

**TII submission to Proposed windfarm development at Lemanaghan and surrounding townlands
- An Coimisiún Pleanála - Case reference: ACP ref. PAX19.324161_TII ref. TII23-135837**

From Landuse Planning <LandUsePlanning@tii.ie>

Date Fri 5/22/2026 2:04 PM

To SIDS <sids@pleanala.ie>

 1 attachment (312 KB)

TII26-135837 - SID application for Proposed Lemanaghan Wind Farm Co. Offaly ACP ref. PAX19.324161_issued 22.05.2026.pdf;

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Dear Sir/Madam,

Please find attached a copy of TII's observation on the above application.

Please acknowledge receipt of this submission.

Acknowledgements can be forwarded to landuseplanning@tii.ie.

Regards and thanks,

Cliona Ryan

Land Use Planner

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Email: landuseplanning@tii.ie



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**An Coimisiún Pleanála
(Strategic Infrastructure Division)
64 Marlborough Street
Dublin 1**

By email: sids@pleanala.ie

Dáta | Date

22 May 2026

Ár dTag | Our Ref.

TII26-135837

Bhur dTag | Your Ref.

PAX19.324161

RE: Proposed development of 15 no. wind turbines, a permanent 220kV on-site substation, and associated infrastructure located at Lemanaghan and surrounding townlands, Co. Offaly.

Applicant: Lemanaghan Wind Farm DAC (Active)

Dear Sir /Madam,

Transport Infrastructure Ireland (TII) acknowledges receipt of referral of the above proposed windfarm, grid connection and turbine delivery route application on behalf of Lemanaghan Wind Farm DAC (Active).

TII welcomes and is supportive of proposals aimed at achieving *Project Ireland 2040* National Strategic Outcomes (NSO) including *NSO 8 Transition to a Low Carbon and Climate Resilient Society* and *NSO 9 Sustainable Management of Water and other Environmental Resources*. TII consider that individual projects should proceed where they are complementary to the requirements of official policy set out in the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) concerning maintaining the strategic capacity and safety of the national road network in accordance with *NSO 2 Enhanced Regional Accessibility*.

TII's submission seeks to address the safety, capacity, and strategic function of the national road network with TII's statutory functions, and the provisions of official policy. This submission identifies the interactions of the proposed project with the national road network, sets out potential impacts arising and identifies appropriate revisions and mitigations for the proposed project to proceed complementary to the maintenance of the safe and efficient operation of the national road network which require resolution for the Commission's consideration:

1. Direct access to the national road network where a 100 kph Speed Limit applies

TII observes that the proposed development includes in the description of development element "(xvii) 3 no. permanent amenity car parks each including 15 no. spaces for private vehicles, 3 no. spaces for accessible carparking, parking for buses and bicycle rack facilities".

TII is seriously concerned that one “*amenity car park*” is indicated to be accessed directly from the N62 at a location where the maximum 100kph speed limit applies which is in contravention of official national roads policy and contrary to road user safety and the safety of the public generally.

Section 2.5 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) 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. The policy set out in Section 2.5 of the DoECLG Guidelines is directly reflected in the Offaly County Development Plan 2021 – 2027 for the national road network:

Offaly County Development Plan, *Chapter 8 Sustainable Transport Strategy, Section 8.8 Sustainable Transport Strategy Policies for Roads* includes the following policies:

“SMAP-24 *It is Council policy to maintain and protect the safety, strategic transport function, capacity and efficiency of national roads, motorways and associated junctions and in accordance with Strategic Planning and National Roads Guidelines 2012 or any subsequent edition.”*

“SMAP-25 *It is Council policy that development(s) requiring a new direct access or an intensification of an existing access onto a National Secondary road, or onto a privately owned road leading onto a National Secondary road where a speed limit greater than 60 km/h applies will be avoided in accordance with the provisions of Spatial Planning and National Roads Guidelines for Planning Authorities, January 2012. Exceptional circumstances may be considered where the development is of national and regional strategic importance, is plan-led and complies with the criteria set out in the Spatial Planning and National Roads Guidelines in this regard.”*

The Commission is advised that the current Offaly County Development Plan does not provide any agreed “*exceptional circumstances*” cases for development accessing a national road such as that currently proposed. The Authority also highlights that identification and agreement of “*exceptional circumstances*” must be undertaken in accordance with *Chapter 2 Development Planning and Roads*, Section 2.6 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) a part of forward planning processes by the planning authority in the formulation of statutory development plans not on a case by case basis as part of the development management process.

The aforementioned policy considerations clearly advocate great care must be taken and demonstrated with the introduction of any alteration to national road infrastructure, even during temporary periods, having regard to TII Publications compliance and in the interests of public and road user safety.

