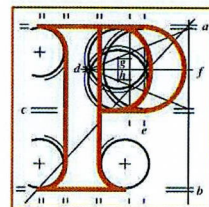


Our Case Number: ABP-317560-23



**An
Bord
Pleanála**

Theresa and Padraic Morrell
Carraun
Corbally
Co. Sligo
F26N156

Date: 06 September 2023

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 recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

The Board will revert to you in due course with regard to the 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,

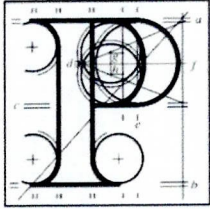
Lauren Murphy
Lauren Murphy
Executive Officer
Direct Line: 01-8737275

PA04

Tel
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel (01) 858 8100
LoCall 1800 275 175
Fax (01) 872 2684
Website www.pleanala.ie
Email bord@pleanala.ie

64 Sráid Maoilbhríde 64 Marlborough Street
Baile Átha Cliath 1 Dublin 1
D01 V902 D01 V902



An
Bord
Pleanála

Observation on a Strategic Infrastructure Development Application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's
name

Theresa & Padraic Morrell

(b) Observer's
postal address

Carraun, Corballa, Co. Sligo. F26N156

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

N/A

(b) Agent's postal
address

N/A

AN BORD PLEANÁLA	
LDG-	<u>066218-23</u>
ABP-	
01 SEP 2023	
Fee: €	<u>50</u> Type: <u>CASH</u>
Time: <u>12:41</u>	Page <u>1</u> of <u>10</u> By: <u>hand</u>

Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

☒

The agent at the postal address in Part 2

☐

Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Bord Pleanála case number for the current application (if available)**
(for example: 300000)

PA16.317560

- (b) **Name or description of proposed development**

Proposed windfarm development including 13 # wind turbines in
Bunnyconnellan, Co. Mayo & hydrogen plant in Castleconnor, Co. Sligo

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Carrowleagh, Bunnyconnellan, Co. Mayo & Curraun, Castleconnor, Co. Sligo

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word** limit as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

Our home is situated only 200 metres from the nearest point of the red line boundary of the proposed plant, therefore our property will be very near the proposed Hydrogen plant buildings. We have many concerns over this proposed development, and have never been contacted by Mercury Renewables in any way over this proposal even though we will be extremely close to it should it proceed.



The photo above taken from the N59 shows the current 120 metre tall turbines. The proposed turbines are 180 metres tall, and will be situated nearer our property.

5. Grounds

Safety Concerns

Mercury Renewables have never constructed and operated a hydrogen production plant before, and because of the massive scale of their proposals, we are very concerned about their knowledge and capabilities in doing so.

In most cases in industry, hydrogen is usually produced and used at the same location, thus eliminating transport costs and the extreme transport dangers. We have Health & Safety concerns due to the location in a residential area on the outskirts of Ballina Town and nearby Enniscrone. Hydrogen plants are a premature development in Ireland as there is no EIAR (Environmental Impact Assessment Report) completed as yet on the Hydrogen Strategy which would determine the guidelines of the obvious need for safety regulations in dealing with such a dangerous chemical. The treatment, storage and transportation of the manufactured hydrogen is a huge worry to us. During initial operations, it is proposed that the gas will be transported by road in tube trailers, of which there will be a maximum of 26 loaded tube trailers leaving the facility every day starting at 7am until 7pm, but there is conflicting information regarding these times because when the plant is phased up and production increases dramatically, what happens then, as they state that there will only be a small storage capacity on site? The initial operation equates to 52 movements per day. Distributed over a 12 hour period this is comparable to 4.3 movements per hour, which is roughly a fully loaded tube trailer lorry leaving every 15 minutes.

We are also concerned about the amount of hydrogen that may be stored on site and the huge responsibility of managing and monitoring it, and also the safety provisions for storing any excess hydrogen produced. The emergency fire services in Ballina & Enniscrone are ill equipped to deal with any large-scale fires, leakage or explosion regarding hydrogen both onsite, and during transport. Accidental Hydrogen combustion requires very specialist equipment and operation to deal with a situation. This would require the local fire services to be fully equipped and trained in the extreme dangers of unforeseeable hydrogen accident situations. With all due respect, the local fire services neither have the funds, manpower or experience to deal with such a situation.

Environment

The usage of water from the aquifer and mains supply, means that over a period of time in the ongoing operation of this project, that long term water pumping of a massive volume of over 70 million litres of groundwater a year raises the question of the possibility to seriously deplete the aquifer causing untold effects to the surroundings. This area contains forestry, bog lands and agricultural lands with many farms in the area depending solely on sunken wells and natural water sources. A depletion of the water table would be disastrous to the ecology and manageability of these areas. We are worried that this possible depletion could undermine the ground structure that could eventually lead to subsidence causing property damage or even sink holes. Should this be the case, it would be impossible for us and others to get insurance on our properties or at the least, it could lead to very high risk premiums. Therefore, we would require under the precautionary principle that Mercury Renewables prove without any doubt that water levels in the aquifer will never be depleted due to their actions, and take full financial responsibility should it ever occur. We are also extremely concerned about potential impacts on the environment. As the plant will operate 24/7, there will likely be considerable light pollution in the area at night.

The planning application is not clear in relation to water storage or the amounts of discharge, and how this plant will affect the groundwater in the area. Ultimately excessive water loss

5. Grounds

could impact the Dooyeaghny, and Brusna rivers nearby and wildlife therein, protected under the Habitats Directive. The composition of the proposed discharge is not clearly laid out in the proposal, and the types of domestic effluent does not appear to have been incorporated into the final discharge composition.

