarity is required.

Non-technical summary pg. 12 states: "The Seveso III Directive (Directive 2012/18/EU), and the chemical act (Control of major Accident Hazards involving Dangerous Substances) Regulations 2015, which implements the Seveso directive, apply to the Hydrogen Plant. The Hydrogen Plant is expected to be designated a lower-tier COMAH site, with no more than 30 tonnes of hydrogen on site at any time"

30 Tonnes is the equivalent of the maximum daily output of the Hydrogen Plant at full capacity so if there is any more than a day's delay in removing the hydrogen off site - for eg. inclement weather or major road traffic incident on the network etc. - operation will have to be cancelled until a resolution is resolved.

The adjacent town of Ballina, to the south of the Hydrogen Plant, has only one bridge crossing over the River Moy in either direction, with restricted turning circles. Within the town, narrow streets and one-way systems make it difficult to access the N26 towards Foxford or the N59 towards Crossmolina. The Applicant does not acknowledge the difficulties of this route nor the impact on an already heavily trafficked town during the published hours of HGV transport, (0700 - 1900).

- Swept Paths: Swept Path analysis if the company is so experienced, why the need to include detail to Ballisodare and none from Dromore West? There is no continuous Hard Shoulder on N59

Noise Pollution: A major concern hindering our Quality of Life. Noise from trucks is limited if quieter vehicles are used, but most of these trucks are not in mainstream production yet, again premature. We want specific Clarity on the exact levels of noise that is to be endured during Construction and operational phases.

Chapter 11 paragraph 11.3.2, "An Bord Pleanála Ref. number PL 16.241592.

(Planning register Reference Number: P 11/495" states: Carrowleagh Site 2013 (now referred to as Firlough Wind Farm) Planning permission was granted for this site by An Bord Pleanála for a 21 turbine Wind farm where, Condition 9 Stated:

"Noise levels emanating from the proposed development following commissioning when measured externally at a noise sensitive location shall not exceed the greater of 43 db(A) L90, or 5db(A) above background levels. If the noise contains a discrete, continuous note (whine, hiss, screech, hum etc.) or if there are distinct impulses in the noise (bangs, clicks, clatters or thumps), or if the noise is irregular enough in character to attract attention, a penalty of +5 db(A) shall be applied to the measured noise level and this increased level shall be used in assessing compliance with the specified levels.

All noise measurements shall be made in accordance with I.S.O Recommendations R1996/1 and 2 "Acoustics Description and measurement of Environmental noise" Recent 2022 An Bord Pleanála permissions for Wind Farms have included an additional limit of 40db(A)

L90 10 min below wind speeds of 5 m/s"
This last sentence is unclear, but seems to imply that a 40 dBA limit is imposed where wind speeds are less than 5 m/s, as opposed to 43 dBA at other times.

Analysis of Noise levels carried out from Wind turbines is extensive and Hydrogen Plant equipment in Chapter 11 and its Appendices. The EIA Guidelines (Section 3 page 30) advise that the applicant has to consider Noise, under sub-headings Daytime noise and Night time Noise.

Limits for Daytime and Night time noise energy, should be provided since 'receptors (ie people)' are more sensitive at night time.

Hydrogen Plant noise will also be affected indirectly as varying incoming power will impact the number of operational electrolyzers, compressors etc.

Within this analysis, noise levels should be set perhaps in terms of Unacceptable Adverse Effect level (UAEEL), Significant Observable Adverse Effect (SOAEEL) and Lowest Observable Adverse Effect (LOAEEL).

In addition one would have expected a full analysis of the three-pronged measures of Avoidance, Mitigation and Compensation. Chapter 11 paragraph 11.15.3 'Operational Noise Mitigation' states: All turbines will have STE fitted as industrial standard to reduce noise emission levels. No other mitigation is considered.

necessary." But Chapter 11 paragraph 11.6 states "In the unlikely event of a turbine exhibiting clearly tonal components at any receptor, the turbine would be turned down or stopped until such tonality is ameliorated" Clearly some additional mitigation is required

Constant monitoring of noise outputs must be carried out post construction, typically as part of a Noise Action Plan (NAP). There are no such proposals in this application, given its close proximity to family homes. (During Construction, noise sampling should be carried out to the criteria are set out in BS5228 - See Chapter 11 paragraph 11.12.8)

Post Construction for example, if noise occasionally exceeds ~~SOAEL~~ SOAEL, it may be necessary to shut down one or more turbines temporarily, if noise constantly exceeds SOAEL then compensation in the form of sound insulation, may be necessary.

