

From: [Landuse Planning](#)
To: [SIDS](#)
Cc: [Landuse Planning](#)
Subject: ACP case ref. PAX16.324387 (RWE Renewables Ireland Limited)
Date: Thursday 6 August 2026 16:58:25
Attachments: [image001.png](#)
[ACP case ref. PAX16.324387.pdf](#)

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TII ref. TII26-134780

Dear Sir / Madam,

Please find attached a copy of TII Observations on the above Strategic Infrastructure Development Application.

Yours sincerely,

Ruairí Dunne

Graduate Land Use Planner



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

by e.mail; sids@pleanala.ie

Dáta | Date

6 August 2026

Ár dTag | Our Ref.

TII26-134780

Bhur dTag | Your Ref.

ACP-324387-26

Re: Proposed development of 13 no. wind turbines, with associated 110 kV substation, BESS, and all associated works, at Muingmore and surrounding townlands, Co. Mayo

Applicant: RWE Renewables Ireland Limited

Dear Secretary,

Transport Infrastructure Ireland (TII) acknowledges receipt of referral of the above proposed windfarm, grid connection and turbine delivery route application on behalf of RWE Renewables Ireland Limited

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).

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 the application documentation submitted indicates no direct access requirements to the national road network in the first instance.

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 2.84, Section 14.120 and Appendix 14-1 (Abnormal Indivisible Load Route Survey) detail the Turbine Delivery Route to site and Enabling Works. Port of entry is identified as Killybegs Port, Co. Donegal, and the turbine component haul route utilises the N56, N15, N4 and N59 national roads before reaching the proposed development site. Minor and temporary works are proposed to facilitate turbine component delivery to site.

Technical Appendix 14-1 'Abnormal Indivisible Load Route Survey' identifies the requirement for a temporary over-run area to the north of the N59 / R312 junction in order to accommodate the abnormally sized loads effectively. It is noted that the works outlined in the EIAR are temporary works to facilitate turbine component delivery to site. TII outlines the following for the Commissions consideration:

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.

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.

The proposed temporary works to the N59 / R312 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.

Upon completion of development, the national road and all temporary works shall be reinstated to the satisfaction the roads authority.

2.2 Structures

TII notes the details presented in Table 2-1 within Technical Appendix 14-1. In the interests of clarity and 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' 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 TII's experience, grid connection accommodated on national roads has the potential, inter alia, to result in technical road safety issues such as differential settlement due to backfilling trenches and can impact on ability and cost of general maintenance, upgrades and safety works to existing national roads. TII respectfully requests that the Commission assess the proposed grid routing to determine that the 'optimal solution' results.

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' which, as outlined in the Circular, 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 by the 'HV Forum' and the conclusion of any outcomes from the Private Wires Consultation undertaken by the Department of Energy, Climate and Communications.

Although Section 2.26 of the EIAR indicates that the 110kV grid connection between the onsite substation and the existing substation at Bellacorick is not included in the planning application for the Proposed Development, a grid connection routing is outlined in the EIAR.

The Grid Connection routing includes cabling with a total length of approximately 25.5 km, with the majority of the route located within the N59 carriageway. The works outlined have the potential to significantly impact the levels of safety and strategic function of the national road network in this area. In that regard, it is noted that table 14-1 in Section 14.15 of the EIAR outlines the comments of Mayo County Council as follows; *"Concerns regarding the proposed grid connection route and its potential effect on the structural integrity and strategic importance of the N59 and adjacent local roads. No alternative routes have been identified"*.

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.

It is also apparent that there are alternative routing options to the applicant/developer in the region that avoid such significant impacts to the strategic national road network in the area, for example, it is noted that the nearby Oweninny Windfarm Phase 3 SID Application (ABP-

316178-23) was granted with a HV grid connection to Bellacorick Substation but routes the grid connection within private lands in a manner that avoids direct impacts to the strategic national road network.

TII recommends that in the subsequent application for grid connection, the applicants and the Commission assess the proposed grid routing to determine that the 'optimal solution' results taking account of the above considerations and having regard to the provisions of official policy 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'.

The Commission will be aware of a number of renewable energy development proposals grid connections to the Bellacorick 110kV substation with routing identified along the same sections of the N59, national road. Clarification may be necessary to demonstrate that proposals can all be accommodated in the finite road space, where proposed grid connection routes interact. Opportunities to co-ordinate proposals in that regard, to ensure deliverability and to mitigate impact to the road network, may be available.

Where an 'optimal solution' for grid routing impacts the national road network, 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.

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,

A handwritten signature in dark ink, appearing to read "T. J. Smith", is positioned above a horizontal line.

**on behalf of
Land Use Planning Unit**