Bonneagar Iompair Éireann
Transport Infrastructure Ireland

The Secretary
An Coimisiún Pleanála
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Dublin 1
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by e.mail; sids@pleanala.ie

Dáta | Date	Ár dTag | Our Ref.	Bhur dTag | Your Ref.
25 May 2026	**TII26-135842**	

Re: Strategic Infrastructure Development Application for the Proposed Carrigeen Renewable Energy Development including 11 wind turbines and associated works, County Roscommon

ACP case ref. PAX20.324167

Dear Sir / Madam,

The Authority acknowledges receipt of referral of the above proposed Strategic Infrastructure Development Application on behalf of Carraigin Power Ltd. Transport Infrastructure Ireland (TII) acknowledges that the subject development proposal can contribute to achieving the national target of renewable energy generation and reduction in greenhouse gas emissions.

In that regard, TII welcomes and is supportive of proposals aimed at achieving the transition to a low carbon and climate resilient economy, increasing renewable energy generation and enhancing energy security giving effect to National Strategic Outcome no. 8 of the National Planning Framework 'Transition to a Low Carbon and Climate Resilient Society'.

Within the foregoing context, 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 to ensure the proposed development can proceed complementary to the requirements of official policy concerning maintaining the strategic capacity and safety of the national road network in accordance with National Strategic Outcome no. 2 of the National Planning Framework 'Enhanced Regional Accessibility'.

1. Official Policy

The Commission 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).

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Table 16.2: Policy and Guidance of the EIAR submitted in support of the subject application erroneously references the DoECLG Guidance as a TII Publication, which it is not.

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.

TII notes the application description outlined in Section 2.2 of the EIAR submitted in support of the application includes proposals for junction accommodation works to facilitate turbine delivery and construction access to the Wind Farm Site, including the upgrade of existing site entrances off the N5 national road, and the construction of new site access roads off the L-1217 and L56421 local roads.

Section 2.5.4 of the EIAR confirms that the dedicated Site Access Road has been designed to bypass the existing N5/L56402 junction solely for abnormal load turbine deliveries and that following completion of Wind Turbine deliveries, the boundary treatments along the N5 and L56402 at site entrances 1 and 1a will be reinstated to prevent ongoing access.

In relation to temporary enabling works to the N5 / Access junction, TII advises;

- ***Temporary Access during construction***
  Design Report: Temporary accesses do not require a formal Design Report.
  Temporary Traffic Management: These sites must be managed as roadworks for the entire duration of their opening and remain under approved traffic management measures. Note: This falls under the remit of the Road Authority.

- ***Reinstatement***
  If the site is fully reinstated to its exact pre-works condition, no further action is required. Where the final site includes any changes to the road layout, junction layout, roadside furniture, and/or boundary conditions (e.g., replacing a fence with a wall, closing the junction with a temporary structure, etc.), a Design Report will be required of this post construction solution.

TII can confirm that no Design Report has been formally submitted for the proposed enabling works to the N5 to facilitate turbine component delivery to site and TII reiterates that the Authority is of the opinion that temporary works that will be reinstated post construction do not require a formal Design Report. Use of temporary access arrangements shall be controlled, by traffic management arrangements to ensure their sole use by the developer.

Having regard to the foregoing, TII notes no requirement for new permanent direct access or intensification of existing private access to the national road network with the potential to conflict with the foregoing provisions of official policy included in Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

2. National Road Network Maintenance and Safety

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

2.1 Proposed Turbine Component and Substation Component Delivery Route

Section 16.2.10 of the EIAR submitted in support of the subject application addresses the Turbine Delivery Route and Enabling Works. The EIAR outlines a proposed delivery route from port of entry Galway utilising N6, N83, N17, and N5, national roads to site.

Enabling works impacting the national road network are outlined in the EIAR and include N5 / Realigned N5 Tie-in west of Frenchpark; construction of an abnormal load delivery access road to allow abnormal load vehicles to access the redundant section of the N5 leading to Frenchpark from the realigned N5. Appendix 16.3 'Turbine Delivery Haul Route Assessment' also refers and Section 3.13 outlines proposals to realign N5 to Existing N5, Frenchpark.

In the first instance, 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.

In addition, a section of realignment of the N5 impacted by the subject development proposal is currently under construction between Ballaghaderreen and Scramoge. Whilst works continue along this section, separate agreement for alteration to the new sections of the N5 or any section of the existing N5 which is under traffic management must be made directly with the Contractor (Wills Bros) for those works. Wills Bros can be contacted at info@n5b2s.ie. Exact details of the locations under traffic management and all other areas in occupation by the contractor can be obtained from Roscommon County Council National Roads Office.

Where the delivery routes traverse any section of the National Road Network that is under traffic management, the developer shall be responsible for engaging with the Principal Contractor for those works.

