

OBSERVATION

Crumhach Wind Farm, Co. Sligo — An Coimisiún Pleanála Case 324561

Blair Feeney Limited, Main Street, Dromore West, Co. Sligo

Submitted to An Coimisiún Pleanála

Observer	Blair Feeney Limited
Address	Main Street, Dromore West, Co. Sligo
Premises	Two trading premises at Dromore West, both operated by the observer: (i) service station, forecourt shop and fuel forecourt , Main Street, Knockaculleen , Dromore West, F26 P2Y0 — approximately 70 m from Location 15 on the applicant's turbine delivery route, at the junction of the N59 and the R297; and (ii) supermarket , Main Street, Dromore West, F26 E400 — approximately 75 m from the same junction. Staff car park located on the R297.
Applicant	SSE Renewables (Ireland) Ltd
Case	An Coimisiún Pleanála Case 324561
Primary issues	(1) Access to and management of our staff car park on the R297; (2) disruption to deliveries to our premises, including fuel tanker deliveries of a dangerous substance and ambient and fresh grocery deliveries; (3) closure of the shared customer car park crossed by the applicant's own swept path; (4) disruption to utilities including electricity, water and telecommunications

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To: An Coimisiún Pleanála

Re: Case 324561 — Proposed Crumhach Wind Farm, Co. Sligo

Applicant: SSE Renewables (Ireland) Ltd

Observer: Blair Feeney Limited, Main Street, Dromore West, Co. Sligo

Dear Sir/Madam,

We wish to make an observation in relation to the above planning application. We own and operate two trading premises at Dromore West, both fronting the N59 close to its junction with the R297, and both within 75 metres of Location 15 on the applicant's turbine delivery route:

- a **service station, forecourt shop and fuel forecourt** at Main Street, **Knockaculleen**, Dromore West, F26 P2Y0, approximately **70 metres** from that junction; and
- a **supermarket** at Main Street, Dromore West, F26 E400, approximately **75 metres** from it.

Our staff car park is located on the R297. Between the two premises we employ approximately 30 people, full-time and part-time, drawn from the surrounding area.

We draw the Commission's attention at the outset to the townland. The statutory site notice seeks accommodation works "*along the R297 in the townland of Knockaculleen*". Our service station and fuel forecourt stands in that townland. We are not a party located near the works the applicant has advertised; we are a party located in the place it has named.

Our concerns are not a general objection to wind energy. They arise from the specific arrangements proposed for turbine delivery past and through this junction, from the absence of any assessment of the effect of those arrangements on a trading premises and on the people who work in it, and from the adequacy of the submitted information on utility services and reinstatement.

Throughout this observation, where we say that we have not identified something in the submitted documents, we mean exactly that. We do not assert that no such material exists. We ask that the applicant either identify it or be required to provide it.

Every factual statement in this observation is referenced. Sources are cited in the text in the Harvard style, and a full reference list, together with a key identifying each of the applicant's documents by its citation code, is at **Appendix B**. Page numbers for the applicant's Environmental Impact Assessment Report are given in the applicant's own format, in which p. 15-63 means page 63 of Chapter 15.

1. Executive summary of concerns

Our four principal concerns are set out first, in order of importance to this business.

1 — Our staff car park is on the R297, and the applicant's own drawing plots the turbine envelope across its only entrance. Drawing WCH-CVL-SK-0011-02, Sheet 002 of 007 (Location 15, "SPA Dromore West") plots the body, wheel and load envelopes of a manually steered vehicle across the sole access to the yard where approximately 30 staff park, the first arriving from 6 a.m. We have identified no assessment of pedestrian or vulnerable road user movement here, and Chapter 15 does not deal with car parking. The location has been drawn but has not been assessed.

2 — Deliveries to our premises will be interrupted, and one of them is a dangerous substance. As a supermarket and fuel forecourt we take fuel tanker deliveries (a dangerous

substance carried under ADR, the European agreement governing the carriage of dangerous substances by road, and subject to fixed distribution slots and driver tachograph hours) and grocery deliveries, ambient and fresh, on which the shop's trading depends. The applicant proposes Garda-escorted convoys that *"stop traffic when required"* on 45 separate occasions, without stating a clock time for any. The Traffic Management Plan makes no reference to fuel stations, filling stations, forecourts, hazardous goods vehicles, deliveries to premises or emergency vehicle access.

3 — The shared customer car park will have to be closed for each turbine load to pass. The parking area on our N59 frontage serves our premises and the adjoining premises, and the applicant's plotted envelopes cross it. No document states how long it must be closed, how often, at what times, who clears it, what becomes of a vehicle left in it, or what alternative parking is proposed. We have identified no alternative parking provision in the application.

4 — Utilities. The EIAR contemplates that turbine delivery will require *"temporary relocation of powerlines/poles, lampposts, signage"* (MKO, 2026e, section 15.1.9, p. 15-63), but identifies no location, pole, premises or duration. The chapter assessing utilities, section 15.3.3.1, is scoped throughout to services *"within or adjacent to the Proposed Wind Farm or Proposed Grid Connection Route"*. The turbine delivery route is neither of those. The EIAR therefore proposes to move powerlines along a route whose utilities it has not surveyed. Our forecourt cannot trade without electricity, on which the pumps, tills and tank gauging all depend.

The following further matters are set out below.

- **The applicant says turbine deliveries will be made at night, but does not say when night begins or ends.** Chapter 15 states that this stage will take *"45 days/ nights... with all deliveries made during the night"* (MKO, 2026e, p. 15-24), yet neither Chapter 15 nor the Traffic Management Plan states a clock time, delivery window or definition of "night" for convoy movements. The Construction Noise Report defines night-time as 23:00 to 07:00 (MKO, 2026o, p. 10). We ask the Commission to require the applicant to state the hours within which convoys will move, and to fix them by condition.
- **The EIAR twice states that accommodation works are required on the regional road network, then assesses twenty locations, none on a regional road.** Chapter 4, section 4.5.3.1 (MKO, 2026a, p. 4-62) and Chapter 10, section 10.3.2.2 (MKO, 2026c, p. 10-24) both require works on the *"national and regional road network"*. Chapter 15, section 15.1.10 (MKO, 2026e, p. 15-63) describes the assessment carried out as covering the *"National and Local Road networks"*, and the twenty numbered Locations contain no regional road. The R297, on which the statutory notice seeks accommodation works at Knockaculleen, has not been assessed; the only occurrence of "R297" we find in Chapter 15 is a place-name label on a map.
- **Reinstatement of the delivery route is held to a lower standard than the grid connection.** For the grid connection the applicant accepts a Road Opening Licence, reinstatement to the Council's specification, reinstatement fees *"held for a minimum of two years"*, and compliance with the *Guidelines for Managing Openings in Public Roads, 2017*. For the works affecting us, the commitment is that locations *"will be reinstated to the pre-delivery condition"*, with no licence, specification, retention or bond, and with a condition survey offered only *"Where required by the local authority"*. At Location 15 the works are described as the removal of street furniture and the preparation of footpaths for axle loads (MKO, 2026a, p. 4-64). We ask the Commission to require the applicant to state the condition to which the footpath, kerbs and signage at this location will be reinstated, to what specification, and by when.

2. The staff car park on the R297, and how it is to be managed

We raise this ground first because it concerns the safety of our staff and customers as well as the running of the business.

2.1 The facts

Our staff car park is on the R297. Approximately 30 staff, full-time and part-time, arrive and depart across the trading day, the first from 6 a.m., and move on foot between the car park and the premises.