Chapter 11 and its appendices do not provide this analysis in full. This analysis, and actions arising therefrom, are necessary because the Applicant - with the best will in the world - can only model the expected noise at this juncture. The actual noise levels at receptors both adjacent the Wind Farm and Hydrogen Plant will only become obvious after commencement of operations.

Levels of SAOEL etc. are typically EXTERNAL noise levels. Paragraph 11.11.2 advises "A 43 db(A) L90, 10 min limit protects sleep at night". The statement presumably refers to an external measurement (refer to Chapter 11 paragraph 11.3.1) and must make some assumptions in respect of building construction, façade orientation and glazing. The noise energy levels experienced by receptors indoors must also be assessed after construction to ensure that receptors are not disturbed, particularly at night as in summertime many receptors have to leave windows open, thereby eliminating most of the buildings noise attenuation. Chapter 11 paragraph 11.22.2 quotes the World Health Organisation limit for internal Night-time noise as 30 dBA continuous background, and individual exceedances to be less than 45 dBA.

Given that there was no Hydrogen Plant proposed as part of the granted planning permission it has been assumed that the applicant will apply the limits above to the Hydrogen Plant as well as the Wind Farm.

Hydrogen Plant Construction Noise:

Chapter 11 paragraph 11.26 states that: "There are number of mitigation measures to be incorporated into the design of the Hydrogen Plant as specified in Section 11.25.4.4." However there is no paragraph 11.25.4.4 but mitigation is set out in 11.27.4.4.

Chapter 11 Table 11.23 does not define where the 'construction activity' is to take place

The distance appears to be a measurement from the residence to the perimeter fence of the compound.

Table 11.23 does not include residence HH10 which is nearer the perimeter fence than HH14, by that measure. In addition, construction activities will be concentrated towards the west side of the site - main electrolyser building and water storage tanks. These will be nearer the N59 and consequently nearer residence HH15 (not included in the table) than HH12 or HH14.

Hydrogen Plant Operational Noise: A rough sketch

in A metal-clad Electrolyser building will be fitted

with insulation that - according to the Applicant - has a minimum RW of 35db. However, this is

a building some 130m long and 110m deep

and 16m high that will contain equipment with

an output noise level of 83dBA. Given that it

has doors, there are vents in the roof, and

given that this is a metal clad - building with

resonance potential, how can the applicant be

sure that 35db attenuation will be achieved?

Further Clarity is required!

The noise contour for the electrolyser building is

shown as 40dB yet with perfect insulation and

no resonance, this figure should be 83-35

= 48dBA !!

Noise assessments appear to be lacking in detail.
No plans to monitor noise continuously during operations.

Light Pollution: Our home HH5, newly built, F25CXK6, is 10m from Red line boundary. We farm the lands we own right up to Red line boundary. I would like to refer to our original submission and photos we included that show our young family, our enjoying nature walks, helping out on the farm, picking berries along Red line boundary and along our beautiful countryside, "deafy dare"

Industrial lighting, even low level lighting will be on a 24h schedule, lighting will be visible from our kitchen window. We left town and invested emotionally and financially in Country rural life. The location is unsuitable and the area needs to be protected.

4.13.2 - I would like to see the engagement that began with the Applicant and Mayo Dark Skies please? (4.13.2 Pg 153)
How movement sensors will work correctly with CCTV and wildlife preservation?