On completion of delivery of all abnormal loads associated with the subject development any temporary enabling works shall be removed and lands and roadside boundaries reinstated to the satisfaction of the planning and roads authority.

TII requests referral of all proposals agreed between the road authorities, 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. Where temporary works within any MMaRC Contract Boundary are required to facilitate the transport of any abnormal loads to site, the applicant/developer shall contact thirdpartyworks@tii.ie in advance, as a works specific Deed of Indemnity will be needed by TII before the works can take place.

In the interests of clarification, 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 the local road authorities shall be in place.

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.

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.

In addition to the foregoing, TII outlines the following matters for the Commissions consideration in the assessment of the subject proposal concerning the proposed temporary enabling works to facilitate the delivery of turbine component and substation component delivery to site;

- The proposed temporary works to the N5 national road (new realigned and existing) in order to accommodate abnormally sized loads are for a temporary period only to facilitate turbine component and, where warranted, substation component delivery to site and thereafter temporary works shall be removed and lands reinstated following completion of the construction phase of development in the interests of road safety and adherence to the provisions of official policy.
- The proposed temporary enabling works to the N5 junction should be closed off with a temporary safety barrier when not in use for turbine component delivery, as it could be misinterpreted by drivers as part of the roadway. Pending completion of construction, the temporary works shall thereafter be permanently closed and the lands reinstated.
- Any damage caused to the pavement on the existing national road due to the turning movement of abnormal 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.
- A Road Safety Audit shall be undertaken where warranted and all recommendations of the Road Safety Audit shall be incorporated into final designs for construction and the requirements to implement the recommendations of the Road Safety Audit included as a condition on any permission granted.
- In the interests of road user safety, all works to the national road shall comply with TII Publications (formerly NRA DMRB); technical design standards for national roads.

2.2 Structures

In relation to anormal weight loads, Section 16.2.1.5 of the EIAR outlines that the main crane for Wind Turbine erection will have a maximum axle loading of 12 tonnes per axle and a maximum total weight of 100 tonnes and that vehicles delivering counterweights for the crane will have a maximum axle loading of up to 12 tonnes per axle. It is further stated that vehicle weights do not exceed 180 tonnes and structures on the haul route with spans not exceeding 50m are not subject to a Category 3 structural assessment as defined in Section 1.3 of DN-STR03001 published by TII for exceptional abnormal loads.

It is noted that the clarifications included in the EIAR relate to abnormal weight loads concerning the delivery of turbine components. It is unclear if any substation components may also relate to abnormal or exceptional abnormal loads. In that regard, TII outlines the following observations for the Commissions 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. In that regard, TII recommends consideration to the inclusion of the following condition to address the potential for any abnormal or exceptional abnormal loads associated with Turbine and Substation Component delivery to site.

Proposed Condition;

> *'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'.***

2.3 Grid Connection Routing

Section 12.4.1.1 'Accelerate Renewable Electricity Generation' of the Climate Action Plan 2024 (CAP24) outlines the objective of reaching 80% of electricity demand from renewable sources by 2030 through a range of measures, including; *'All relevant public bodies will carry out their functions in a manner which supports the achievement of the renewable electricity targets, including, but not limited to, the use of road and rail infrastructure to provide a route for grid infrastructure where this is the optimal solution'*.

Consistent with CAP24, for all renewable energy developments requiring grid connection to the national grid, TII recommends that a full assessment of all route alternatives for grid connection takes place, including alternatives to public road, where appropriate.

In considering the subject proposal, TII refers the Commission to Department of Transport Circular RW 07 of 2025 and the 'Interim Guidance to Road Authorities (placement of Medium or High Voltage electricity assets)' and the associated update issued with Circular RW 05 of 2026, both of which can be accessed at; https://www.gov.ie/en/publication/ece06-electricity-transmission-infrastructure-development-roads-sector-engagement-framework-interim-guidance.

The 'Interim Guidance', as outlined in the Circulars, are issued pro tem until the development of any procedures for the planning, regulation, construction and management of Medium or High Voltage cables under public roads.

Section 2.2 of the EIAR submitted includes the project details outlining the provision of a 110kV substation compound with all associated electrical plant and apparatus, etc. and underground electrical (110kV) and communications cabling from the proposed 110kV Onsite Substation to the existing Flagford 220kV substation.

It is confirmed within the EIAR that the on-site Substation and Grid Connection will be under the ownership of ESB Networks and will form a permanent part of the national grid infrastructure, which will not be decommissioned with the wind farm at the end of its operational life. Therefore, TII considers that regard should also be had to the 'Electricity Transmission Infrastructure Development – Roads Sector Engagement Framework' included in DoT Circular RW 07 of 2025.