2.2 What the applicant seeks on this road

The site notice, Chapter 4 and the Non-Technical Summary each seek permission for (SSE Renewables, 2026; MKO, 2026a; MKO, 2026m):

“Accommodation works along the N59 in the townlands of Corhawnagh and Abbeytown, along the R297 in the townland of Knockaculleen, along the L2702 in the townland of Lecarrow and Dromore, along the L2702 in the townland of Rathgoonaun and along the L2702 and L6309 in the townland of Crowagh or Dunneill Mountain, to facilitate the delivery of turbine components and other abnormal sized loads to site.”

Physical works are therefore sought on the R297 for turbine delivery.

2.3 What we have not been able to identify

The R297 is not mentioned in the Traffic Management Plan, whether in the route description, in a table or in a mitigation measure.

It is not mentioned in the text of Chapter 15, Material Assets. The only occurrence of “R297” we find there is a place-name label on Figure 15-27, the Built Services figure for the grid connection route, alongside “R294”, “N59” and “DROMORE” as background cartography. A road number appearing on a map does not amount to an assessment of that road.

In Chapter 4, “R297” appears in the statutory description and as a label on two figures (Figure 4-29, “Quarries within 25km”, and Figure 4-31, the delivery route map). It appears in no narrative paragraph of either chapter.

In addition, the schedule of locations the applicant did assess omits the R297. Chapter 4, section 4.5.3.1 (MKO, 2026a, pp. 4-62 to 4-65) and Chapter 15, section 15.1.10 (MKO, 2026e, pp. 15-63 to 15-67) each list twenty numbered Locations:

Locations	Road
1–8	N15
9–10	N4 / N4–N59 junction
11–15	N59
16–17	Dromore West
18–19	L2702
20	L2702 / L6309 junction

None of the twenty is on a regional road, as the applicant’s own list shows.

Chapter 4 (MKO, 2026a, p. 4-62) nevertheless states:

“Accommodation works will be required at various locations on the national **and regional** road network between the port of arrival in Killybegs and the Proposed Wind Farm site.”

Chapter 10, Air Quality, section 10.3.2.2 (MKO, 2026c, p. 10-24) says the same:

“In order to accommodate the delivery of turbine components, accommodation areas will be required at various locations on the national **and regional** road network between the port of arrival in Killybegs and the Proposed Wind Farm.”

Chapter 15, describing the assessment actually performed, section 15.1.10 (MKO, 2026e, p. 15-63), says this:

“An autotrack assessment from Killybegs Port, via the National **and Local** Road networks, to the Proposed Wind Farm is provided as Appendix 15-3.”

Two chapters and the statutory notice therefore assert regional road works, while the assessment extended only to national and local roads and the schedule of twenty locations contains no regional road.

We do not suggest concealment. Our point is that the EIAR asserts a category of works, regional road accommodation works, which it has not assessed at any location.

That omission affects us directly. The townland the applicant has named in its own statutory notice, Knockaculleen, is the townland in which our service station and fuel forecourt stands. Our staff car park is on the R297. The applicant has advertised works on a road at a place, sought consent for them, and then produced an assessment which does not mention either that road or that place.

We have identified no baseline traffic count for the R297. Chapter 15, Table 15-2 sets out nine assessment links: the N56, the N15 at two locations, the N4, the N59 at two locations, the L2702 at two locations and the L6309. No regional road is among them.

We have identified no predicted vehicle movement figure, PCU figure, percentage increase, or severance or delay assessment for the R297.

We have identified no road safety audit of this road or junction. The Stage 1 Road Safety Audit of 21 April 2026 (MKO, 2026h) examined five site accesses on the L6309 and L2702, and records that *“verification or compliance with design standards has not formed part of the audit process.”*

We have identified no assessment of pedestrian or vulnerable road user movement near this junction. Chapter 15, section 15.1.14, headed “Provision for Sustainable Modes of Travel”, has subsections on walking and cycling and on public transport, but nothing on movement between a car park and a premises on a road where abnormal loads will turn. The chapter does not address car parking.

2.4 The proximity of the manoeuvre to the forecourt and the car park

The Autotrack drawing models a manually steered vehicle and load combination of approximately 77.8 metres carrying a 74 metre blade. Our two premises sit on opposite sides of Location 15 at the junction of the N59 and the R297: the service station and fuel forecourt approximately 70 metres to the east of the junction, and the supermarket approximately 75 metres to the west. The manoeuvre therefore takes place between them. Our staff car park access lies on the R297 itself.

The vehicle is longer than the distance it has to travel to reach us. A single combination of 77.8 metres cannot fit within the ground between the junction and our forecourt, because there is only 70 metres of it. When the front of that vehicle reaches our forecourt access, the rear of the load has not yet left the junction, and neither has the rear Garda escort or the traffic control operating behind it. The same is true of the supermarket on the far side of the junction.

A convoy is three to five such vehicles. Three of them, nose to tail and disregarding the gaps between them, extend to some 233 metres, which is more than three times the distance from the junction to our forecourt and more than the length of our entire frontage. For the duration of each passage the whole of that frontage, and both accesses, lie within the movement.

The submitted documents do not assess the length of carriageway a convoy occupies, how long the junction and its approaches are occupied, or the consequences for access to the premises on either side.

2.5 The applicant's own drawing shows the swept path at our staff car park and across the shared customer car park

Appendix 15-3, drawing WCH-CVL-SK-0011-02, Sheet 002 of 007, "Turbine Delivery Route – Location 15", titled "SPA Dromore West", is a swept path analysis of this location at 1:500. It models a vehicle and load combination of 77.8 metres carrying a 74 metre blade, and its notes record that *"THE VEHICLE USES MANUAL STEERING."* It plots three envelopes: body outline, wheel envelope and load outline.

Figure 2 reproduces it with the two features relevant to staff access marked.

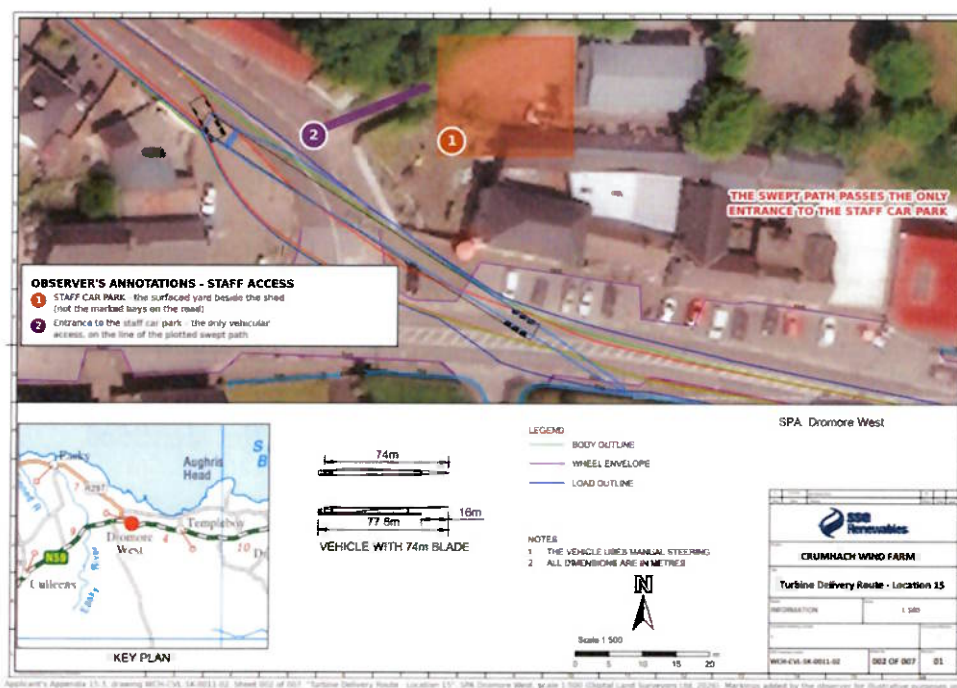


Figure 2 — Staff car park and its entrance, marked by the observer on the applicant's swept path drawing for Location 15 (Digital Land Surveyors Ltd, 2026, Sheet 002 of 007).

