

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

Date: 24 July 2023

**Re:** Construction of Dyrick Hill Windfarm comprising 12 no. wind turbines and related works.  
Townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemountain, Carrigaun (Mansfield) and others, Co. Waterford.

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.

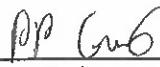
The Board will revert to you in due course in respect of this matter.

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](http://www.pleanala.ie).

If you have any queries in the meantime, please contact the undersigned officer of the Board or email [sids@pleanala.ie](mailto:sids@pleanala.ie) quoting the above mentioned An Bord Pleanála reference number in any correspondence with the Board.

Yours faithfully,

  
\_\_\_\_\_  
Ashling Doherty  
Executive Officer  
Direct Line: 01-8737160

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

by e.mail; sids@pleanala.ie

Dáta | Date  
21 July, 2023

Ár dTag | Our Ref.  
TII22-118216

Re. **Strategic Infrastructure Development – Construction of Dyrick Hill Wind Farm comprising 12 wind turbines and related works, Co. Waterford (ABP Case ref. PA93.317265)**

Dear Secretary,

TII has become aware of the above Strategic Infrastructure Development application on behalf of Dyrick Hill Wind Farm Limited. Although included in the list of consultees, TII has no record of formal receipt of the application. TII outlines 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).

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 regional road network in the first instance prior to access to the national road network.

#### 2. 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 prior to any decision on this planning application. In that regard, issues concern the proposed turbine component haul route to site and the grid connection to the Dungarvan 110kV Substation which both impact the strategic national road network.

##### 2.1 Proposed Turbine Haul Route

In relation to the proposed Turbine Component delivery to site, Section 2.5.4 of the EIAR outlines the Turbine Component Haul Route to site from the port of entry at Belview via the N29, N25 and N72, national roads. Section 14.3.1 of the EIAR confirms that detailed analysis of the proposed turbine haul route was undertaken and is set out in Appendix 14.1 (Abnormal Indivisible Load Route Review).

Próiseálann Blíé sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag [www.tii.ie](http://www.tii.ie).  
TII processes personal data in accordance with its Data Protection Notice available at [www.tii.ie](http://www.tii.ie).



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Appendix 14.1 outlines proposed temporary works impacting the national road network at the following locations;

- N29 Slieverue Roundabout
- N25 Luffany Roundabout
- N25 Carrick Road Roundabout
- N25/N72 Junction
- N72/R672 Junction
- N72/R672 Junction (Master McGraith Monument)

The national road network is managed by a combination of PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities. The section of national road being traversed which includes the N25 Slieverue Roundabout, the N25 Luffany Roundabout and the N25 Carrick Road Roundabout is within the N25 Waterford Bypass PPP Contract Area and is managed and operated by the PPP Concession (Celtic Roads Group (Waterford) Ltd.)

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.

Any proposed works to the national road network to facilitate turbine component delivery to site shall comply with TII Publications and shall be subject to Road Safety Audit as appropriate. Works should ensure the ongoing safety for all road users and prior to any development necessary licenses, approvals or agreements with 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 (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.

## **2.2 Abnormal Weight Loads**

While abnormal 'oversized' loads are addressed in the EIAR in the context of turbine component haul route proposals, no details appear to be included in the EIAR related to abnormal 'weight' loads.

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.

The Authority considers that it is critical a full assessment by the applicant/developer of all structures on the national road network along the haul route should be undertaken, where relevant, and all road authorities along the haul routes should confirm their acceptance of proposals by the applicant.

The Authority has reviewed the EIAR documentation referred and is concerned that no technical load assessment of structures appears to have been undertaken in support of this proposed application. However, it is acknowledged that abnormal weight loads may not be a feature of the proposed development.

The Authority considers that it is critical a full assessment by the applicant/developer of all structures on the national road network along the haul route should be undertaken, where relevant, to confirm that all structures can accommodate the proposed loading associated with the delivery of turbine and substation components to site where the weight of the delivery vehicle and load exceeds that permissible under the Road Traffic Regulations.

The Authority requests referral of all proposals agreed between the road authorities and the applicant impacting on national roads.

### **2.3 Grid Connection Routing**

Section 2.2 of the EIAR outlines that the proposed development also includes proposals for the connection of the wind farm to the national electricity grid via a 110 kV underground cable connection approximately 16km in length to the existing Dungarvan 110 kV Substation; approx. 1.2km of the grid connection routing is proposed within the N72, national road.

Drawing Sheet No. 05829-DR-101 outlines the extent of works to the section of N72, national road, impacted, including the grid connection routing, Joint Bays 1 and 2 and a HDD crossing of the River Colligan in the vicinity of Kildangan Bridge which is a national road structure (TII Structure ID: WC-N72-007.00). TII has not agreed nor consented to any works in the national road.

The works outlined have the potential to significantly impact the levels of safety and strategic function of the national road network in this area. The Board will also note that this issue was brought to the attention of the application team in the course of EIAR Scoping and TII advised that alternatives to grid connection routing in the national road should be identified.

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

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.

Proposals to lay cable in the national road reservation, including the construction of associated joint bays, such as that outlined in the subject application, have the potential to impact road authorities and TII in undertaking future maintenance and improvement requirements. 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.

In addition to the foregoing, it does not appear that the impact on traffic flows, delays, etc. of necessary traffic management measures to facilitate construction in the N72, national road, has been considered in any detail in the EIAR.

None of the above concerns appear to have been factored into the applicants consideration of the proposed cable routing which is proposed to utilise the strategic national road network.

TII is also concerned with what appears to be a significant lack of co-ordination in grid connection proposals in the vicinity. TII is aware of a permission, notwithstanding the recommendations of TII on the relevant application, for grid connection routing along this section of N72, national road, granted under ABP Case Ref. PL93.311670

following an appeal against the decision of Waterford City and County Council to initially refuse the application under ref. 21/735 (Sunrise Energy Supply Limited).

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 the Proposed Grid Connection Cable Routing fails to address important policy considerations impacting national roads.

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 and recommends that an alternative grid connection proposal is prepared.

In addition to the foregoing, TII notes proposals for grid connection routing by HDD crossing in the vicinity of Kildangan Bridge which is a TII Structure (Structure ID: WC-N72-007.00) and TII has not confirmed any acceptance for the proposals related to TII Structures included in the subject application.

There are Technical Acceptance requirements relating to modification or works impacting TII Structures and insufficient information has been provided in the subject application to demonstrate that the proposed works can be accommodated in the manner proposed. TII recommends identification of an alternative grid connection routing avoiding impact to national roads and associated structures in the interests of safeguarding the investment in and levels of safety on the strategic national road network in accordance with the provisions of official policy.

#### **2.4 Greenways**

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

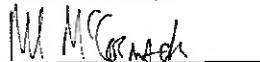
#### **2.5 TII Publications**

TII notes reference to the NRA DMRB (Design Manual for Roads and Bridges) in Section 14.2.2 Table 14.1 of the EIAR and advises that the NRA DMRB has been superseded by TII Publications ([www.tiipublications.ie](http://www.tiipublications.ie)) which contains all relevant standards relating to national roads.

#### **Conclusion**

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

Yours sincerely,



**Michael McCormack**  
Senior Land Use Planner