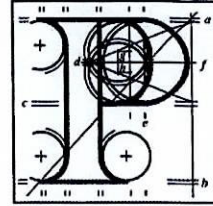


Our Case Number: ABP-309770-21



**An
Bord
Pleanála**

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

Date: 18 May 2021

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

Tell	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Niamh Thornton

From: SIDS
Sent: Friday 14 May 2021 11:53
To: Niamh Thornton
Subject: FW: ABP Case ref. PA25M.309770 (Coole Windfarm Limited)
Attachments: Coole Windfarm SID.pdf

From: Landuse Planning <LandUsePlanning@tii.ie>
Sent: Friday 14 May 2021 11:32
To: SIDS <sids@pleanala.ie>
Subject: ABP Case ref. PA25M.309770 (Coole Windfarm Limited)

Dear Sir/Madam,

Please find attached a copy of TII's observations on the above Strategic Infrastructure Development application.

Yours sincerely,
Michael McCormack
Senior Land Use Planner

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Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag <http://www.tii.ie/about/>

TII E-mail system: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error then please notify postmaster@tii.ie and delete the original including attachments.

Córas r-phoist BIE: Tá an ríomhphost seo agus aon chomhaid a tharchuirtear leis faoi rún agus beartaithe lena n-úsáid ag an duine aonair nó ag an eintiteas a bhfuil siad dírithe chuige/chuici amháin. Más rud é go bhfuair tú an ríomhphost seo trí bhotún, cuir sin in iúil do postmaster@tii.ie, le do thoil, agus scrios an ríomhphost bunaidh agus aon cheangaltáin.

The Secretary
An Bord Pleanála
64 Marlborough St.
Dublin 1

by e.mail; sids@pleanala.ie

Dáta | Date
14 May, 2021

Ár dTag | Our Ref.
TII21-112941

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 to facilitate the connection to the national grid, 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 the above Strategic Infrastructure Development application and provides the following observations for the Boards consideration;

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.

1. Official Policy

The Board 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). Official policy addresses both future national road scheme planning and the existing national road network.

1.1 Future National Road Scheme Planning

The N4, national primary road, is part of the EU TEN-T Comprehensive Network.

Section 14.1.1.4 of the EIAR identifies that a highway improvement scheme is being progressed by Westmeath County Council, Longford County Council and TII, on the N4 between Mullingar and Longford (Roosky).

The EIAR considers the cumulative impact of the planned delivery of the Coole Windfarm and the N4 Scheme. However, the EIAR does not appear to consider the implications for the planning, design and delivery of the N4 national road scheme arising from the subject development proposal.

In that regard, the Board will note grid connection cable routing for 3.4km along the N4, national road, and 4 joint bays within the N4 road reservation included as part of the subject application.

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag www.tii.ie.
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The proposed works are included within the Constraints Study Area for the N4 Mullingar to Longford Scheme which is a national road investment objective of the National Development Plan giving effect to National Strategic Outcome no. 2 of the National Planning Framework 'Enhanced Regional Accessibility'. The applicant was made aware of this national road scheme planning constraint as part of TII's EIAR Scoping Consultation response to the applicant team.

Government policy included in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) clearly requires that development objectives should not compromise the route selection process, particularly in circumstances where road scheme planning is underway.

There are existing environmental designations such as Lough Owel SPA and SAC and Scragh Bog SAC in the constraints study area that N4 route options will have to address. Having regard to these designations, route corridor options in the vicinity of the existing N4 where the proposed grid connection cable routing is proposed are likely to be significantly constrained.

TII is of the opinion that introducing an additional constraint, represented by the cable routing and joint bay construction, into the N4 strategic road reservation to the extents proposed where road scheme planning is underway has the potential to compromise delivery of the National Development Plan investment objective for the N4 Mullingar to Longford Scheme and is contrary to the provisions of the DoECLG Spatial Planning and National Roads Guidelines (2012) and potentially increases the costs associated with the scheme delivery, contrary to the broader public interests and value for money.

TII is of the opinion that a grant of permission for grid connection cable routing to the extents proposed in the subject application is at variance with the provisions of official policy and is premature pending the determination of a road layout for the area to give effect to National Strategic Outcome no. 2 of the National Planning Framework and Government investment objectives included in the National Development Plan relating to the N4 Mullingar to Longford Scheme.