TII would also highlight that the Road Safety Authority’s *Our Journey Towards Vision Zero Ireland’s Government Road Safety Strategy, 2021 – 2030*, indicates that the Safe System approach emphasises the need to focus on all elements of the road traffic system to successfully improve road safety. The Road Safety Authority’s (RSA) *Our Journey Towards Vision Zero Ireland’s Government Road Safety Strategy, 2021 – 2030*, indicates that the ‘Safe System’ approach emphasises the need to focus on all elements of the road traffic system to successfully improve road safety. The first of the seven areas of intervention of Safe System approach is safe roads and roadsides to improve the protective quality of our roads and infrastructure.

TII provided two EIAR Scoping responses exhibited in “*Appendix 2-1 Scoping Responses*” of the submitted EIAR. Both highlighted the location of the proposed development adjoining the N62 where the maximum speed limit applies and the need to resolve official national roads policy and safety consideration in any subsequent application “*including in relation to any future associated amenity uses*”.

TII's submission for the substitute consent application for Lemanaghan Bog, Co. Offaly Ref. ACP-323676-25 (TII ref. TII25-134573) in February 2026 similarly advised that prospective development at the site should not result in any intensification of use of the existing direct access to the N62, above permitted levels of use, in accordance with the provisions of the *Spatial Planning and National Roads Guidelines for Planning Authorities*.

In 2025 TII made submissions to the "*Offaly West Trail Network*" as named on submitted site layouts and permitted under Offaly County Council Reg. Ref. 2560014. The "*Offaly West Trail Network*" lands are opposite the current project site on the western side of the N62. TII highlights that in response to the above policy provisions as condition no. 4 of the grant of permission for the "*Offaly West Trail Network*" under Offaly County Council Reg. Ref. 2560014 there is no access to the permitted trail from the N62.

TII observes the proposed utilisation of the access from the N62 for temporary construction access purposes and as part of associated activity such as the proposed turbine delivery route. We also acknowledge the March 2026 submission of a Design Report to TII departures portal in accordance with the requirements of TII Publication *DN-GEO-03030 - Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes*.

In consideration of the foregoing, TII reiterates its concern that one "*amenity car park*" remains indicated to be accessed directly from the N62, as opposed to a temporary, monitored and limited private construction entrance, at a location where the maximum 100kph speed limit applies. This also conflicts with The Authority's concern arising having regard to the nature of the proposed associated amenity entrance which will attract public multimodal usage which is contrary to the provisions of official national roads policy, and more critically to safety of visitors and users generally.

In order to address the deviation from relevant *Spatial Planning and National Roads Guidelines for Planning Authorities* and Offaly County Development Plan policy and road safety that the proposed amenity access represents, the Authority strongly recommends the omission of the proposed amenity usage of the N62 entrance in any final grant of decision.

This omission is required in the interests of road safety of all users and to avoid the potential of setting a highly undesirable precedent.

2. Mitigation of potential impacts of proposed construction delivery and haul routing on the national road network

TII observes that the proposed development proposes utilisation of elements of the national road network for turbine component delivery haul routing and construction traffic.

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 and substation 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 the local road authorities shall be in place.

EIAR "*Appendix 15-2 Traffic Management Plan*" is stated to "*set out the traffic management measures that the Applicant... will commit to provide during the construction stage*" of the proposed project. TII highlights that the proposed development components including turbines are indicated

to utilise the N6, M6, N52 and N62 all part of the national roads network. In addition, the N62 access is identified as “*Site Entrance 1*” for the purposes of the construction phase.

TII advises that elements of the national road network, including the N/M6 and likely associated routes from landing port to proposed wind farm site comprise national road and motorway network maintained, managed and operated sections under Motorway Maintenance and Renewal Contracts (MMaRC) and by Public Private Partnerships (PPP) Concessions and not local roads authorities.

TII determines that the proposed development includes use of, and alterations to, the national road network. TII notes that the submitted *Traffic Management Plan (TMP)* at section 5 describes and commits “*A detailed TMP will be finalised and confirmatory detailed provisions in respect of traffic management agreed with the Roads Authorities and An Garda Síochána prior to construction works commencing on site.*” TII observes and acknowledges the inclusion of TII and MMaRC Contractors amongst those intended to be consulted in respect of the “*delivery programme*” under “*other Traffic management matters*” for that detailed “*detailed*” TMP.

However, a record of TII and technical standards related to the national roads network and its ancillary infrastructure is absent from “*delivery of abnormal sized loads*” considerations described for the final “*detailed*” TMP. The Authority is therefore of the opinion that consultation recorded to be undertaken in respect of the final TMP appears inadequate having regard to the potential impacts of the development construction haul and delivery routes that may affect elements of the national road network managed directly by or on behalf of TII and further may invoke TII Publications (Standards and Technical) compliance requirements.