Land Zoning: - I have proof from Frank Moylan, Senior Planner, Sligo Co. Co via Email, stating that land for proposed Hydrogen Plant is unzoned. Therefore it is not zoned Industrial! I highlighted our concerns in original submission. We live in a quiet rural residential area that is unzoned, not zoned for Industrial / Commercial. I am deeply worried that a change of land usage will devalue our land

devalue property and may effect future planning permissions been granted for our family on sites in close proximity to proposed Hydrogen Plant. Again I am seeking Clarity / Confirmation that this proposed development won't effect / devalue land / property? How will Home Insurance be effected? We would be obliged to inform Our Insurance company of such a development / Industrial Plant imposing on us? As this is a quiet, agricultural area we have deep, genuine concerns. - Please find attached letter from experienced Auctioneer / Valuer Billy Heffron Estate Agent / Ballina, Co Mayo, in his experienced professional ^{opinion} Land / property would be devalued. This is unfair and Heart breaking to even imagine.

- Creation of Wetlands at proposed Hydrogen Plant site, it does not seem to include specific drawings / maps of Constructed Wetlands? How would these wetlands effect our land, property and crops? What precautions and ongoing monitoring is proposed to take place?

Risk Assessment: The quantitative Risk alx only considers Humans in Houses. There is no regard of the HH houses using their Land for work or recreational purposes. To this end workers on farm HH adjacent to the Hydrogen Plant are not factored in the alx. Family in HH not counted at all. There appears to be a false impression given that only one person could be effected in the event of an explosion

But one life is one too many. It is not okay to endanger any life with this project.

We are seeking clarity on Set Back and Blast range distances from our Home HHS?

There appears to be little to no legislation in place in Ireland, in relation to Hydrogen Plants, again gives it's prematurity.

Pg 18, paragraph three, states "To account for the 90% occupancy indoors and 10% occupancy outdoors, the vulnerabilities for the Step Functions (indoor + outdoors) have been weighted by the occupancy factor to derive a single set of vulnerability levels. This enables presentation into an individual risk contour in 'Safeti'". Surely this does not indicate we spend 90% of time inside! We spend 6-8° outside during the day, more during summer, looking after live stock.

Pg 44, Paragraph two :- "There will therefore be no children close to the Hydrogen Plant Site". Children pass the Hydrogen Plant site proposed entrance daily, walking, cycling, School Collection, trekking ponies.

"Security Fencing" Pg 144 Paragraph two, would destroy our landscape, ~~and degrade~~ The Risk of the extra traffic volume / frequency would hinder safety to our children and all road users. It appears the applicant has not addressed any impact of Hyd. Plant under low prevailing wind for Residents.

Visual Impact. We were very concerned that there were no physical profiles erected for proposed Hydrogen Plant. The video on Mercury Renewables website portrays an image

• Of a farm Style Shed building. It appears to be misleading to the public as the size/Scale is misleading.

The photo montages appear unprofessional given the scale of the project, images appear with the Wing mirror of a Car.

The Photo montages of the Hydrogen Plant^s don't take into consideration the revised topography of the site. The Western Elevation of the current site is approx 52m' above ordance datum (AOD) at the northernmost end, falling to 44m at the southernmost end. The site is due to be re-profiled so that its 'ground' level is 49m AOD which means the southern end will sit on a bank some 5m higher than the present landscape.

The Photo montages do not appear to present a true image of the Installation.

Furthermore, the proposed Hydrogen Plant photo montage gains some screening, but it is not clear what form this will take, and if screening is compromised of trees, will they be

mature trees as opposed to saplings and where they will be planted - at the top or bottom of bank.

• Elevation drawings appear to fail to take into account the re-profiling of the Hydrogen Plant size.

Water Concerns - We are deeply concerned about our water supply, pressure and quality.

Applicant states they will rely on mains water as backup, this is a worry.

Communication: I feel disheartened that it was myself that had to instigate the first point of contact with the developer. I did not receive any newsletter, personal letter, notifications to inform us of development or drilling for water and disturbance that we endured! We were not informed that 546 hours of Water Well drilling was going to occur, ~~approx~~ in very close proximity to our newly built home - No Notification, no Consideration, No Signage. Please find photos in my original submission, showing close proximity - Our daughter, a toddler at the time, crying and frightened with the excessive noise and ground vibrations. It should have been a happy time, moving into our dream home, that we built and worked so hard for, instead it was railroaded with fear and disturbance. No regard was shown for local residents or livestock it was deeply traumatic, I feel that is accurate to say traumatic, we endured sleepless nights due to worry of what would happen next. Drilling often started at 1800 - 2200 at night, leaving us powerless, vulnerable and sleep deprived.