1 — Our staff car park: the surfaced yard immediately beside the shed, in the upper part of the drawing. (The marked bays visible on the roadside are a different area.) Approximately thirty staff park there, the first arriving from 6 a.m.

2 — The entrance to the staff car park, taken directly off the public road. It is the only vehicular access to the car park, and lies on the line of the plotted swept path.

The shared customer car park crossed by the envelope is dealt with at section 4 below, as it concerns trade rather than staff safety.

The applicant has therefore plotted the swept envelope of a 77.8 metre manually steered vehicle across a shared public-facing car park and the only entrance to a car park used daily by thirty

employees, without recording in the written assessment that either facility exists, that it is in commercial use, or that any measure is needed to manage the interaction.

The applicant has plotted the manoeuvre past these facilities but has not assessed its effect on them. That assessment should be before the Commission.

2.6 The 6 a.m. hour belongs to neither regime

The applicant proposes convoys “*at night*” without defining night, and sets construction core hours from 07:00. Staff arriving from 6 a.m. therefore arrive between the two regimes, at a time when convoys may still be moving and before construction traffic management need be in place. We have identified no document that addresses that hour.

2.7 The comparison with the other regional roads

Three regional roads appear in this application. They are treated differently.

	R290	R284	R297
Purpose	Grid connection	Grid connection	Turbine delivery — accommodation works sought
Named in a route description	Yes	Yes	No
Traffic management designation	“Stop & Go”	“Closure”	None identified
Length stated	6.9 km	2.8 km	None identified
Duration stated	69 days	28 days	None identified
Diversion route identified	Yes	Yes — R290, L5204, 8.9 km additional trip	None identified
Appears in the Traffic Management Plan	Yes	Yes	Not identified
Appears in Chapter 15	Yes	Yes	Not identified
Baseline traffic count	None identified	None identified	None identified
Road safety audit	None identified	None identified	None identified

Sources: MKO (2026k), Section 5, Tables 15-29 and 15-30, pp. 12–13; Chapter 15, section 15.1.2.4 (MKO, 2026e, p. 15-16).

Two points follow. First, the applicant has planned traffic management for regional roads elsewhere in this application. It did so twice for the grid connection, identifying method, duration and where displaced traffic would go, including the 8.9 km added to a driver’s journey by the R284 diversion.

Second, the R297 is the only regional road on the turbine delivery route. The route as written runs N56, N15, N4, N59, L2702, L6309, which are national and local roads only. The R297 is therefore the only regional road on that route and the only road on which accommodation works are sought without identifiable traffic management provision. It is also the point at which the project’s largest vehicles turn beside a staff car park used by thirty people.

Chapter 15 (MKO, 2026e, p. 15-3), in the applicant’s response to a scoping submission, states that the swept path analysis “*sets out the temporary local measures that will be required on the national, regional and local road networks.*” That is the fourth place in which regional road works are

asserted, the others being Chapter 4 at p. 4-62, Chapter 10 at p. 10-24 and the statutory site notice. We have not been able to identify where those measures are set out.

2.7A Only one junction was capacity tested, and it was not this one

Chapter 15, section 15.1.6 (MKO, 2026e, p. 15-48) records a detailed junction capacity test at one location only:

“the only junction on the National and regional road network that approaches this threshold on a temporary basis is the **N59 / L2702 junction**, where the traffic flows on the N59 arm are forecast to increase by a maximum of 9.5%.”

That junction was modelled in PICADY. The N59 / R297 junction was not modelled, and we have identified no capacity test, PICADY run or forecast flow for it.

The applicant's own documents do not support the statement that the N59/L2702 junction is the only junction on the national and regional network approaching the 10% threshold. The applicant holds no baseline traffic count for the R297, which is not among the nine assessment links in Table 15-2, and a percentage increase cannot be calculated against a baseline that has not been measured.

3. How the turbine deliveries are proposed to take place

3.1 What the applicant says

The Traffic Management Plan at section 2.1 and Chapter 15 at section 15.1.2.2 describe the delivery route in identical terms:

“exits Killybegs Port and travel east on the N56 towards Donegal, further south along the N15 towards Sligo before continuing south on N4 through Ballysadare, and subsequently merging onto the N59 heading west towards Dromore West. Delivery vehicles will then head south on the L2702 before turning east towards the site entrance.”

On the vehicles and convoys, Traffic Management Plan section 2.2, page 5:

“Turbine components are usually transported in convoys of 3 vehicles at night when traffic is lightest.”

“It is estimated that 120 abnormal sized loads will be delivered to the site, comprising 45 convoys of 3 vehicles, undertaken over 45 separate nights.”

“In order to manage each of the travelling convoys, for each there will be two Garda escort vehicles that will stop traffic when required at the front and rear of the convoy of 3 vehicles.”

The same sentence appears at Chapter 15, section 15.1.15.5.2 (MKO, 2026e, p. 15-96):

“It is estimated that 120 abnormal sized loads will be delivered to the site, comprising 45 convoys of 3 vehicles, undertaken over 45 separate nights.”

Forty-five convoys of three vehicles is one hundred and thirty-five loads, which does not agree with the figure of one hundred and twenty. Chapter 15 at section 15.1.4.2 (MKO, 2026e, pp. 15-23 to 15-24) gives a third figure:

“a total of 136 abnormally sized loads to be delivered to the site and a further 68 loads to be delivered by standard HGVs”

“it is assumed that the turbine delivery element will progress at the rate of 3 extended artic trips made by convoy to the Proposed Project site on 5 days per week”

“This will result in this stage taking 45 days/ nights (with one convoy comprising 4 loads) spread over a 9-week period with all deliveries made during the night.”

Three figures are therefore given for one quantity (120, 135 and 136), two of them in the same chapter. They should be reconciled, because the number of loads determines how often this junction and the car park in front of our premises are given over to the manoeuvre.

3.2 The hours of delivery are not stated

The applicant’s position is that turbine components will be delivered at night. Chapter 15 states that this stage will take *“45 days/ nights... with all deliveries made during the night”* (MKO, 2026e, p. 15-24), and Chapter 4 that convoys will be *“completed at night when roads are quietest”* (MKO, 2026a, p. 4-66). We take the applicant at its word.

Neither Chapter 15 nor the Traffic Management Plan says what “night” means for this purpose. We have identified no clock time, start or finish time, delivery window or curfew for abnormal load movements in either document.

The application does define night-time elsewhere. Appendix 12-1, the Construction Noise Report, adopts at Table 3-2 (MKO, 2026o, p. 10):

Period	Hours
Day-time	07:00 – 19:00 weekdays; 07:00 – 13:00 Saturdays
Evening / weekend	19:00 – 23:00 weekdays; 13:00 – 23:00 Saturdays; 07:00 – 23:00 Sundays
Night-time	23:00 – 07:00

The Traffic Management Plan, which will govern the convoys, adopts neither that definition nor any other. Chapter 4 separately provides that turbine delivery may take place outside normal working hours of *“0700 – 1900hrs Monday to Saturday”*, and that such out-of-hours working *“will be notified in advance to the Local Authority”* (MKO, 2026a, p. 4-82). No notification to affected premises is provided for.

