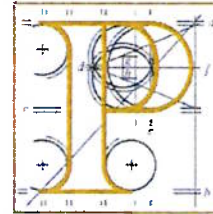


Our Case Number: ABP-316212-23



An
Bord
Pleanála

Transport Infrastructure Ireland
Land Use Planning
Parkgate Business Centre
Parkgate Street
Dublin 8
D08 DK10

Date: 09 February 2024

Re: Proposed development of 26 no. wind turbines and associated works.
at the Ballivor Bog Group, Co. Meath and 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 the local authority 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,

Ashling Doherty
Executive Officer
Direct Line: 01-8737160

PA09

Teil	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1800 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

Ashling Doherty

From: Landuse Planning <LandUsePlanning@tii.ie>
Sent: Wednesday 7 February 2024 13:54
To: SIDS
Subject: TII submission on FI_ref. ABP-316212-23_Bord na Móna Powergen LTD., TII ref. TII23-122554
Attachments: TII23-122554 - SID application for Ballivor Wind Farm, Meath & Westmeath, ABP ref. PA25M.316212_FI_TII submission issued 07.02.2024.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

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Dear Sir/Madam,

Please find attached a copy of TII's observation upon notice of significant further information for the above application.

Please acknowledge receipt of this submission.

Acknowledgements can be forwarded to landuseplanning@tii.ie.

Regards,

Cliona Ryan
Land Use Planner
Transport Infrastructure Ireland
Phone: +353 (0)1 646 0000
Land Use Planning Email: landuseplanning@tii.ie
Address: Parkgate Business Centre, Parkgate Place, Parkgate Street, Dublin 8, Ireland, D08 DK10



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.

De réir pholasáí BIÉ An Ceart gan a bheith Ceangailte, má tá an ríomhphost seo á fháil agat lasmuigh de na gnáthuaireanta oibre, nílím ag súil le freagra ná le gníomh uait lasmuigh de do ghnáthuaireanta oibre féin mura bhfuil sé ráite go soiléir go bhfuil gá gníomhú go práinneach.

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Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag <https://www.tii.ie/about/about-tii/Data-Protection/?set-lang=ga>

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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 scríos an ríomhphost bunaidh agus aon cheangaltáin.

Strategic Infrastructure Development Section
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Email: sids@pleanala.ie

Dáta | Date
07 February 2024

Ár dTag | Our Ref.
TII23-122554

Bhur dTag | Your Ref.
PA25M.316212

RE.: Proposed development of 26 wind turbines and associated works at Ballivor Bog Group, County Meath and County Westmeath

Significant Further Information

Dear Secretary,

Transport Infrastructure Ireland (TII) acknowledges referral of notice of significant further information received in respect of the above proposed Strategic Infrastructure Development application on behalf of Bord na Móna Powergen Ltd. (Applicant).

TII made submission to the proposal by letter dated 31st May 2023. TII has reviewed the significant further information and notes the inclusion of a report entitled *Response to Observations Received, Ballivor Wind Farm (ABP Ref. 316212)*, Rev. 01, dated 31.08.2023 by MKO. This report records third party and local authority submissions. This report does not therefore appear to include consideration of original TII submission.

A copy of the original TII made submission to the proposal by letter dated 31st May 2023 is enclosed. The observations and recommendations in that submission remains the position of the Authority.

Please acknowledge receipt of this correspondence.

Yours sincerely,



Cliona Ryan
Land Use Planner

Encls. Copy of original TII submission to proposed development under An Bord Pleanála ref. PA25M.316212, dated 31 May 2023
(TII ref. TII23-122554)

Strategic Infrastructure Development Section
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Email: sids@pleanala.ie

Dáta | Date
31 May 2023

Ár dTag | Our Ref.
TII23-122554

Bhur dTag | Your Ref.
PA25M.316212

RE.: Proposed development of 26 wind turbines and associated works at Ballivor Bog Group, County Meath and County Westmeath

Dear Secretary,

Transport Infrastructure Ireland (TII) acknowledges referral of the above proposed Strategic Infrastructure Development application on behalf of Bord na Móna Powergen Ltd. (Applicant) for 26 no. wind turbines and associated works over a stated site area of approximately 1,170 hectares (ha.) straddling the counties of Meath and Westmeath.

Grid connection for the development forms part of the submitted EIAR. Connection is proposed from a substation to form part of the proposed development that will connect to the existing Mullingar-Corduff 110 kV transmission line that traverses the development site.

Project Ireland 2040, National Development Plan 2021 - 2030, sets out the key sectoral priority of maintaining Ireland's existing national road network to a robust and safe standard for users. Government also includes the objective to maintain the strategic capacity and safety of the national roads network, including planning for future capacity enhancements, in National Strategic Outcome 2 of the *National Planning Framework*.