1.2 The Existing National Road Network

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 access to all turbine locations is facilitated via the local road network prior to access to the N4, national road.

However, grid connection cable routing proposals outlined in the application includes for a proposed grid connection routing between the Coole Windfarm Development Site and the Mullingar Substation. The grid connection routing includes approx. 3.4 km of cabling on the N4 national road, including four proposed joint bays; joint bays no. 26 – 29. This route option is identified as Option A in Section 3.7 of the EIAR. Limited detail in terms of construction of the joint bays or of cable laying in the national road reservation appears to be outlined.

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.

As indicated above, the N4, national road, is part of the EU TEN-T Comprehensive Network. This is a high level EU designation reflecting the important inter-regional connectivity provided by the national 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.

Proposals to lay cable and construct joint bays in the national road reservation, such as that outlined in grid connection Option A of the subject application, have the potential to impact road authorities and TII in undertaking future maintenance and improvement requirements to satisfy EU TEN-T Regulations. 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. The above concerns do not appear to have been factored into the applicants consideration of alternative cable routing proposals.

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

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 recent publication of the Draft National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

Therefore, there is a critical requirement to ensure the strategic capacity and safety of the national road network is maintained and significant Government investment already made in the national road network is safeguarded. TII is of the opinion that the proposed grid connection cable routing does not reflect the foregoing provisions of official policy.

2. National Road Network Maintenance and Safety

Notwithstanding the policy position outlined above in relation to grid connection cable routing, there are a number of additional operational issues related to the subject windfarm development proposal, in the Authority's opinion, that are required to be resolved to address concerns relating to network maintenance and road safety prior to any decision on this planning application:

2.1 Proposed Turbine Haul Route

▪ N4/M4

The Authority notes the proposals to deliver turbine components to site utilising the N4/M4 national primary road in the first instance.

The haul route assessment included in the EIAR identifies that an area of grass verge on the southern side of the N4 at the junction of N4/L1927 will require hard surfacing. The hard surfacing is indicated as being temporary and that the verge will be reinstated to its original condition post construction.

Any proposed works to the junction of the N4/L1927 shall comply with TII Publications and shall be subject to Road Safety Audit as appropriate. Subject to the outcome of Road Safety Audit, works should ensure the ongoing safety for all road users.

TII requests referral of all proposals agreed between the road authority and the applicant impacting on national roads. Mitigation measures identified by the applicant should be included as conditions in any decision to grant permission. Any damage caused to the pavement on 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, the haul route will commence at the port of delivery of turbine components. Documentation that accompanied the application indicate that the applicant has assessed the possibility of component delivery to three port options; Dublin, Waterford and Ringaskiddy.

The routes from Dublin, Waterford or Ringaskiddy Port have not been assessed in detail. However, the haul route from port of entry to the N4 will utilise the strategic national road network. The network being traversed is managed by a combination of PPP Concessions and 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 route traverses to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is safeguarded.

2.2 Structures

TII acknowledges that Section 14.1.1.1 of the EIAR that accompanied the subject application confirms that abnormal weight loads are not a feature of the turbine delivery vehicles and that all construction and delivery vehicles for the Proposed Development will be subject to the standard axle weight requirements set out under Road Traffic Regulations. Therefore the loadings from construction traffic will not exceed the relevant standards.

In the event that an abnormal weight load is proposed, all structures on the national road network which forms part of the delivery/haul route should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal weight load proposed.

2.3 Cabling/Trenching

TII considers that the proposed grid connection cable routing presents significant policy implications that have not been addressed in the subject application proposal.

As indicated above, TII is of the opinion that a grant of permission for grid connection cable routing to the extents proposed in the subject application is at variance with the provisions of official policy to safeguard the strategic function and investment in the existing strategic national road network and is premature pending the determination of a road layout for the area to give effect to National Strategic Outcome no. 2 of the National Planning Framework and Government investment objectives included in the National Development Plan relating to the N4 Mullingar to Longford Scheme.

Conclusion

It is requested that the above matters are taken into consideration prior to any decision on the subject application.

In particular, TII considers that the cable routing proposals included as part of the proposed development represents significant policy and network management and maintenance issues for both the existing national road network and national road scheme planning in the area.

In TII's opinion, the issues arising to the existing and planned national road network in the area 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'.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M McCormack', is written over a horizontal line.

Michael McCormack
Senior Land Use Planner