The Authority recommends that the proposed final “*detailed*” Traffic Management Plan (TMP) will be required to be revised to address these deficiencies to ensure the maintenance of the safe and efficient operation of the national road network for all road users.

2.1 Structures and Abnormal Weight Loads

TII notes that submitted EIAR “*Chapter 15 Material Assets*”, “*Table 15-1a Issues raised by TII in relation to the Proposed Project and Applicant responses*” refers to “*abnormally large loads*” whereas the submitted EIAR “*Appendix 15-2 Traffic Management Plan*” (TMP) refers to “*abnormally sized loads*” in respect of the proposed Turbine Delivery Route (TDR).

In TII’s opinion, it is unclear if the abnormal loads considered in the EIAR relate to turbine component delivery to site only or also include delivery of substation component delivery to site, which may also involve abnormal weight loads. In that regard, TII outlines the following observations for the Commission’s consideration:

- 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 any proposed haul route, all structures should be checked by the applicant/developer to confirm that all the structures can accommodate the proposed loading associated with the delivery of development components to site where the weight of the delivery vehicle and load exceeds that permissible under the Road Traffic Regulations.
- While an abnormal load is defined as anything above 46 tonnes and below 180 tonnes, any load above 180 tonnes, represents an ‘Exceptional Abnormal Load’ (‘EAL’). All structures to be crossed will need a full structural assessment by the developer in accordance with TII Publications AM-STR-06048 to verify that they can sustain any ‘EAL’

load safely and without any damage. Reference should be made to Department of Transport Circular RW18 of 2024 ('Exceptional Abnormal Loads') in that regard.

- Full details of the transportation of all Abnormal Loads and all 'Exceptional Abnormal Loads' associated with the subject development shall be agreed with all planning and road authorities along all proposed haul routes prior to the commencement of any development.

Abnormal load capacity of structures along potential haul routes were raised in the EIAR Scoping Response of TII and are recorded as "agreed" to in submitted EIAR "Table 15-1a Issues raised by TII in relation to the Proposed Project and Applicant responses". However, the submitted EIAR "Appendix 15-2 Traffic Management Plan" (TMP) does not appear to clearly define a proposed approach to management of abnormal weight loads and structures inspections in the event that such loads or EALs arise in the course of development.

2.2 TII Structure on the N62 (Eirspan name: Industrial Railway Bridge, Eirspan ID: OY-N62-008.00)

TII advises that there is a need for the current application to demonstrate that the proposal has been designed to protect of the safety, maintenance and operation of the national road network at and in the vicinity of the proposed development's location, and to meet the technical feasibility of the proposal having regard to TII Publications requirements, as appropriate.

TII notes that submitted EIAR "Chapter 4 Description of the Proposed Project", includes an element of development under section 4.7.3 *Turbine Component Transport Route* described as an "underpass extension" further described in EIAR subsection 4.11.1.4 *Underpass Extension at Site Entrance 1* and depicted on submitted Drawing titled: *Underpass Arrangement - Plan & Section* (Dwg. No. 200804-39, Rev. P01, dated 23.03.2026).

TII observes this the proposed "underpass extension" is immediately adjacent an N62 overbridge (Eirspan name: *Industrial Railway Bridge*, Eirspan ID: *OY-N62-008.00*) which is a TII Structure. TII is unable to ascertain whether the proposed "underpass extension" will necessitate the undertaking by the developer of the procedure under TII Publication *DN-STR-03001 - Technical Acceptance of Road Structures on Motorways and Other National Roads*. This Standard specifies the procedures to be followed, in order to obtain Technical Acceptance for structures on motorway and other national road schemes and for the submission of as built records. The procedures cover the design of all road structures, including bridges, tunnels, subways, culverts, buried corrugated steel structures, retaining walls, reinforced earth structures, gantries, environmental noise barriers and temporary structures under or over motorways or other roads carrying public traffic. The Technical Acceptance Requirements for the assessment, alteration, modification, strengthening and repair of all road structures must be prepared in accordance with the TII Standard: TII Publication *DN-STR-03001 - Technical Acceptance of Road Structures on Motorways and Other National Roads*.

In addition, TII reiterates the appropriateness of proposed amenity access from the N62 as part of the current proposals. Having regard to the current site boundary and "underpass extension" works as depicted on submitted Drawing No. 200804-39 and Drawings titled: *Site Layout Plan Sheet 01 of 10* (Dwg. No. 200804 - 03A, Rev. P01, dated 23.03.2026) and *Amenity Network Within and Around the Proposed Project site* (Dwg. No. 200804 - 53, Rev. P01, dated 223.03.2026) it does not appear that any works to the "underpass" TII structure (Eirspan name: *Industrial Railway Bridge*, Eirspan ID: *OY-N62-008.00*) are proposed as part of the current development. It is noted that the Offaly West Trail Network (Offaly County Council Reg. Ref. 2560014) terminates on the western side of the N62 and does not include works to the underpass (below the TII Structure).