The national road network caters for Ireland's inter-urban and inter-regional transport requirements and gives access to regional and international markets through strategic airport and port locations. As part of this network, the M3 and M/N4 are highly important national roads proposed to form part of the haul routes for this proposal. The Authority's priorities in relation to existing national roads are the maintenance of the existing national road network, including junctions, safeguarding the Exchequer investment in national roads to date.

TII's observations seek to address the safety, capacity and strategic function of the national road network in accordance with TII's statutory functions and the provisions of official policy outlined in the Section 28 *Guidelines Spatial Planning and National Roads Guidelines for Planning Authorities* (2012) and the *EMRA Regional Spatial and Economic Strategy* (RSES). The maintenance and protection of the strategic function of the national road networks and associated junctions are amongst the guiding principles of the transport strategy of the RSES at *Regional Policy Objective* (RPO) 8.1. RPO 8.2 promotes the management and enhancement of strategic land transport networks, including by travel demand management. In addition, RPO 8.3 requires future development is to be planned and designed in a manner that *inter alia* maximises the efficiency and protects the strategic capacity of the metropolitan area transport network both existing and planned, and further protects and maintains regional accessibility.

Having regard to official policy and in the interests of national road network maintenance and safety TII provides the following observations for the Board's consideration.



1.0 Official National Roads Policy

As noted above, 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 access to all turbine locations is facilitated via the local road network.

The proposed construction and turbine delivery haul routes indicate utilisation of the national road network.

TII as the national roads authority set guidance and standards for traffic and road assessments and construction that may be necessary by reason of proposed development location, scale or typology.

Elements of the national road network are operated and managed by a combination of (Public Private Partnerships) PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities in association with TII. Any crossing of the national road network, including by under or over pass will require prior consultation with TII and compliance with all relevant TII standards as detailed within the TII publications website www.tiipublications.ie.

2.0 National Road Network Maintenance and Safety

In addition to the above, there are a number of 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.

2.1 Proposed Turbine and Construction Haul Routes

Chapter 14 *Material Assets* of the submitted EIA includes *Traffic and Transport* at section 14.1. *Proposed Turbine Delivery Route* (TDR) is described at subsection 14.1.2.2 and *Proposed Construction Traffic Haul Route* at subsection 14.1.2.3. Both proposed traffic generation events include utilisation of the national road network.

Subsection 14.1.1.4 refers to EIA scoping response from TII. A Traffic Management Plan (TMP) is included as Appendix 14-2 of the EIA. Chapter 17 Mitigation and Monitoring of the EIA identifies the requirement to implement the TMP as part of *Pre-Construction* mitigation at Ref. no. MM98.

2.1.1 Proposed Turbine Haul Route

Proposed Turbine Delivery Route (TDR) at subsection 14.1.2.2 of the submitted EIA identifies that turbine components will be delivered into a sea port, yet to be identified. The turbine haul route is stated to access the site from the M3 motorway via Junction 6 (Dunshaughlin) with the R125 for onward transport of turbines across the local road network.

EIA Section 14.1.1.1 confirms that abnormal weight loads are not a feature of the turbine delivery vehicles, they are abnormal in size only 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 (Construction and Use of Vehicles) Regulations 2003 (S.I. No. 5 of 2003), as amended.

It remains the requirement that 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.

Subsection 14.1.7 *Route Assessment* of the submitted EIAR describes assessment of the turbine haul route from Junction 6 of the M3. Subsection 14.1.7.1 of the submitted EIAR identifies temporary widening works to the Junction 6 of the M3 to facilitate this route. Works are stated to include temporary removal of road signs.

2.1.2 Proposed Construction Haul Route

Proposed Construction Traffic Haul Route at subsection 14.1.2.3 of the submitted EIAR identifies part of the national road network for construction traffic: the M/N4 and N52.

2.2 National Road Network Maintenance and Safety

The national road network being traversed is managed by a combination of Public Private Partnership (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 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 maintained.
- Where temporary works within any MMaRC Contract Boundary are required to facilitate the transport of turbine components or construction traffic 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.
- Any proposed works to the national road network, including signage, 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 PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) Companies and local road authorities, as necessary, shall be in place.
- TII requests referral of all proposals agreed between the road authority, 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.
- Any damage caused to the pavement of the existing national road due to the turning movement of abnormal 'length' loads (e.g. 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.

3.0 Greenways

In relation to any Greenway proposals in the vicinity of the proposed works, consultation with Meath and Westmeath County Councils own internal project and/or design staff is recommended.

Conclusion

TII recommends resolution of the above matters in advance of any decision on the subject application.

Yours sincerely,



Cliona Ryan
Land Use Planner