

Sinead White

From: Landuse Planning <LandUsePlanning@tii.ie>
Sent: Monday 5 January 2026 10:52
To: SIDS
Subject: ACP Case ref. PA07.319307 (Laurclavagh Limited)
Attachments: ACP Case ref. PA07.319307 - FI Response.pdf
Categories: Sinead White

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TII ref. TII24-126615

Dear Sir / Madam,

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

Yours sincerely,
Michael McCormack
Senior Land Use Planner

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

by e.mail; sids@pleanala.ie

Dáta | Date

5 January 2026

Ár dTag | Our Ref.

TII24-126615

Bhur dTag | Your Ref.

Re: Strategic Infrastructure Development – Further Information Submitted in relation to Proposed no. 8 wind turbines and associated works at Laurclavagh and adjacent townlands, Co. Galway

ACP Case ref. PA07.319307

Dear Sir / Madam,

The Authority acknowledges receipt of referral of Further Information in relation to the above Strategic Infrastructure Development application on behalf of Laurclavagh Limited and provides the following observations for the Commissions 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 Commission 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.

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.

Section 2.6 of the DoECLG Guidelines provides that notwithstanding the provisions of Section 2.5, above, that planning authorities may apply a less restrictive approach to the management of access to a national road in 'exceptional circumstances' but only as part of the process of reviewing or varying the relevant development plan.



In relation to the subject application, it is noted that access is generally provided to the N83, national road, via the L61461 local road, however, access requirements include proposals to construct a temporary access track at the N83, national road, to L61461, local road, to be used for the delivery of oversize turbine components to site. TII's records indicate that a 100kph speed limit applies to the section of N83, national road, concerned.

TII advises that the current Galway County Development Plan has not provided any agreed 'exceptional circumstances' cases for development accessing a national road such as the temporary access proposed in this subject Strategic Infrastructure Development application.

The documentation submitted in support of the proposed development (drawing no. 210627 - 34) outlines that the access track and temporary roadside fencing will be removed following the commissioning of the wind farm and lands and roadside boundaries will be reinstated.

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.

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. To give effect to such requirements, TII outlines the following matters for the Commission's consideration in the assessment of the subject proposal concerning the temporary access to the N83, national road, and the following conditions should apply if the Commission are mindful to grant permission;

- The proposed temporary access is for a temporary period only to facilitate turbine component delivery and the temporary access to the N83 shall thereafter be closed and lands reinstated. TII considers that this access arrangement should be closed following completion of the construction phase of development in the interests of road safety and adherence to the provisions of official policy.
- The temporary access to the N83, national road, should be closed off with a temporary safety barrier when not in use for turbine component delivery, as it could be misinterpreted by drivers as part of the roadway. Pending completion of construction, the temporary access shall thereafter be permanently closed and the lands and roadside boundaries reinstated.
- Any damage caused to the pavement on the existing national road at the temporary access from the N83, national road, due to the turning movement of abnormal 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.
- Road user safety on the national road shall be safeguarded and recommendations of the Road Safety Audit shall be incorporated into final designs for construction and the requirements to implement the recommendations of the Road Safety Audit included as a condition on any permission granted.
- In the interests of road user safety, all works to the national road shall comply with TII Publications (formerly NRA DMRB); technical design standards for national roads.
- Temporary Traffic Management; the temporary access must be managed as roadworks for the entire duration of their opening and remain under approved traffic management measures which shall be agreed prior to the commencement of development with the road authority.

As outlined above, Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines provides that planning authorities may apply a less restrictive approach to the management of access to a national road in 'exceptional circumstances' but only as part of the process of reviewing or varying the relevant development plan. The current Galway County Development Plan has not provided any agreed 'exceptional circumstances' cases for development accessing a national road such as that proposed in this Strategic Infrastructure Development application.

TII also notes discussion in the Further Information related to the existing junction of the L61461 local road / N83 national road and discussion on the updated road line markings.

The applicant outlines that the initial lining arrangement that pertained at the time the subject application was first submitted had the stop line located adjacent to the carriageway edge and this provided for full 3m x 215m visibility splays. Reference is made to TII Publications DN-GEO-03060 in that regard.

It is further outlined that the current configuration of the road markings on the L61461 approach to the N83, which is in place at present (August 2025), sets the stop line at the nearside edge of the hard shoulder and has been implemented without any alterations to the boundary walls running parallel to the N83, and as a result, there are significant restrictions to the visibility splays for drivers accessing the N83 from the L61461.

In relation to this matter, it should be noted that the visibility splay / sightlines do not change when you move a stop line. Clause 5.6.2.2 of TII Publications DN-GEO-03060 (Geometric Design of Junctions) requires that the x-distance is measured from the nearside edge of the paved surface (including hard strip or hard shoulder), often referred to as the metalled edge of the road, irrespective of where any stop line may be lined. As such there has been no change to the visibility at this junction. The stop line has been moved and re-lined in accordance with the TII Standard and the Traffic Signs Manual.