It appears no regard for Sligo Co Co Authority as Mark Cummins, a / Senior Executive Engineer, Planning Enforcement + Building Control, Sligo Co. Co, served the developer an Enforcement notice to have an Illegal / unauthorised roadway removed, that they constructed through the land of proposed Hydrogen Plant location. We have proof of

this via Email from Mark Cummins,
confirming the incident.

- Also, We have proof that it appears the
developer / Mercury Renewables had not yet
submitted a Fire Safety Cert (FSC) in
accordance with Section 11 of the building
Control Reg 1997 as ammended.
Confirmed via Email 31/8/23, Kevin McGorrey
Senior Assistant Chief Fire Officer.

- We were not invired to stakeholders / Neighbours
meeting: 25th May 2023, that was held in our local
~~pub~~ pub! Attendee's appear to have been
hand picked!

We would like to bring your attention to our
original submission, Nothing has changed we
are still opposed to the proposed development
for many valid reasons. We want to protect
and futureproof deafy done, our home and the
beauty and nature that surrounds us. We
followed rigorous Planning regulations, we have
never been opposed to any previous developments,
we feel the location is unsuitable and excessive
traffic movements of HGV's and abnormal loads
would be high risk to human health and
safety. I have worked on the Front Line
in Emergency situations over 15 years and
this proposed development sends alarm bells
off! 7.4km to the nearest Fire Station,
5.5km to the nearest ED and Acute Hospital.
Frequent Gorse Fires on the nearby bogs are
all valid and important points / risks to Reject Project.

As stated in many submissions the realisation that this project is premature and market not established. It appears there is no funding statement, therefore this project can not be assessed in relation to its viability.

Has the developer produced plans to deal with a fluctuating energy supply to the hydrogen plant?

In my opinion there is a high risk of "Project Split" planning permission would give the applicant the right to build the wind farm and Hydrogen Plant, but he is under no legal obligation to build the hydrogen plant.

Given the total absence of any quantitative analysis and the variable output from the Hydrogen Plant the developer could concentrate on feed-in tariffs to Eir Grid and not have the hassle of funding the building of a Hydrogen Plant, that has little to gain except to use the prospect to increase the chance of obtaining Planning permission under the guise of helping to achieve Net Zero, this is only my opinion and outlook.

- Can the Applicant point / highlight to a single other installation that uses Wind Farm output to power a Hydrogen Plant and the electricity Grid?

If not, this is a research and development project that carries significant technical and economic risks. It certainly appears to be a developers project!

Incorrect Information about / regarding our lands in Public Domain:- It would appear the applicant states land owner, Job no. 6129 / drawing number 6129-PL-121, that these are "under control by the Applicant" (Fig 3-8) This information is incorrect, we are the Land owners of d66121 and d6612 (my field is @ Jundion of these Rds) (leafy done) (Knockbrack Rd.)

We can confirm we have not been consulted by the applicant to this assumption, that we give permission to applicant re: blue line (Legend) along our land, it will not be partaking in proposed development.

This leaves us feeling worried, concerned as incorrect information has been circulated in the public domain.

We are seeking an urgent explanation from the applicant to address this matter, also have it rectified / removed from document.

- We have always maintained the vegetation of our land, we do not permit any tree cutting along our home or lands.

- We maintain the vegetation in keeping with wildlife, funded by our family.

- A proposed underground could be detrimental to the wildflowers along leafy lane d66121.

- We own land both sides of the road, which is confirmed in my father's submission Patrick Donegan. We do not give permission to any Road widening or digging up the road to facilitate underground cabling.

Signed :-

Leona McLooney

A. Donegan

Cecile Donegan

17/01/2024.