The 'Interim Guidance to Road Authorities (placement of Medium or High Voltage electricity assets)' outlines the requirement for applicants to engage with the road authority to determine the 'optimal solution' for grid connection routing, an approach that is consistent with CAP 24 provisions.

It is unclear that DoT Circulars RW 07 of 2025 and RW 05 of 2026 have been considered in the preparation of the subject application grid connection proposal.

In relation to the specific application, proposals for a c. 17.5km grid connection cable routing between the proposed on-site Substation and the Flagford 220kV substation, the national road interactions include a crossing of the N61 outlined as being by 110kV cable trench in the public road.

In accordance with the National Planning Framework National Strategic Outcome no. 2 'Enhanced Regional Accessibility', there is a requirement to maintain the strategic capacity and safety of the national road network. This requirement is further reflected in the National Development Plan, the National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

TII has identified a number of significant implications for TII and road authorities in the management and maintenance of the strategic national road network resulting from the laying of high voltage electricity cabling in the national road reservation, including;

- Impacts on embankments, bridges, drainage and road furniture infrastructure leading to future maintenance liabilities,
- Impediments to future maintenance and operations activities, such as safety barrier repair and French drain renewal,
- Impediments to future routine network improvements such as pavement overlay and strengthening, installation of new verge-side signs and other road furniture,
- Impacts on network traffic flows during installation,
- Impediment to future on-line upgrades of national roads because of the implications to road authority / TII in having to incur the additional costs of moving underground cables in order to accommodate the road improvements.

Proposals to lay cable in the national road reservation have the potential to impact road authorities and TII in undertaking future maintenance and improvement requirements. There may also be additional cost implications to national road improvements and maintenance resulting from the presence of high voltage cabling within the national road reservation.

Having regard to the measures identified in CAP24 and the information in relation to grid routing included in the subject application, TII recommends that the Commission be satisfied that the proposed grid routing represents the optimal routing solution.

In relation to standard construction details and specifications, TII notes that Section 2.5.9 of the EIAR submitted proposes that the proposed Grid Connection will be constructed to the requirements and specifications (CDS-GFS-00-001-R13) of EirGrid.

TII considers that clarification in relation to the approach outlined in the EIAR is required in the context of the Department of Transport Circulars RW 07 of 2025 and RW 05 of 2026, and the 'Interim Guidance', which, as outlined in the Circulars, are issued pro tem until the development of any procedures for the planning, regulation, construction and management of Medium or High Voltage cables under public roads.

To address the approach proposed in the subject application, TII recommends that the Commission has regard to the requirements of Department of Transport Circulars RW 07 of 2025 and RW 05 of 2026. The Authority respectfully proposes the following condition for the Commissions consideration in relation to grid connection routing proposals;

Proposed Condition;

'Crossings of the N61 national road network shall be by HDD only. All standards for grid connection cable construction and associated infrastructure in the public road shall be agreed with the Road Authority prior to the commencement of any development.

'Reason; In the interests of clarity as to the construction of this permission, to ensure adherence to Department of Transport Circulars RW 07 of 2025 and RW 05 of 2026, to safeguard the strategic function and maintain levels of safety on the national road network in accordance with National Strategic Outcome no. 2 of the National Planning Framework, RPO 6.5 of the Northern and Western Regional Assembly Regional Spatial and Economic Strategy and Development Plan Policy Objectives ITC 7.12 and ITC 7.14 of the Roscommon County Development Plan, 2022 – 2028'.

TII requests that the Commission assesses the proposed grid routing to determine that the 'optimal solution' results, having regard to the foregoing considerations.

Where an 'optimal solution' for grid routing impacts the national road network, TII requests that any permission granted includes the above proposed condition and that the following principles apply;

- Any cable routing should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, embankments, drainage, structures, etc. and works required to such infrastructure shall only be undertaken in consultation with and subject to the agreement of TII, any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network.
- The Commission will also note that Section 5.5 of TII Publications DN-STR-03012 (Design for Durability) requires that electricity cables 10kV or greater shall not be located on or over road structures, including buried structures. Where electricity cables 10kV or greater are required to cross a road structure they shall pass below the structure, at a sufficient depth so as to remove the potential for any impacts on the structure during operation.

2.4 Greenways

In relation to any Greenway or Active Travel proposals in the vicinity of the proposed works, consultation with Roscommon 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.

In the interests of clarification, no part of this submission shall be construed as TII giving consent to access or alter any national road infrastructure assets including drainage regimes, vehicle restraint and safety systems, ducting, HDD crossings, structures, etc.

In the event that any damage is caused by any development works to the national road or associated assets, overground or underground, costs arising to fully remediate all impacted infrastructure assets to TII Publications standards and requirements will be pursued by or on behalf of TII.

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

Yours faithfully,

Michael McCormack
Senior Land Use Planner