We do not assert that the applicant intends to deliver during our trading hours. We ask the Commission to require it to say, in clock time, when the convoys will and will not move, so that the commitment to night-time delivery can be relied upon and enforced.

3.2A The Saturday hours are stated two different ways

Saturday is our busiest retail day. The documents diverge on its hours.

Chapter 4 (MKO, 2026a, p. 4-82): normal daytime working hours are *“0700 – 1900hrs Monday to Saturday”*.

Chapter 4, for the grid connection works (MKO, 2026a, p. 4-103): *“Monday to Friday 07:00 to 19:00 and Saturday 07:00 to 19:00”*.

Appendix 12-1, section 1.2 (MKO, 2026o, p. 2): *“construction activities are likely to be limited to core hours between 07:00 and 19:00 on weekdays and 07:00 – 13:00 on Saturdays.”*

The Saturday working day therefore ends at either 13:00 or 19:00, a six-hour difference on our busiest trading day. The noise assessment proceeds on the shorter assumption, while the project description permits the longer.

3.3 Why this matters to these premises in particular

The two premises are supplied by three distinct delivery streams, each exposed to the proposed convoy movements, and each reached from the same junction. The consequences of interruption differ in each case.

Fuel tanker deliveries — a dangerous substance, on a fixed slot

The forecourt takes fuel tanker deliveries outside trading peaks, as is standard for a filling station. This avoids discharging while the forecourt is busy and suits the tanker fleet's operating pattern.

A road fuel tanker carries a dangerous substance and is regulated accordingly. The load travels under the ADR regime governing the carriage of dangerous substances by road, the vehicle is placarded, the driver holds an ADR vocational licence, and discharge is a controlled operation that cannot be abandoned part-way and resumed. Such a vehicle should not be held stationary in a convoy queue or at a stop-and-go control point on a national road through a village, for an unstated period, on 45 occasions. The possibility that it may be has not been identified, assessed or mitigated in the submitted documents.

The tanker's slot is fixed by a distribution schedule and the driver is bound by tachograph hours. A tanker delayed at an escorted convoy point may run out of driving time, and one unable to enter the forecourt must abort and return to the terminal. If the delivery does not take place, the forecourt runs dry until the next, losing both the fuel margin and the shop trade the fuel visit generates.

Fresh grocery deliveries — time-critical and temperature-controlled

Fresh, chilled and frozen deliveries arrive early and must arrive on time. They are temperature-controlled loads with a limited safe window, worked out for the trading day. A chilled vehicle held at a traffic control point puts the load at risk, and the shelves stay empty through the morning. Staff arriving from 6 a.m. are there to work those deliveries, so the arrival hour at section 2.6 above and the delivery window here are two aspects of the same problem.

Ambient grocery deliveries — volume, and a fixed drop sequence

Ambient deliveries are large vehicles on a multi-drop run. A missed drop is not re-run the same day but moves to the next scheduled run. An obstructed access therefore costs days of stock availability rather than minutes.

The treatment of deliveries in the submitted documents

Each stream must cross the same junction, on 45 occasions, during a period the applicant has not defined, while Garda escorts *"stop traffic when required"*.

The Traffic Management Plan does not address access to premises. It contains no reference to a filling station, a forecourt, a hazardous goods or ADR load, a delivery to a premises, loading or unloading, or emergency vehicle access. It contains no measure to maintain access during convoy movements, no requirement that delivery and convoy windows be kept apart, and no protocol for a tanker or refrigerated vehicle held at a traffic control point.

We do not say these matters cannot be managed. We say they have not been assessed, and that the document intended to manage them does not address them. Effects on an existing commercial operation must be identified before consent under the EIA Directive, and a stop-and-go system at the

access to a fuel forecourt is a matter that should be settled at this stage rather than left to a contractor.

There is also a public safety aspect. A rural filling station is where local emergency and utility vehicles refuel. We have identified no assessment of the resupply of that facility, or of the passage of emergency vehicles through an escorted convoy point.

4. The shared customer car park

The applicant's own drawing shows a further consequence of the proposal which has not been assessed.

The parking area on the N59 frontage is a shared customer car park serving our premises and the adjoining premises. The applicant's swept path drawing plots the body, wheel and load envelopes of a 77.8 metre manually steered vehicle across it, as marked at Figure 3 (Digital Land Surveyors Ltd, 2026, Sheet 002 of 007).

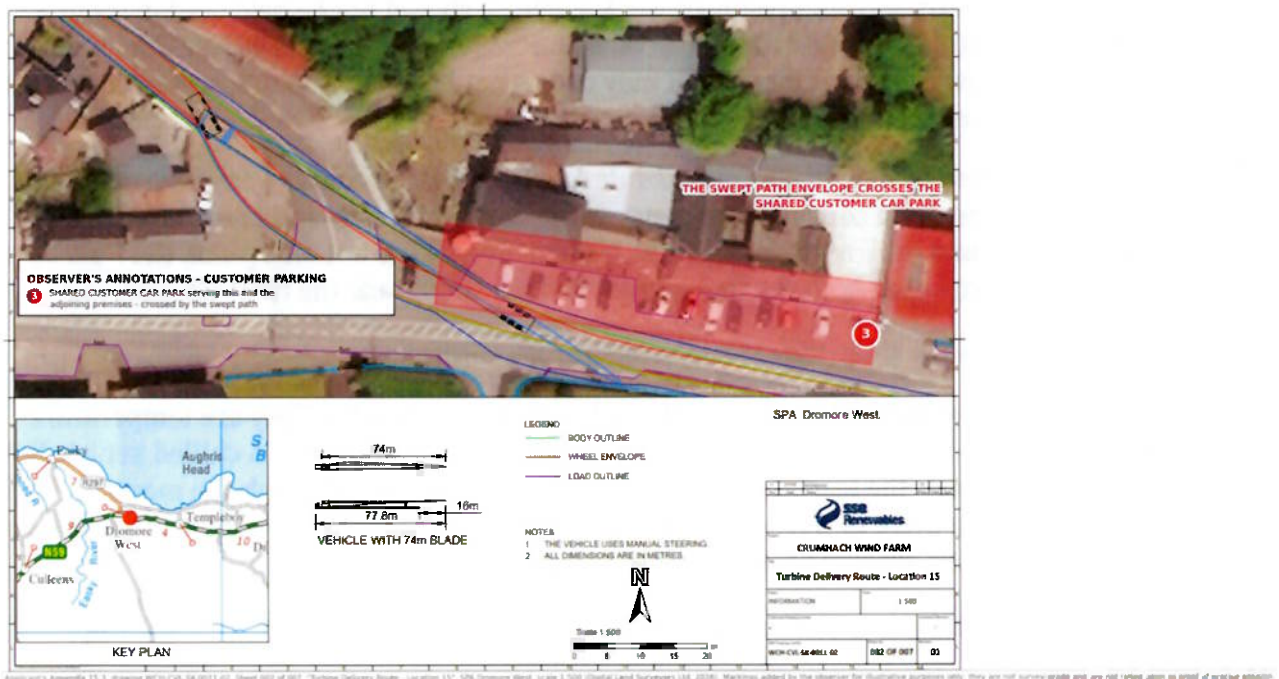


Figure 3 — The shared customer car park serving this and the adjoining premises, marked by the observer on the applicant's swept path drawing for Location 15. The applicant's plotted body, wheel and load envelopes cross it.

