

The Secretary An Bord Pleanála 64 Marlborough St. Dublin 1 D01 V902

by e.mail; sids@pleanala.ie

Dáta | Date 10 November, 2023

Ár dTag|Our Ref. TII23-122539

Re. Strategic Infrastructure Development - Proposed development of Oweninny Wind Farm Phase 3 consisting of 18 wind turbines, Co. Mayo

ABP Case ref. PA16.316178

Dear Secretary,

TII acknowledges receipt of referral of Significant Additional Information submitted in relation to the above proposed Electricity Development Application on behalf of Bord na Mona Energy Ltd.

TII notes that the Report by Tobin Consulting Engineers submitted with correspondence dated 25 July, 2023, included with the Significant Additional Information Response addresses observations provided by TII in the Authority's initial submission on this application of 18 May, 2023.

Notwithstanding the responses outlined in the Significant Additional Information, it remains the position that the subject site accesses directly to the N59, national road, and represents a direct private access to the N59 at a location on the national road subject to a 100kph speed limit. Section 3.5.1 of the EIAR outlines that the proposed access will be the main construction entrance to the site and will facilitate both materials delivery to the site (stone, steel and concrete) as well as large oversize components such as turbine and substation components. In addition, it is noted that the access to the N59, national road, also provides access to the visitors area and access to the amenity trail.

The Board will be aware that official policy concerning development management and access to national roads is outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

Section 2.5 of the DoECLG Guidelines sets out policy that seeks to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses (i.e. non-public road access) to national roads, to which speed limits greater than 50 kph apply. This policy position is reflected in the provisions of the Mayo County Development Plan, 2022 – 2028; Policy MTP 23 and Policy MTP 24 both refer.

Having regard to the foregoing, TII respectfully requests that the Board consider the access proposals to the N59, national road, in the context of the provisions of official policy and the intensification of use that might arise, to ensure road safety for all road users and adherence to the provisions of official policy.

> Próiseálann BlÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag www.tii.ie. TII processes personal data in accordance with its Data Protection Notice available at www.tii.ie.













In relation to the other matters raised in TII's initial submission, it is noted that the Significant Additional Information Response includes clarification in relation to;

- the requirement for permits for any abnormal loads,
- appropriate Road Safety Audit,
- assessment of structures on the haul route in the event of abnormal loads, and
- consent from MMaRC and PPP where relevant.

TII welcomes the clarifications provided in the Significant Additional Information Response provided by Tobin Consulting Engineers on behalf of Bord na Mona Energy Ltd. and accordingly, the position of TII remains as set out in the Authority's initial submission of 18 May, 2023.

The Authority trusts that the foregoing comments prove of assistance to the Board in dealing with this matter.

Yours sincerely,

Michael McCormack Senior Land Use Planner