



Transport Infrastructure Ireland  
Michael McCormack  
Parkgate Business Centre  
Parkgate Street  
Dublin 8  
D08 DK10

**Date:** 19 May 2023

**Re:** Proposed development of Oweninny Wind Farm Phase 3 consisting of 18 wind turbines.  
Within the townlands of Laghtanvack, Croaghaun (also known as Croaghaun West), Moneynieran, Corvoderry, Shanvolahan, Dooleg More, Shranakilly, Bellacorrick and Shanvodinnaun, Co. Mayo

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](http://www.pleanala.ie).

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

**Sarah Caulfield**  
Executive Officer  
Direct Line: 01-8737287

PA09

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The Secretary  
An Bord Pleanála  
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D01 V902

by e.mail; sids@pleanala.ie

Dáta | Date  
18 May, 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,

The Authority acknowledges receipt of referral of the above Strategic Infrastructure Development application on behalf of Bord na Mona Energy Ltd and provides the following observations for the Boards consideration.

It is proposed to address the proposed development in relation to the provisions of official policy and in relation to national road network maintenance and safety.

#### 1. Official Policy

Section 3.4.2 'Site Roads' of the EIAR confirms that the proposed development site will be accessed via the N59 road using the existing operational entrance for Oweninny Wind Farm Phase 1.

The subject site access directly to the N59, national road, 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 BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag [www.tii.ie](http://www.tii.ie).  
TII processes personal data in accordance with its Data Protection Notice available at [www.tii.ie](http://www.tii.ie).



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## **2. National Road Network Maintenance and Safety**

In addition to the above, there are a number of operational issues related to the subject windfarm development proposal, in the Authority's opinion, that are required to be resolved to address concerns relating to network maintenance and road safety prior to any decision on this planning application.

### **2.1 Proposed Turbine Haul Route**

Section 17.2.4.2.2 of the EIAR addresses the transportation of components associated with the subject development. An Abnormal Indivisible Load (AIL) Haul Route with a number of ports of entry and associated routes to site are considered in the assessment. The Haul Route Assessment is supported by a Haul Route Swept Path Analysis included as Appendix 17.1 of the EIAR and a number of temporary works measures to accommodate turbine component delivery to site are identified, some that are related to the national road network.

The national road network being traversed is managed by a combination of PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities.

The applicant/developer should consult with all PPP Companies, MMaRC Contractors and road authorities over which the haul route traverses to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is maintained.

Where temporary works within any MMaRC Contract Boundary are required to facilitate the transport of turbine components to site, the applicant/developer shall contact [thirdpartyworks@tii.ie](mailto:thirdpartyworks@tii.ie) in advance, as a works specific Deed of Indemnity will be needed by TII before the works can take place.

Any proposed works to the national road network to facilitate turbine component delivery to site shall comply with TII Publications and shall be subject to Road Safety Audit as appropriate. Works should ensure the ongoing safety for all road users and prior to any development necessary licenses, approvals or agreements with PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) Companies and local road authorities, as necessary, shall be in place.

TII requests referral of all proposals agreed between the road authority, PPP Concessions and MMaRC Companies and the applicant impacting on national roads. Mitigation measures identified by the applicant should be included as conditions in any decision to grant permission.

Any damage caused to the pavement of the existing national road due to the turning movement of abnormal 'length' loads (eg. tearing of the surface course) shall be rectified in accordance with TII Pavement Standards and details in this regard shall be agreed with the Road Authority prior to the commencement of any development on site.

### **2.2 Structures on Haul Route**

It does not appear that the EIAR confirms whether abnormal weight loads are a feature of the proposed development, for example turbine component delivery vehicles or those deliveries associated with substation components.

Any operator who wants to transport a vehicle or load whose weight falls outside the limits allowed by the Road Traffic (Construction Equipment & Use of Vehicles) Regulations 2003, SI 5 of 2003, must obtain a permit for its movement from each Local Authority through whose jurisdiction the vehicle shall travel. With specific reference to national road structures on the proposed haul route, all structures should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal load proposed.

The Authority has reviewed the EIAR documentation referred and is concerned that no technical load assessment of structures appears to have been undertaken in support of this proposed development. However, it is acknowledged that abnormal weight loads may not be a feature of the proposed development.

The Authority considers that it is critical that a full assessment by the applicant/developer of all structures on the national road network along the haul route should be undertaken, where relevant, to confirm that all structures

can accommodate the proposed loading associated with the delivery of turbine and substation components to site where the weight of the delivery vehicle and load exceeds that permissible under the Road Traffic Regulations.

The Authority requests referral of all proposals agreed between the road authorities and the applicant impacting on national roads.

### **2.3 Grid Connection Routing**

Section 17.1.4 of the EIAR outlines all works associated with the connection of the proposed wind farm to the national electricity grid, including a 110kV underground electrical cable from the proposed on-site electrical substation to the existing sub-station at Bellacorick across peat lands with 1 no. road crossing of the L52925.

TII notes that there are no interactions with the national road network to address.

### **2.4 Greenways**

In relation to any Greenway proposals in the vicinity of the proposed works, consultation with Mayo County Councils own internal project and/or design staff is recommended.

### **Conclusion**

It is requested that the above matters are taken into consideration prior to any decision on the subject application.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michael McCormack', is written over a horizontal line.

Michael McCormack  
Senior Land Use Planner