A vehicle of that length cannot execute the manoeuvre with cars parked within the envelope. The car park must therefore be cleared and closed for each passage of a turbine load, which on the applicant's own figures means a minimum of 45 occasions over nine weeks, and on Chapter 15's account 136 abnormal loads in convoys of three or four.

The consequences are as follows:

- Our customers, and those of the adjoining premises, will have nowhere to park.
- We have identified no statement of the duration of each closure, the notice required, who must clear the car park, or what becomes of a vehicle left in it.
- We have identified no alternative parking provision.
- Because the facility is shared, each closure affects several businesses, none of which appears as a receptor in the EIAR.

- Because no clock time is stated for convoy movements, we cannot tell customers when parking will be unavailable.

Taken together, a customer-facing business loses its parking on an unstated number of occasions, at unstated times, for an unstated duration, with no alternative identified, and the Traffic Management Plan does not mention car parking, businesses or premises.

No commercial receptor has been identified in this EIAR, and so no effect on one has been assessed. We have quantified the anticipated effect on our business on a gross profit basis. As that involves commercially sensitive trading information we do not set it out publicly, but will provide it to the Commission on request or at an oral hearing.

5. Disruption to utility services

We set out first what the application provides, and then why it does not answer the point.

5.1 What the application provides

We begin with what the application does contain, so that the limits of our case are clear.

The EIAR expressly contemplates that turbine delivery may require electricity infrastructure to be moved. Chapter 15, section 15.1.9 (MKO, 2026e, p. 15-63):

“In some cases, minor accommodation works are required along the turbine delivery route such as hedge or tree cutting, **temporary relocation of powerlines/poles**, lampposts, signage, local road widening...”

It offers two procedural safeguards capable, on their face, of applying. Chapter 15 at section 15.3 (MKO, 2026e, p. 15-125), repeated as mitigation measure MM119 (MKO, 2026g, p. 18-89), provides:

“When activities must be carried out beneath overhead lines, e.g. **component delivery** or grid cable laying, a site-specific risk assessment will be undertaken prior to any works... Overhead line proximity detection equipment will be fitted to machinery when such works are required.”

And mitigation measure MM120 (MKO, 2026g, p. 18-90) provides:

“In advance of any construction activity, the contractor will undertake pre-commencement surveys to confirm the presence or otherwise of any services such as water supply. If found to be present, the relevant service provider will be consulted with in order to determine the requirement for specific excavation or relocation methods and to schedule a suitable time to carry out works.”

The applicant has not ignored utilities. Our objection concerns the nature and timing of what is offered.

5.2 Why those provisions do not answer the point

Three difficulties arise, each a matter for the Commission rather than the contractor.

First, these are commitments to assess later rather than assessments. A risk assessment “prior to any works” and a survey to “confirm the presence or otherwise of any services” are undertakings to find out after permission is granted. The EIA Directive requires likely significant effects to be identified and assessed before consent, and does not permit them to be deferred to a contractor’s method

statement. On the applicant's own account it does not yet know whether any pole, line or main on the route is affected.

Second, the measures address the safety of the works rather than continuity of supply to third parties. MM119 concerns proximity of plant to live conductors, through goal posts, six-metre barriers, proximity detection and operative training. Those measures protect the workforce. They do not protect a premises whose supply is cut while a pole is moved. We have identified no notification or service-continuity obligation, no restoration timescale and no allocation of cost in favour of a connected premises.

Third, there is no baseline against which either measure can operate. Section 15.3.3.1, which establishes the utilities baseline, is scoped throughout to the wind farm site and the grid connection route:

Electricity: "There are no 110kV or 38kV overhead lines (OHL) **within or adjacent to the Proposed Wind Farm. The Proposed Grid Connection Route** passes under 4 no. 110kV OHLs..."

Gas: "There are no underground gas lines **within or adjacent to the Proposed Wind Farm or Proposed Grid Connection Route...**"

Water: "There is also existing Uisce Éireann infrastructure elements within the public road corridor **along the Proposed Grid Connection Route...**"

The turbine delivery route is neither of those. It is a third element of the project, running from Killybegs to the site through Dromore West, and no utilities baseline has been established for it. The EIAR therefore contemplates relocating powerlines along a corridor whose poles, lines, cables and mains it has not identified, at locations it has not named, affecting premises it has not counted.

We have not identified in the application any pole, overhead line, underground cable or water main on the delivery route; any estimate of the number or duration of interruptions; any assessment of the effect of an interruption on a premises dependent on supply; or any obligation to notify, protect or compensate one.

5.3 Why this matters to these premises

A fuel forecourt cannot trade without electricity. The dispensing pumps, tills, tank gauging and forecourt lighting depend on supply, and tank gauging is subject to statutory obligations relating to the storage of fuel. Card payment, electronic point-of-sale and stock ordering depend in turn on a data connection. An interruption stops trade at these premises altogether.

We are aware, from another observation on this application, that electricity and telecommunications poles have been identified alongside the delivery route where they may lie within or close to the area swept by the blade and load envelope, and that their relationship to the swept path is unresolved on the submitted drawings. If a pole carrying supply to either premises requires relocation, temporary removal or disconnection to permit a turbine to pass, the Commission should have that information before it now rather than leave it to a contractor to discover on the night.

5.4 Utility safeguards requested

- A survey of all buried and overhead services at every accommodation works location and along the full grid connection route, with a schedule of third-party utility crossings.
- A survey-grade drawing showing all electricity and telecommunications poles and overhead services relative to the wheel, vehicle body and blade/load envelopes at this junction, with the clearance available.

- Where any pole, line or service requires temporary or permanent removal, relocation, protection or disconnection: the works, the approvals required, the nature and duration of any interruption, and the measures to maintain supply.
- Advance written notice to affected premises of any planned interruption, with a service continuity obligation and reinstatement at the developer's cost.
- A written protocol for any interruption to electricity, water or telecommunications supply caused by the works, providing for advance notice, a maximum duration, and restoration at the developer's cost.

6. Reinstatement: how the road, verge and boundary conditions are to be returned

6.1 What the applicant commits to

We record what we have identified, so that the extent of the commitment is clear.

Traffic Management Plan, Section 6 provides for a *"Pre and Post Construction Condition Survey"* documenting road condition before and after construction, with *"re-instatement to pre-development condition, as agreed with the local authority engineers."*

Chapter 18, the Schedule of Mitigation and Monitoring Measures, provides for pre- and post-construction road condition surveys where required by the local authority, and states that road surfaces and boundaries will be reinstated to pre-development condition.

The Design Flexibility Form (MKO, 2026j) states that *"Temporary accommodation works associated with the turbine delivery route are contained within the public road corridor and will be reinstated following the construction stage."*

Appendix 4-7 specifies the cable trench reinstatement method (MKO, 2026i, p. 18): immediate permanent reinstatement for concrete and asphalt sections, and for unsurfaced or grass sections, backfill with suitable excavated material *"allowing for seeding or replace turves"*.

6.1A The grid connection is protected. The delivery route is not.

The gap can be seen by setting the applicant's two reinstatement regimes side by side. Both appear in Chapter 15, and only one applies to the works outside our door.

