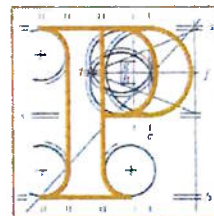


**Our Case Number:** ABP-318704-23



An  
Bord  
Pleanála

Transport Infrastructure Ireland  
Michael McCormack  
Parkgate Business Centre  
Parkgate Street  
Dublin 8  
D08 DK10

**Date:** 22 February 2024

**Re:** 10 year development of 9 Wind Turbines and associated infrastructure  
at Borrisbeg and adjacent townlands, near Templemore town in Co. Tipperary  
(<https://borrisbegplanning.com>)

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. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

*PP HCM*

Lauren Murphy  
Executive Officer  
Direct Line: 01-8737275

PA09

Tel	Tel	(01) 858 8100
Glaos Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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

## **Lauren Murphy**

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**From:** Landuse Planning <LandUsePlanning@tii.ie>  
**Sent:** Thursday, February 15, 2024 11:32 AM  
**To:** SIDS  
**Subject:** ABP Case ref. PA92.318704 (Buirios Limited)  
**Attachments:** ABP Case ref. PA92.318704.pdf  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged  
  
**Categories:** Lauren

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**TII ref. TII23-125698**

Dear Sir/Madam,

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

Yours sincerely,  
Mihcael 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.

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 iúl do [postmaster@tii.ie](mailto:postmaster@tii.ie), le do thoil, agus scríos an ríomhphost bunaidh agus aon cheangaltáin.



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

by e.mail; sids@pleanala.ie

Dáta | Date  
15 February, 2024

Ár dTag | Our Ref.  
TII23-125698

**Re. Strategic Infrastructure Development – 10 year development of 9 Wind Turbines and associated infrastructure at Borrisbeg and adjacent townlands, near Templemore town in Co. Tipperary**

**ABP Case ref. PA92.318704**

Dear Secretary,

The Authority acknowledges receipt of referral of the above Strategic Infrastructure Development application on behalf of Buirios Limited 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).

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, it is noted that the subject application description included in Section 4.1 of the EIAR includes reference to junction accommodation works and a new temporary access road off the L3248 to facilitate turbine delivery to the site. The location of the proposed temporary access to facilitate access for abnormally sized loads is detailed on, among other drawings, drawing no. 220310-04 and drawing number 220310 – 37.

Notwithstanding the development description included in Section 4.1 of the EIAR describing junction accommodation works and a new temporary access road off the L3248, to facilitate turbine delivery to the site, it appears from a review of the application and accompanying drawings that the temporary access is proposed at the junction of the N62/L3248. It is unclear that the proposal does not represent a new access, although temporary in nature, to the N62, national road, and as such, has the potential to directly conflict with the foregoing provisions of official policy.

Having regard to the foregoing, TII respectfully requests that the Board consider the access proposals to the N62 national road junction in the context of the provisions of official policy to ensure road safety for all road users and adherence to the provisions of official policy.

Próiseálann BIE sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag [www.tii.ie](http://www.tii.ie)  
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Bonneagar Iompair Éireann  
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In addition to the foregoing, based on the information provided in the subject application, it does not appear that the proposed temporary access for abnormally sized loads proposed at the junction of the N62/L3248 adheres to design standards included in TII Publications.

The Board will be aware that TII has a range of specific functions under The Roads Act 1993 (as amended) to support the general function of providing a safe and efficient national road network. Specifically relevant to the consideration of the proposed temporary access for abnormally sized loads proposed at the junction of the N62/L3248 in the subject application, Section 19(1)(e) provides the authority to TII to specify standards in relation to design, construction or maintenance works to be complied with by a person, road authority or public authority carrying out works to a national road. Such standards are set out in the suite of technical design standards collectively referenced as TII Publications ([www.tiipublications.ie](http://www.tiipublications.ie)).