Having regard to the foregoing, TII advises that it is critical that where increased traffic from the L61461 local road accesses the N83, national road, arises as a result of the proposed development that sufficient visibility is provided at the local road access to the N83, in the interests of the safety of all road users, and that appropriate mitigation or management of the operation of the junction is provided to the satisfaction of Galway County Council as road authority. TII recommends resolution of this matter prior to any decision on the subject application.

2. National Road Network Maintenance and Safety

In addition to the above, as outlined in TII's initial submission on this application, 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 Component Haul Route

Haul Route proposals for wind turbine component delivery to site are outlined in Section 15.1.2.2; originating from the port of entry at Galway to site via the N83, national road.

In the first instance, the national road network is managed by a combination of 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 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.

TII requests referral of all proposals agreed between the road authorities, 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. 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 in advance, as a works specific Deed of Indemnity will be needed by TII before the works can take place.

In the interests of clarification, 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 the local road authorities shall be in place.

All national road and ancillary overground/underground assets shall be subject to proper undamaged reinstatement and properly certified to the relevant standards in accordance with the assets' functions together with any working widths/depths which they require.

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 Structures

Haul Route proposals for wind turbine component delivery to site are outlined in Section 15.1.2.2 and Section 15.1.9 details the Abnormal Load Route Assessment.

While the assessments undertaken detail the impacts of abnormal 'length' loads, it is unclear from the documentation submitted with the application if all structures on the haul route have been assessed to facilitate any abnormal 'weight' loads.

TII acknowledges that Table 15-1 of the EIAR confirms that although it is proposed that the delivery stage of the Proposed Project will involve abnormally large loads, the axle loadings will not exceed accepted limits. Notwithstanding, 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 that all the structures can accommodate the proposed loading associated with the delivery of turbine and/or substation components where the weight of the delivery vehicle and load exceeds that permissible under the Road Traffic Regulations.

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.

While an abnormal load is defined as anything above 46 tonnes and below 180 tonnes, any load above 180 tonnes, represents an 'Exceptional Abnormal Load' ('EAL'). All structures to be crossed will need a full structural assessment by the developer in accordance with TII Publications AM-STR-06048 to verify that they can sustain any 'EAL' load safely and without any damage. Reference should be made to Department of Transport Circular RW18 of 2024 ('Exceptional Abnormal Loads') in that regard.

Full details of the transportation of all Abnormal Loads and all 'Exceptional Abnormal Loads' associated with the subject development shall be agreed with all planning and road authorities along all proposed haul routes prior to the commencement of any development.

2.3 Cabling/Trenching

Section 1.10 of Table 1 of the Applicants Further Information Response outlines the Commissions request for further information related to grid connection proposals as follows;

'TII outline the proposals to lay the grid cable in the N83 national road reservation has a potential to impact on road authorities and TII in undertaking future maintenance and improvement requirements, and there also may be additional cost implications to improvements and maintenance resulting from the presence of high voltage cabling. Please outline if joint bays can be accommodated within the N83 carriageway, and their locations should be clearly outlined'.

While the above extract from Table 1 of the Further Information Response appears to be an accurate reflection of the Commissions Further Information request, it does not accurately reflect TII's position in relation to grid connection proposals as outlined in TII's initial submission on the proposed development. On the contrary, TII's submission sought clarification on whether joint bays could be accommodated 'off' the N83 carriageway.

Having regard to this matter, TII advises that the Authority's submission in relation to grid connection proposals remain as set out in TII's submission on the initial application. It is further noted, that Section 2.1 of the EIAR confirms that the proposed grid connection, including the 110kV substation and supporting infrastructure, will be subject to a separate Section 182A application, so these matters may be subject to resolution in a subsequent application where TII expects that the following matters can be addressed, in the interests of safeguarding the strategic function of the national road network in the area.

EIAR Section 15.1.7 considers the 'Effect on Network of Proposed Grid Connection Underground Cabling Route'. The grid connection cable routing includes a 7.5km section on the N83, national road, and the EIAR states that this section of carriageway has sufficient width for the construction of the underground cabling to take place while operating a "stop-go" arrangement in order to retain two-way traffic flow. It also confirms that the section of the grid connection in the N83, national road, will take approximately 50 days to construct.

EIAR Appendix 4-8 'Grid Connection Infrastructure' details that 11 no. joint bays are proposed in the N83, national road, and one HDD Crossing of the M18 is proposed.

Section 4.7.2.8 of the EIAR states that the precise siting of all Joint Bays, Earth Sheath Link Chambers and Communication Chambers within the planning corridor assessed is subject to approval by ESNB and Eirgrid. However, the drawing notes included on the standard detail drawings, for example Fig. 4-14 and Fig. 4-18, advise that the exact location of cable/joint bay in the road curtilage will be subject to ESB/EirGrid specifications and agreement with Galway County Council.