	Grid connection trenching	Turbine delivery accommodation works
Consent instrument	Road Opening Licence — <i>"a formal process through which the specific requirements of the Road Authority will be agreed"</i>	None identified
Reinstatement standard	<i>"in line with the specification of the Road Section of Sligo County Council"</i>	<i>"reinstated to the pre-delivery condition"</i> — no specification named
Code of practice	<i>Guidelines for Managing Openings in Public Roads, 2017</i> — <i>"The Applicant agrees with this condition"</i>	None identified

	Grid connection trenching	Turbine delivery accommodation works
Financial security	<i>“reinstatement fees, that are held for a minimum of two years following the completion of works”</i>	None identified
Record of works	Location of cables recorded, <i>“lodged with the local authority and with ESB Networks”</i>	None identified
Condition survey	—	<i>“Where required by the local authority”</i>
Timescale	Controlled by the Road Opening Licence process	<i>“following the construction stage”</i>

Sources: MKO (2026e), Table 15-1b (Department of Transport scoping responses 2, 9, 14 and 15); Chapter 15, section 15.1.10 (MKO, 2026e, p. 15-63); Chapter 15, section 15.1.15.5.2 (MKO, 2026e, p. 15-96).

The applicant therefore accepts a licensing regime, a named specification, a published code of practice and a two-year financial retention for works along the grid route, and offers none of the four at our frontage, where an 80-metre vehicle crosses a car park.

We do not suggest the grid connection regime is excessive. We suggest it is the correct model, and ask that it be applied to the delivery route by condition.

6.2 The gaps we have identified

The condition survey appears to be conditional. Chapter 18 offers it *where required by the local authority*. In the absence of such a requirement, we have identified no obligation to carry one out.

The affected premises is not a party to reinstatement, which is *“as agreed with the local authority engineers”*. We have identified no procedure by which an affected business or landowner may inspect, comment on or dispute reinstatement of its own frontage, entrance or boundary.

There is no reinstatement specification for the accommodation works as distinct from the cable trench. The trench has a stated method. The accommodation works, which may involve hedgerow removal, wall removal, overrun hardstand preparation, regrading and visibility splays, have no specification, no standard and no timescale.

No timescale is given beyond “following the construction stage”. Turbine delivery occupies nine weeks within a construction period the applicant describes as approximately 18 to 24 months; a premises could therefore face altered road geometry, removed boundaries and temporary hardstanding at its junction for much of two years.

We have identified no provision for reinstatement of drainage, verge levels, road edge or surface water flow paths at accommodation works locations, as distinct from the road surface itself.

6.3 An apparent inconsistency the Commission should resolve

The Design Flexibility Form (MKO, 2026j) states that turbine delivery route accommodation works are *“contained within the public road corridor”*.

Chapter 4 at section 4.5.3.1 and Chapter 15 at section 15.1.10 nonetheless describe the following among the twenty numbered locations:

Location 14 — N59 Abbeytown Bend: “temporary alterations will be required to the existing streetscape **and adjacent private lands**... including removal of street furniture **and private wall**”

Location 16 — Dromore West: “temporary alterations will be required to the existing streetscape **and adjacent private lands**... including **removal of private wall**. This private wall will be reinstated **2 metres from the edge of the existing carriageway**”

Location 17 — Dromore West Turn South: “temporary alterations will be required to the existing streetscape **and adjacent private lands**... including removal of hedgerow vegetation”

Location 18 — Right Bend in L2702: “temporary alterations... **and adjacent private lands**... including removal of a **private wall** and vegetation. An area will be required to be cleared and prepared for vehicle axle load to pass over **private lands** to the east of the L2702”

Location 19 — Left Bend in L2702: “temporary alterations will be required to the existing streetscape **and adjacent private lands**... including removal of vegetation”

Five of the twenty locations refer expressly to private lands, and three to the removal of a private wall. Those descriptions are inconsistent with the statement that the works are contained within the public road corridor. At Location 16 the applicant proposes that a private wall be rebuilt two metres back from the carriageway, which is a permanent change to a boundary rather than a temporary accommodation work.

We ask the Commission to require the applicant to state, location by location, the extent of land outside the public road corridor required, in whose ownership it lies, and on what legal basis it is to be taken, including in respect of the shared customer car park at Location 15.

6.4 Reinstatement safeguards requested

- A statement of the condition to which the footpath, kerbs, street furniture and signage at Location 15 will be reinstated following the turbine deliveries, the specification to be applied, and the timescale.
 - A dated photographic and measured pre-construction condition survey of our roadside boundary, entrance, forecourt access, staff car park entrance, verge, drainage and the adjoining public road, at the developer's cost and by an agreed independent surveyor, irrespective of whether the local authority requires one.
 - A corresponding post-construction survey after the final abnormal load and after reinstatement, with project-related damage made good promptly at the developer's expense.
 - A written reinstatement specification for the accommodation works, covering road surface, verge levels, road edge, boundary features, vegetation, drainage capacity and surface water flow paths.
 - A defined timescale for reinstatement following the final turbine delivery, rather than “following the construction stage”.
 - A schedule relating each numbered turbine delivery route location to its road number and townland, and confirmation of whether any works fall outside the public road corridor.
 - For the avoidance of doubt, nothing in this observation grants any permission, consent, licence, easement, access right, oversail right or other civil right over our property. Any such rights are expressly reserved and are separate from the planning process.
-

7. No commercial premises is identified as a receptor

Chapter 5 defines its receptors at section 5.2.3.5 (MKO, 2026b): *"All inhabitable dwellings within 1.5km of the Proposed Turbines have been considered."*

The commercial and services baseline appears to be a single sentence, at section 5.3.8 (MKO, 2026b): *"The main services are located within the town of Ballysadare, which lies approximately 28km east of the Proposed Project."*

Chapter 12 (MKO, 2026d) defines a noise-sensitive location broadly, as *"Any dwelling house, hotel or hostel, health building, educational establishment, place of worship or entertainment, or any other facility or other area of high amenity which for its proper enjoyment requires the absence of noise at nuisance levels"*, but records that *"All with the exception of location 5 ... (Lough Easky Water Treatment Plant) are residential properties."* Appendix 12-2 (MKO, 2026l) records that *"90 of the buildings are residential and classed as NSRs."*

We have not identified any reference to a business, shop, retail premises, forecourt, shop frontage, customer parking or commercial access in the Traffic Management Plan (MKO, 2026k). Section 6, which lists the general traffic management measures, contains no measure we can identify addressing access to private property, businesses or premises.

Chapter 17, on interactions (MKO, 2026f), states that construction traffic is *"likely to create some short-term inconvenience for other road users as well as dust and exhaust emissions."* The affected population is treated as road users only.

Assessment of effects on businesses is not unusual in an Irish wind farm EIAR. Chapter 17 of the Tirawley Wind Farm EIAR (Tirawley Wind Farm Ltd, 2023) assesses a *"slight, negative, temporary effect on residents, businesses and road users due to increased noise and vibration... increased journey times and delays due to temporary traffic management"*, and commits to pre- and post-construction road condition surveys, a road bond lodged with the local authority and weekly inspection by a Resident Engineer.

8. This has happened before: the 2023 N59 closure diverted via the R297

N59 traffic has been routed onto the R297 before, in 2023, under a diversion administered by Sligo County Council.

The N59 was closed at Owenbeg townland, west Co. Sligo, close to its junction with the R297, under a temporary closure listed on the Council's public notices as "Road Closure – National Road N59 at Owenbeg". The statutory period ran from Tuesday 6 June 2023 to Tuesday 12 September 2023, for resurfacing and road improvement works forming part of a €5.5 million scheme. The road reopened early, on 28 July 2023, when *"regional road diversions in the area were lifted"*, with accommodation works continuing for some weeks.

The signed diversion was via the R297 and R298 regional roads through Easkey village.

