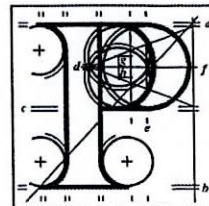


Our Case Number: ABP-309770-21



**An
Bord
Pleanála**

~Transport Infrastructure Ireland (TII)
Parkgate Business Centre
Parkgate Street
Dublin 8

Date: 28 February 2023

Re: Proposed development of up to 15 wind turbines with a tip height of up to 175 metres and laying of approximately 26km of underground electricity cabling to facilitate the connection to the national grid, and all associated site development works
Townlands of Camagh, Carlanstown, Coole, Clonrobert, Clonsura, Doon, Monktown, Mullagh, Newcastle and other townlands, Co. Westmeath

Dear Sir / Madam,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of Westmeath County Council and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

PA09

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bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Niamh Thornton

From: SIDS
Sent: Friday 24 February 2023 12:49
To: Niamh Thornton
Subject: FW: ABP Case ref. PA25M.309770 (Coole Wind Farm Limited)
Attachments: ABP Case ref. PA25M.309770.pdf

From: Landuse Planning <LandUsePlanning@tii.ie>
Sent: Friday 24 February 2023 11:47
To: SIDS <sids@pleanala.ie>
Subject: ABP Case ref. PA25M.309770 (Coole Wind Farm Limited)

Dear Sir/Madam,

Please find attached a copy of TII's observations on the Further Information submitted in relation to the above Strategic Infrastructure Development Application.

Yours sincerely,
Michael McCormack
Senior Land Use Planner

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

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

by e.mail; sids@pleanala.ie

Dáta | Date
24 February, 2023

Ár dTag | Our Ref.
TII23-121723

Re. Strategic Infrastructure Development – Proposed development of up to 15 wind turbines with a tip height of up to 175 metres and laying of approximately 26km of underground electricity cabling and all associated site development works at Coole, etc., Co. Westmeath

ABP Case ref. PA25M.309770

Dear Secretary,

The Authority acknowledges receipt of referral of Further Information in relation to the above Strategic Infrastructure Development application. Following a review of the Further Information referred, the Authority advises that the position set out in TII's initial submission of 14 May, 2021, to the Board on this application remains TII's position.

The proposed grid connection routing outlined in the planning application includes for a proposed grid connection routing between the Coole Windfarm Development Site and the Mullingar Substation. The grid connection routing outlined in the initial application and referred to as Option A Grid Connection Cable Routing includes approx. 3.4 km of cabling on the N4 national road, including four proposed joint bays; joint bays no. 26 – 29.

As outlined in TII's initial submission on this application, 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;

- 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.

The applicant has submitted a technical report as part of the Further Information response compiled by Ionic Consulting Ltd. and titled '*Coole Wind Farm - 110kV Grid Route Connection - RFI: TII Submission, N4 National Road, Co. Westmeath*' to address issues raised in TII's initial submission.

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag www.tii.ie.
TII processes personal data in accordance with its Data Protection Notice available at www.tii.ie.

Following a review of the submitted technical report, the Authority considers that matters impacting the future maintenance and improvement of the existing N4, national primary road, as well as providing for the NDP Investment Objective N4 Mullingar to Longford Scheme, all of which were identified in TII's initial submission on the application, remain relevant and largely unaddressed.

As such, in the interests of safeguarding the investment in and the potential for future maintenance, improvement and upgrade works to the national road network, the Authority remains of the opinion that Option A Grid Connection Cable Routing fails to address important policy considerations impacting national roads.

TII notes that the initial Strategic Infrastructure Development application outlined an alternative cable routing proposal which appears to remain unaffected by the Further Information submission; Option B, to the west of Lough Owel, has a crossing point of the N4 at Bunbrosna but otherwise significantly less interactions with the strategic national road network than Option A.

In TII's opinion, Option B represents less implications for the management, maintenance and improvement of the strategic national road network in the area in accordance with NPF National Strategic Outcome no. 2 and the provisions of the National Development Plan and the National Investment Framework for Transport in Ireland which both identify the need to maintain and optimise current assets. TII respectfully requests that this opinion is factored into considerations in the assessment of the subject application by the Board.

Further, and without prejudice, TII advises that the other matters addressed in TII's initial submission under item 2 'National Road Network Maintenance and Safety' relating to the proposed haul route, national road structures, etc., continue to remain the Authority's position on this proposed development application.

A licence may be required from the road authority for any trenching or cabling proposals on the road network. Cable routing, where it may cross the national road, should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, 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.

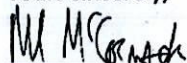
Conclusion

TII considers that the cable routing proposals included as part of the proposed development and identified as Option A Grid Connection Cable Routing represent significant policy and network management, maintenance and upgrade issues for both the existing national road network and national road scheme planning in the area. Viable alternatives to the laying of high voltage cabling in the national road network, in conflict with the provisions of official policy, to the extent proposed in Option A appear available to the applicant.

In TII's opinion, the issues potentially arising to the existing and planned national road network in the area resulting from Option A Grid Connection Cable Routing are to such an extent as to represent a significant conflict with official Government policy related to the National Planning Framework National Strategic Outcome no. 2 'Enhanced Regional Accessibility' as well as national road scheme investment objectives included in the National Development Plan, 2021 – 2030, relating to the N4 Mullingar to Longford Scheme.

I trust the above observations are of assistance to the Board and it is respectfully requested that they are taken into consideration prior to any decision on the subject application.

Yours sincerely,



Michael McCormack
Senior Land Use Planner