The Dooyeaghny River, flows directly across from our gate, and is adjacent to the L6611, and it follows the road down to exit into the river Moy. This will be the destination for all openly discharged effluent from the plant. The Dooyeaghny River flows closely to the proposed plant, and it was not tested to the same degree as other streams in the area for fish habitation namely Salmon Spawning. This should have been done and included as the discharge point from the plant flows directly into the Dooyeaghny river. The possibility of effects to wildlife due to pollution from possible chemical discharge must be considered.

Castleconnor & The Surrounding Area

The rural area of Castleconnor is not zoned for industry, and neither should it be. This proposed change in land usage combined with a proposed chemical hydrogen production plant will seriously de-value property in the area, and due to its hazardous produce, we may have difficulty in getting future planning permission due to its locality. The locality is also steeped in history, and our area contains many sites of historical interest and is home to many Archaeological sites going back centuries.

The N59

The N59 is a busy highway mostly built on bog land. It undergoes a lot of resurfacing and subsequently it is prone to sections of the road being closed. If this happens, where will the trailer trucks from the plant be diverted to, and will these routes be suitable for HGV's drawing hazardous gas?



The section of road on which the proposed access to the Hydrogen plant is to be situated is particularly dangerous because the proposed entrance is in a hollow and is part of a 'staggered junction' incorporating the L6611 and the L6612 which join the N59 on either side.

This photo shows the view from the junction of the L6612 with the Junction of the L6611 on the right.

There have already been many accidents on this stretch of road. There is also a spring water well at the junction of L6611, and many people draw fresh water from this spring, whilst doing so, they park their cars at the turn there.

Both approaches to this staggered junction incorporate a downhill gradient which could cause a major problem for HGV's slowing to take the turn into the L6612 at the plant entrance.

5. Grounds

This photo shows the junction of the L6612 on the left, the proposed entrance to the site.

As can be seen in the photo, due to the width of the road at this junction, any HGV turning in or out of the proposed L6612 site entrance would have to 'swing out' and cross over into the oncoming lane to make the turn, and if the L6612 was widened, it would bring both junctions closer and even more in line with each other, causing an even more dangerous traffic hazard.

HGV's, especially articulated and pulling trailers, have to use gears to establish speed travelling up an incline, and likewise to slow down on a downward incline, therefore HGVs drawing hydrogen trailers, travelling on the N59 from the turn at the L6612 in any direction, will be louder when they are slowly leaving or approaching the L6612 junction, and the resulting noise and vibration will be very intrusive for local residents.

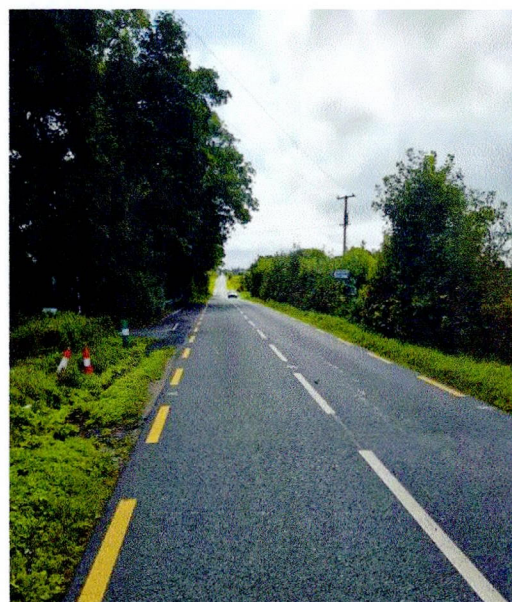
If this proposal goes ahead, with 52 HGV's entering and exiting the site, there will be a considerable increase in risk as not only will there be a large number of HGV's turning in and out every day, there will also be many other service and employees vehicles using the junction. This has the potential to cause a substantial increase in accidents.

Future Changes Planned

As stated earlier there will be a maximum of 26 loaded tanker lorries carrying a total of 4 Metric Tonnes of hydrogen leaving the facility every day. But it must be noted that this is when the plant is operating the smallest initial batch with a 10MW electrolyser capacity. It is intended to phase up to an 80MW electrolyser which is capable of producing 31.2 Metric Tonnes daily! This will vastly increase the amount of HGV movements per day. When this happens, this site will be in operation 24/7 and movement of trucks will have a massive detrimental impact in the area and road infrastructure. There is also reference to the use of larger HGVs although not currently available, is it then correct to assume, that in the absence of these, that traffic movement will be double of that which is estimated?

Is There Market For Hydrogen?

The Republic of Ireland's Hydrogen usage is only 2,000 tonnes. If the projected production targets claimed in the proposal are met, there will be a massive excess which will need to be stored, transported and exported. Taking into account that there are other plants proposed elsewhere, why do we suddenly need so much hydrogen when our country's usage is so low? Mercury Renewables have announced that they want to attract industry to the area and that the availability of hydrogen in the area will help them to do so, but nobody has asked anyone in the area if that is what they want. Ours is a renowned area for tourist and natural heritage destination for many and we do not want this region to become an industrial area, and we don't want to be monopolised by private companies to exploit our natural resources



Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

Oral hearing request

8. If you wish to [request the Board to hold an oral hearing](#), please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

☐

No, I do not wish to request an oral hearing

☐

Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.