Sligo County Council therefore holds a signed diversion route drawing and traffic management plan for this movement, recording how N59 traffic was routed onto the R297, the signage used and the distance involved. We have not identified any reference to it, or to the 2023 closure, in the applicant's submitted documents. An applicant proposing to run 74-metre abnormal loads onto the same regional road might reasonably have been expected to consult it.

That diversion affected the businesses on this stretch of road, including ours. We experienced a significant drop in turnover during that period, caused by the frustration to road users in the area, and we will speak to it at an oral hearing. That experience is direct local evidence of the effect of diverting N59 traffic in this area on a roadside forecourt, and the applicant could have sought it but did not.

Separately, the R297 at Knockacullen required road strengthening works in May 2025, recorded in the Council's own traffic reports. Knockaculleen is the townland in which the applicant now seeks accommodation works for 74-metre blade loads. A regional road that required strengthening in 2025 cannot be assumed to be capable of carrying the heaviest loads on this project, and we have not identified any structural or pavement assessment of that road in the application.

Sources: Sligo County Council (2023); Ocean FM (2023a); Ocean FM (2023b); Sligo County Council (2025).

9. The documented effect of road disruption on roadside trade

There is published evidence of the effect of traffic management on roadside retail, and on fuel forecourts in particular.

Transport research establishes that service stations are among the businesses whose turnover is most sensitive to diverted or impeded passing traffic. Andersen *et al.* (1993, p. 5) record that “*non-traffic-oriented businesses had experienced increases in annual gross sales, whereas many traffic-serving businesses, such as service stations and motels, showed large decreases.*” We cite that study for the principle rather than for its figures, which concern permanent diversion.

We have not found a published Irish account of a forecourt trading through comparable works, and so refer to two recent cases from the United Kingdom, where the trade press reports such matters. Both show that the perception of closure suppresses forecourt trade even where physical access remains.

At Chaddesley Fuel Station on the A448 near Kidderminster, Worcestershire, customer numbers fell during a Severn Trent water main replacement from approximately 1,100 per day to approximately 600 per day, some 45%, while the site remained reachable. The operator described what had happened (Forecourt Trader, 2024):

“You can still get to us via country lanes but really only if you know the roads... we are on the main road from Bromsgrove to Kidderminster and are usually busy with passing trade but not at the moment.”

At Willesborough Service Station, Hythe Road, Ashford, Kent, an eight-week closure for SGN gas mains replacement, followed by UK Power Networks upgrades, affected a site typically pumping around 18,000 litres of fuel per day (Forecourt Trader, 2025):

“I am looking outside now, while I speak to you, and the forecourt is completely empty. The shop is empty too.”

The operator attributed the collapse to “*road closed*’ signs two miles away” having “*put drivers off from using it*”. Signage well beyond the works deterred drivers who could still reach the site.

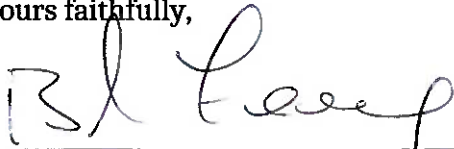
The same conditions arise from escorted convoys, stop-and-go control and advance “road closed” or “delays” signage at a junction 100 to 200 metres from a forecourt. Neither site was physically cut off, and both lost roughly half their trade.

The regulatory context is relevant. In Ireland, Chapter 8 of the Traffic Signs Manual requires at section 8.1.3.5 that *"All reasonable steps should be taken to ensure that the disruption due to the works is minimised"* (Department of Transport, Tourism and Sport, 2019, §8.1.3.5). Beyond that, we have not identified in Chapter 8 or in the *Guidelines for Managing Openings in Public Roads* (Department of Transport, Tourism and Sport, 2017) any express requirement to maintain access to adjoining businesses or premises, any maximum duration for stop-and-go working, or any requirement to notify affected businesses. The equivalent United Kingdom code requires that a road closure maintain *"vehicular access to all properties and premises within the closure area"* (Department for Transport, 2013, pp. 70–71).

Compliance with Irish standard guidance will not therefore secure access to our premises, because Irish guidance does not require it. We ask that access be secured expressly by condition.

We request an oral hearing.

Yours faithfully,



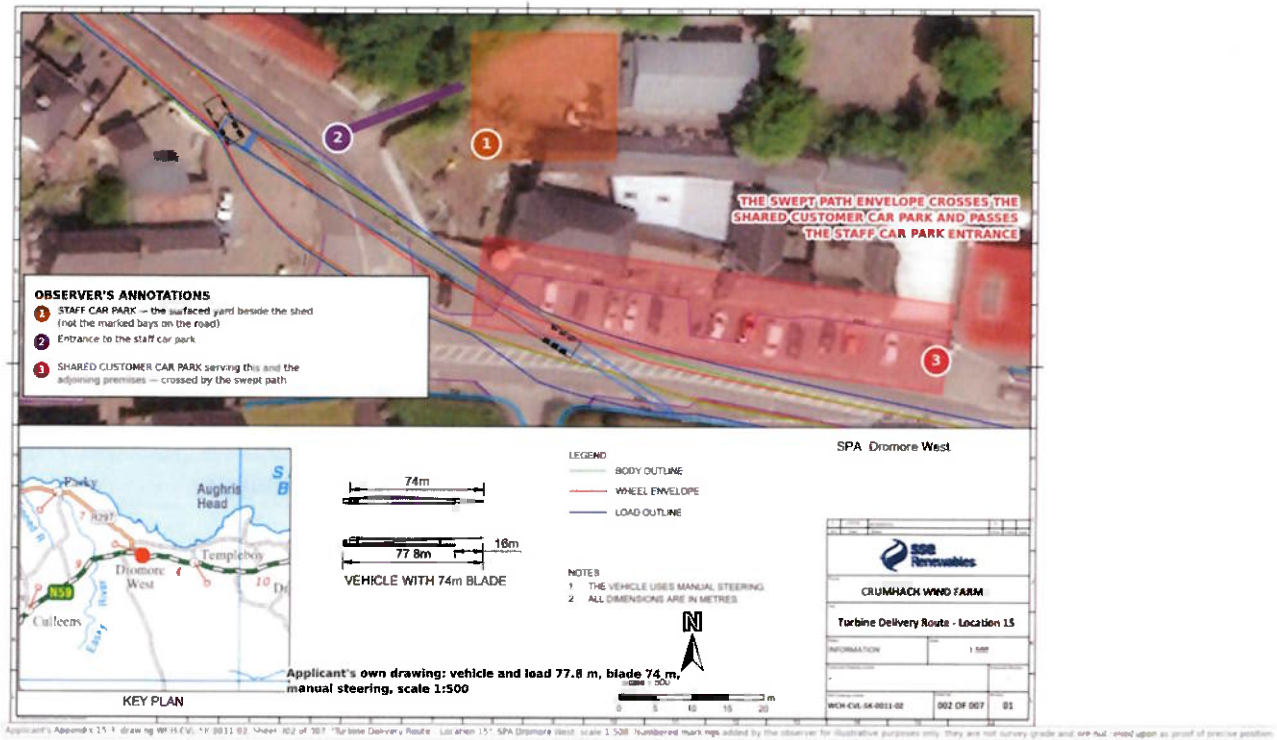
For and on behalf of Blair Feeney Limited

Name (block capitals): BLAIR FEENEY.

Position: DIRECTOR AND COMPANY SECRETARY.

Date: 18-09-2026

Appendix A — Extract from Appendix 15-3, Autotrack Assessment Drawings



Applicant's Appendix 15-3, drawing WCH-CVL-SK-0011-02, Sheet 002 of 007, "Turbine Delivery Route – Location 15", SPA Dromore West, scale 1:500. The observer's staff car park is the property between grid references 11 and 12 at the top of the drawing. Coloured markings added by the observer for illustrative purposes only; they are not survey-grade and are not relied upon as proof of precise position. The underlying drawing, the swept path envelopes and the stated vehicle dimensions are the applicant's own.