Design Standards addressing '*Geometric Design of Junctions (priority junctions, direct accesses, roundabouts, grade separated and compact grade separated junctions)*' are set out in TII Publications DN-GEO-03060. Although it is noted that Section 15.2.1.4 of the EIAR makes reference to TII Publications DN-GEO-03060 Design Standard, the proposed temporary access for abnormally sized loads proposed at the junction of the N62/L3248 does not appear to conform to the design standards set out in TII Publications DN-GEO-03060 and may represent a departure from standard.

In addition, TII Publications provisions include the requirement that a '*Design Report*' in accordance with TII Publication DN-GEO-03030 (Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes) is submitted for any works impacting a national road. The purpose of the Design Report is to address and present issues relating to compliance with the relevant parts of TII Publications (Standards). Applying the relevant standards will safeguard road user safety.

TII has no record of a '*Design Report*' being prepared or submitted in relation to the proposed temporary access for abnormally sized loads proposed at the junction of the N62/L3248 and this is considered a significant oversight having regard to the nature of the development proposed and TII considers that this issue requires resolution to ensure safe and appropriate access is provided that safeguards the safety of all road users on the national road.

In summary, TII respectfully requests that the Board consider the access proposals to the N62 national road junction in the context of the provisions of the Section 28 Ministerial Guidelines '*Spatial Planning and National Roads Guidelines for Planning Authorities*' (DoECLG, 2012). TII is further of the opinion that the design proposed for the proposed temporary access for abnormally sized loads proposed at the junction of the N62/L3248 does not adhere to TII Publications Design Standards and TII has no record of the submission of a Design Report as required by TII Publication DN-GEO-03030 (Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes).

TII considers that the above issues require resolution in advance of any decision on the subject application in the interests of ensuring road safety for all road users and adherence to the provisions of official policy.

## **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:

### **2.1 Proposed Turbine Haul Route**

Section 4.5.2 of the EIAR confirms a turbine component haul route from the port of entry at Dublin Port to the Borrisbeg Windfarm site. Section 15.2.9 of the EIAR outlines the Abnormal Load Route Assessment to site utilising the M50, N7/M7 and N62 national roads.

The proposed haul route passes through a number of counties, the applicant/developer should therefore consult with all County Councils. In addition, the national road network is managed by a combination of PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) as well as the local road authorities. The applicant/developer should consult with all PPP Companies, MMaRC Contractors as well as the road authorities over which the haul routes traverse to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is maintained.

Notwithstanding comments outlined above in relation to the proposed temporary access adjacent the N62/L3248 Junction, any other 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, permits or agreements with PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) Companies and local road authorities, as necessary, shall be in place.

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.

TII requests referral of all proposals agreed between the road authority, PPP Concessions and MMaRC Companies and the applicant impacting on national roads. Where temporary works within any MMaRC Contract Boundary are required to facilitate the transport of any abnormal loads to site, the applicant/developer shall contact [thirdpartyworks@tii.ie](mailto:thirdpartyworks@tii.ie) in advance, as a works specific Deed of Indemnity will be needed by TII before the works can take place.

## **2.2 Structures on Haul Route**

While the above referenced sections of the EIAR address abnormal sized loads, it is unclear if the proposed windfarm or ancillary related development, such as the substation, feature any abnormal 'weight' loads. Therefore, in the interests of clarification, 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.

With specific reference to national road structures on the proposed haul route, all structures should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal loads proposed. In such circumstances, the Authority is of the opinion that an assessment review (by the applicant/developer), where relevant, of all national road structures concerned is required to confirm that all the structures can accommodate the proposed loading associated with the delivery of wind turbine and substation and grid connection components where the weight of the delivery vehicle and load exceeds that permissible under the Road Traffic Regulations. The road authority along the haul route should confirm acceptance of proposals by the applicant.

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

## **2.3 Grid Connection Routing**

It is noted that there are no material impacts to the national road network relating to grid connection proposals included in the application.

## **2.4 Greenways**

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

## **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