Having regard to the foregoing, proposals which impact TII structures must be subject to co-ordination with, and the prior approval of, TII. Based on the information associated with this application and TII's own records, no procedure under TII Publication *DN-STR-03001 - Technical*

Acceptance of Road Structures on Motorways and Other National Roads has been undertaken. It is reiterated that from the information submitted, TII is unable to determine potential impact on the TII Structure and therefore necessity of the undertaking of necessary technical acceptance procedures under the relevant TII Publication DN-STR-03001.

Having regard to the potential for the proposed underpass extension to interact with the TII Structure (Eirspan name: *Industrial Railway Bridge*, Eirspan ID: *OY-N62-008.00*), detailed design and execution of the proposed “*underpass extension*” will be required to demonstrate compliance with TII Publication DN-STR-03001 - *Technical Acceptance of Road Structures on Motorways and Other National Roads*, as appropriate.

3. Necessary Mitigations

This submission identifies mitigations necessary for the maintenance of the safe and efficient operation of the national road network compatible with the proposed development and in the interests of road safety and public safety.

In the case of the above planning application, the Authority will rely on the Commission to abide by official policy in relation to development on / affecting national roads as outlined in *Chapter 3 Development Management and Roads* of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012), subject to the imposition of the following conditions in the event of making a decision to grant planning permission:

1. Prior to the commencement of development, revised details including operational phase site layout plans clearly demonstrating no access for the public to proposed amenity car parks from the N62 shall be submitted for the written agreement of the planning authority subject to the written agreement of TII. The access off the N62 shall not be utilised for public amenity access to the development site.

Reason: In the interests of road safety and the safety of the public generally.

2. Prior to the commencement of development, a detailed Traffic Management Plan (TMP) shall be submitted for the written agreement of relevant County Councils subject to the written agreement of TII. The matters to be addressed in the TMP relating to national road network maintenance and road safety shall include:
 - i. Demonstration that Compliance with TII Publications (Standards) in accordance with relevant TII Publications (Technical) will be required for any work that may impact the national road pavement, structures and infrastructure including drainage.
 - ii. Any proposed works to the national road network, including signage, to facilitate construction traffic 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.
 - iii. Any damage caused to the pavement of the existing national road due to the turning movement of abnormal ‘length’ loads (e.g. 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.
 - iv. Any works to structures forming part of the national road network requires TII Technical Acceptance in accordance with TII Publication DN-STR-03001 - *Technical Acceptance of Road Structures on Motorways and Other National Roads*. Detailed design information in respect of the proposed underpass extension immediately

adjacent an N62 overbridge (Eirspan name: Industrial Railway Bridge, Eirspan ID: OY-N62-008.00) up to and including undertaking off technical acceptance procedures as appropriate shall be required to be agreed with the Road Authority prior to the commencement of any development on site.

- v. All national road and ancillary overground/underground assets shall be subject to proper undamaged reinstatement and properly certified to the relevant standards in accordance with the assets' functions together with any working widths/depths which they require.
- vi. Separate structure approvals/permits, and other licences may be required in connection with the proposed works, including where temporary modification to the road network may be required.
- vii. In association with the above the applicant/developer shall 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. TII requests referral of all proposals agreed between the road authority, PPP Concessions and MMarC Companies and the applicant impacting on national roads.

Reason: In the interests of road safety and protection of public infrastructure.

3. Prior to the first delivery of any abnormal or exceptional abnormal load associated with the development, the applicant shall submit to, and agree in writing, with the relevant Roads Authority(s) an Abnormal Load and Exceptional Abnormal Load Management Plan. The Plan shall confirm the final haul route, pre- and post-delivery condition surveys of the public road network (including bridges and culverts where required), any necessary accommodation works, traffic management measures, and confirmation of statutory abnormal load permits and Garda escort arrangements. Prior to the first delivery of any exceptional abnormal load, the permitting process required under Department of Transport Circular RW18 of 2024 ('Exceptional Abnormal Loads') shall be completed to the satisfaction of the planning authority.

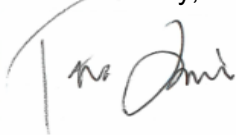
The delivery of abnormal or exceptional loads may take place outside standard construction working hours where required under the statutory abnormal load permitting process and as agreed with the relevant Roads Authority(s).

Reason: In the interests of road safety, protection of public infrastructure, and the orderly management of abnormal load movements.

The foregoing matters and their reflection as part of the proposed development is essential to avoid detrimental impact on the capacity, safety, or efficiency of the national road network, is in the interests of sustainable development, and the promotion of an integrated approach to land use and transportation planning.

Please acknowledge receipt of this submission.

Yours faithfully,



**on behalf of
Land Use Planning Unit**