Appendix B — References

Sources are cited in the text by author and year in the Harvard style. Where a source is one chapter or appendix of the applicant's Environmental Impact Assessment Report, the year is followed by a letter identifying the chapter, and the page number given is the page number printed on that chapter, in the applicant's own format (for example, p. 15-63 is page 63 of Chapter 15). Each document title below is a hyperlink to the document as published on the applicant's planning website.

B.1 Citation key to the applicant's documents

In-text citation	Document
MKO, 2026a	EIAR Chapter 4 — Description of the Proposed Project
MKO, 2026b	EIAR Chapter 5 — Population and Human Health
MKO, 2026c	EIAR Chapter 10 — Air Quality
MKO, 2026d	EIAR Chapter 12 — Noise and Vibration

In-text citation	Document
MKO, 2026e	<u>EIAR Chapter 15 — Material Assets</u>
MKO, 2026f	<u>EIAR Chapter 17 — Interaction of the Foregoing</u>
MKO, 2026g	<u>EIAR Chapter 18 — Schedule of Mitigation and Monitoring Measures</u>
MKO, 2026h	<u>EIAR Appendix 15-4 — Road Safety Audit</u>
MKO, 2026i	<u>EIAR Appendix 4-7 — 110kV Grid Connection Construction Methodology</u>
MKO, 2026j	<u>Design Flexibility Form</u>
MKO, 2026k	<u>EIAR Appendix 15-2 — Traffic Management Plan</u>
MKO, 2026l	<u>EIAR Appendix 12-2 — Operational Noise Report</u>
MKO, 2026m	<u>EIAR Non-Technical Summary</u>
MKO, 2026n	<u>Planning Report</u>
MKO, 2026o	<u>EIAR Appendix 12-1 — Construction Noise Report</u>
Digital Land Surveyors Ltd, 2026	<u>EIAR Appendix 15-3 — Autotrack Assessment Drawings</u>
SSE Renewables, 2026	<u>Statutory site notice</u>

All of the above are published by the applicant at crumhachwfplanning.com. The case file is at [An Coimisiún Pleanála, Case 324561](#).

B.2 Application documents

Digital Land Surveyors Ltd (2026) Appendix 15-3: Autotrack Assessment Drawings. Crumhach Wind Farm, Co. Sligo. Drawing series WCH-CVL-SK-0011-01 to -07, Sheets 001 to 007 of 007, scale 1:500. Prepared for SSE Renewables (Ireland) Ltd.

McCarthy Keville O'Sullivan Ltd (MKO) (2026a) Environmental Impact Assessment Report, Chapter 4: Description of the Proposed Project. Final, 7 August 2026, project 230841. Galway: MKO, on behalf of SSE Renewables (Ireland) Ltd.

MKO (2026b) Environmental Impact Assessment Report, Chapter 5: Population and Human Health. Final, 7 August 2026. Galway: MKO.

MKO (2026c) Environmental Impact Assessment Report, Chapter 10: Air Quality. Final, 7 August 2026. Galway: MKO.

MKO (2026d) Environmental Impact Assessment Report, Chapter 12: Noise and Vibration. Final, 7 August 2026. Galway: MKO.

MKO (2026e) Environmental Impact Assessment Report, Chapter 15: Material Assets. Final, 7 August 2026. Galway: MKO.

MKO (2026f) Environmental Impact Assessment Report, Chapter 17: Interaction of the Foregoing. Final, 7 August 2026. Galway: MKO.

MKO (2026g) Environmental Impact Assessment Report, Chapter 18: Schedule of Mitigation and Monitoring Measures. Final, 7 August 2026. Galway: MKO.

MKO (2026h) Appendix 15-4: Road Safety Audit. Stage 1 audit dated 21 April 2026. Galway: MKO.

MKO (2026i) Appendix 4-7: 110kV Grid Connection Construction Methodology. Galway: MKO.

MKO (2026j) Design Flexibility Form. Galway: MKO.

MKO (2026k) Appendix 15-2: Traffic Management Plan. Galway: MKO.

MKO (2026l) Appendix 12-2: Operational Noise Report. Galway: MKO.

MKO (2026m) Environmental Impact Assessment Report: Non-Technical Summary. Final, 7 August 2026. Galway: MKO.

MKO (2026n) Planning Report. Galway: MKO.

MKO (2026o) Appendix 12-1: Construction Noise Report. Galway: MKO.

SSE Renewables (Ireland) Ltd (2026) Statutory site notice, application under section 37E of the Planning and Development Act 2000 (as amended). An Coimisiún Pleanála case 324561.

B.3 Case law

Ecologistas en Acción-CODA v Ayuntamiento de Madrid (Case C-142/07) [2008] ECR I-6097, Court of Justice of the European Union, 25 July 2008.

North Westmeath Turbine Action Group v An Bord Pleanála; Sweetman v An Bord Pleanála [2025] IEHC 367, Quinn J, High Court of Ireland, 16 June 2025.

O'Grianna v An Bord Pleanála [2014] IEHC 632, High Court of Ireland.

B.4 Legislation and directives

Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment, as amended by Directive 2014/52/EU.

Planning and Development Act 2000 (No. 30 of 2000), as amended, section 37E.

Roads Act 1993 (No. 14 of 1993), section 75.

B.5 Standards, codes and guidance

Department for Transport (2013) Safety at Street Works and Road Works: A Code of Practice. London: The Stationery Office.

Department of Transport, Tourism and Sport (2017) Guidelines for Managing Openings in Public Roads. Dublin: DTTAS.

Department of Transport, Tourism and Sport (2019) Traffic Signs Manual, Chapter 8: Temporary Traffic Measures and Signs for Roadworks. Dublin: DTTAS.

B.6 Research and comparator material

Andersen, S.J., Mahmassani, H.S., Helaakoski, R., Euritt, M.A., Walton, C.M. and Harrison, R. (1993) 'Economic impact of highway bypasses', *Transportation Research Record*, 1395, pp. 1–10. Washington, DC: Transportation Research Board.

Tirawley Wind Farm Ltd (2023) *Environmental Impact Assessment Report, Chapter 17: Interaction of the Foregoing. Tirawley Wind Farm, Co. Mayo*. Planning application documents.

B.7 News and trade press

Forecourt Trader (2024) 'Roadworks cut forecourt trade almost in half'.

Forecourt Trader (2025) 'Roadworks decimate Kent forecourt's business'.

Ocean FM (2023a) 'Section of Sligo to Ballina road is closed for resurfacing works', 12 June 2023.

Ocean FM (2023b) 'Major road project in west Sligo finished ahead of schedule', 28 July 2023.

B.8 Local authority material

Sligo County Council (2023) Public notice: Road Closure — National Road N59 at Owenbeg.
Temporary closure, 6 June 2023 to 12 September 2023.

Sligo County Council (2025) *Traffic Report, May 2025*. Sligo: Sligo County Council.

B.9 Note on sources we have not been able to obtain

We record, for completeness, that the following material is referred to in the application but was not available to us when preparing this observation, and that our statements about it are therefore limited to what the accompanying documents disclose: the delivery programme to be submitted to Sligo County Council; the finalised Traffic Management Plan to be agreed with the local authority and An Garda Síochána; the Construction Environmental Management Plan in its final form; and the confirmatory delivery assessment to be carried out by the turbine delivery company.