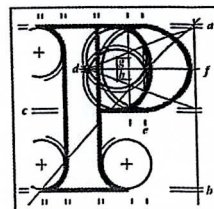


Our Case Number: ABP-317560-23



**An
Bord
Pleanála**

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

Date: 04 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.

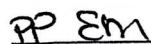
The Board will revert to you in due course with regard to the matter.

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
Executive Officer
Direct Line: 01-8737275

PA04

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Lauren Murphy

From: Landuse Planning <LandUsePlanning@tii.ie>
Sent: Wednesday 30 August 2023 10:17
To: SIDS
Subject: ABP Case ref. PA16.317560 (Mercury Renewable (Carrowleagh) Limited)
Attachments: PA16.317560.pdf

Dear Sir/Madam,

Please find attached a copy of TII's observations on the above Strategic Infrastructure Development Application.

Yours sincerely,
Michael McCormack
Senior Land Use Planner

In accordance with TII's Right to Disconnect policy, if you are receiving this email outside of normal working hours, I do not expect a response or action outside of your own working hours unless it is clearly noted as requiring urgent attention.

De réir pholasáí BIÉ An Ceart gan a bheith Ceangailte, má tá an ríomhphost seo á fháil agat lasmuigh de na gnáthuaireanta oibre, nílím ag súil le freagra ná le gníomh uait lasmuigh de do ghnáthuaireanta oibre féin mura bhfuil sé ráite go soiléir go bhfuil gá gníomhú go práinneach.

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Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag <https://www.tii.ie/about/about-tii/Data-Protection/?set-lang=ga>

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Córas r-phoist BIE: Tá an ríomhphost seo agus aon chomhaid a tharchuirtear leis faoi rún agus beartaithe lena n-úsáid ag an duine aonair nó ag an eintiteas a bhfuil siad dírithe chuige/chuici amháin. Más rud é go bhfuair tú an ríomhphost seo trí bhotún, cuir sin in iúil do postmaster@tii.ie, le do thoil, agus scríos an ríomhphost bunaidh agus aon cheangaltáin.

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

by e.mail; sids@pleanala.ie

Dáta | Date
30 August, 2023

Ár dTag | Our Ref.
TII23-123905

Re. **Strategic Infrastructure Development – Proposed windfarm development including 13 no. wind turbines in Bunnyconnellan, Co. Mayo & hydrogen plant in Castleconnor, Co. Sligo (ABP Case ref. PA16.317560)**

Dear Secretary,

The Authority acknowledges receipt of referral of the above proposed Strategic Infrastructure Development Application on behalf of Mercury Renewable (Carrowleagh) Limited.

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

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.

In that regard, the Authority acknowledges that access to all turbine locations and the proposed hydrogen plant is facilitated via local road junctions with the N59, national road, in the first instance.

Notwithstanding, it is noted that the application proposes realignment of the national road junction N59 with local road L66121 as detailed in drawing number 6129-PL-121. The alterations proposed to the N59 national road junction require the submission of a Design Report in accordance with TII Publications requirements.

The Board will be aware that TII has a range of specific functions under The Roads Act 1993 (as amended) to support the general function of providing a safe and efficient national road network. Specifically relevant to this Strategic Infrastructure Development application and in particular the proposed alterations to the N59/L66121 junction, Section 19(1)(e) provides the authority to TII to specify standards in relation to design, construction or maintenance works to be complied with by a person, road authority or public authority carrying out works to a national road. Such standards are set out in the suite of technical design standards collectively referenced as TII Publications.

TII has no record that a Design Report has been submitted in relation to the proposed alterations to the N59 Junction with the L66121. TII Acceptance of a Design Report is required as set out in TII Publication GN_GEO_03030 (www.tiipublications.ie). TII considers that this matter should be resolved in advance of any decision on the

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application in the interests of road user safety and to ensure appropriate design and safety standards are applied to the proposed development and can be reflected in conditions of any decision to grant permission.

2. National Road Network Maintenance and Safety

In addition to the above, there are a number of operational issues related to the subject windfarm and hydrogen plant 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

In relation to the proposed Turbine Component delivery to site, Section 15.5.4 of the EIAR outlines the Turbine Component Haul Route to site from the ports of entry at Killybegs and Galway Port. Appendix 15.1 (A & B) contain turbine delivery haul route assessments and outline proposed temporary works impacting the national road network.

The national road network 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 routes traverse to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is maintained.

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, permits 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 Abnormal Weight Loads

While abnormal 'oversized' loads are addressed in the EIAR in the context of turbine component haul route proposals, no details appear to be included in the EIAR related to abnormal 'weight' loads.

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.

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

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 application. However, it is acknowledged that abnormal weight loads may not be a feature of the proposed development.

The Authority considers that it is critical 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 associated development

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

The Grid Connection Route is detailed in Figure 2.9 and it is noted that there are no interactions with the strategic national road network.

2.4 Greenways

In relation to any Greenway or Active Travel proposals in the vicinity of the proposed works, consultation with Mayo and Sligo 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