TII considers that the agreement with the relevant road authority is a necessary requirement having regard to the potential significant negative impact on the strategic national road network arising from the installation of joint bays, the extent of cabling proposed and the limited level of detail in relation to joint bay location included in the subject application.

The works outlined have the potential to significantly impact the levels of safety and strategic function of the national road network in this area.

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.

Furthermore, Section 15.1.7 of the EIAR outlines that for the 7.5km section of the grid connection cable route which travels along the N83 it is estimated that the construction will take approximately 50 days. During the construction of this section two-way traffic flow on the N83 will be maintained by means of a "Stop -Go" traffic management arrangement.

It does not appear that the impact on traffic flows of this traffic management arrangement has been considered in any detail and this is a serious concern given the high AADT on this road link and the potential availability of alternative routes or technological solutions.

Section 12.4.1.1 'Accelerate Renewable Electricity Generation' of the Climate Action Plan 2024 (CAP24) outlines the objective of reaching 80% of electricity demand from renewable sources by 2030 through a range of measures, including; 'All relevant public bodies will carry out their functions in a manner which supports the achievement of the renewable electricity targets, including, but not limited to, the use of road and rail infrastructure to provide a route for grid infrastructure where this is the optimal solution'.

Consistent with CAP24, for all renewable energy developments requiring grid connection to the national grid, TII recommends that a full assessment of all route alternatives for grid connection takes place, including alternatives to public road, where appropriate. In TII's experience, grid connection accommodated on national roads has the potential, inter alia, to result in technical road safety issues such as differential settlement due to backfilling trenches and can impact on ability and cost of general maintenance, upgrades and safety works to existing national roads.

Having regard to the measures identified in CAP24 and the insufficient information in relation to the impact of grid routing for 7.5km along the N83, national road, included in the subject application, for example, in relation to the impact of required traffic management on N83 traffic flows for 50 days during construction or whether joint bays can be accommodated off the N83 carriageway, TII is unclear that the routing proposed represents the optimal routing solution. In the event that An Coimisiún Pleanála determines that the N83 cable routing represents the optimal solution, following a full assessment of alternatives, TII requests that a condition of

planning permission would include for the removal of joint bays from the paved national road surface.

TII also refers the Commission to Department of Transport Circular RW 07 of 2025 and the 'Interim Guidance to Road Authorities (placement of Medium or High Voltage electricity assets)' which can be accessed at; <https://www.gov.ie/en/publication/ece06-electricity-transmission-infrastructure-development-roads-sector-engagement-framework-interim-guidance/>.

The 'Interim Guidance' which, as outlined in the Circular, are issued pro tem until the development of any procedures for the planning, regulation, construction and management of Medium or High Voltage cables under public roads by the 'HV Forum' and the conclusion of any outcomes from the Private Wires Consultation undertaken by the Department of Energy, Climate and Communications.

Section 4.10 of the EIAR submitted indicates that upon decommissioning the Proposed Grid Connection underground cabling route and onsite 110kV substation will remain in place as it will be under the ownership and control of the ESB and Eirgrid and as the proposed grid connection is 110kV, TII also considers that the 'Electricity Transmission Infrastructure Development – Roads Sector Engagement Framework' also included in Department of Transport Circular RW 07 of 2025 applies.

TII respectfully requests that the Commission assess the proposed grid routing to determine that the 'optimal solution' results.

Where an 'optimal solution' for grid routing impacts the national road network, the following principles apply;

- Any cable routing should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, embankments, drainage, structures, 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. The developer should also be aware that separate approvals may be required for works traversing the national road network.
- The Commission will also note that Section 5.5 of TII Publications DN-STR-03012 (Design for Durability) requires that electricity cables 10kV or greater shall not be located on or over road structures, including buried structures. Where electricity cables 10kV or greater are required to cross a road structure they shall pass below the structure, at a sufficient depth so as to remove the potential for any impacts on the structure during operation.

2.3.1 HDD and Water Crossings

Without prejudice to the foregoing, TII notes grid connection proposals include for a HDD crossing off the M18 at Killeelaun td., south of Tuam. As the M18 is designated Motorway at this location, consent for this crossing under Section 53 of the Roads Act is required.

In addition, other consents are required, for example, local authority consent, licencing or arrangements for third party access to the national road network, etc.

Contact should be made to 'thirdpartyworks@tii.ie' to progress proposals for the HDD motorway crossing and consultation, as required, should also take place with relevant PPP Companies and MMaRC Contractors as well as the local road authorities.

In relation to other crossings proposed in the grid connection routing, Table 4-4 in Section 4.7.2.9 of the EIAR identifies WC1 and WC2 as two proposed water crossings, on and in the vicinity of the N83, national road, and associated TII Structures.

WC1 is proposed to cross at TII Structure ID GC-N17-007.00 (Claretuam Bridge) by way of a proposed Standard Trefoil Formation (Option A). Although the EIAR states there is sufficient separation distance to accommodate the standard trefoil formation cable arrangement crossing over the watercourse without any amendment to the trench or ducting profile, TII considers insufficient information has been provided in this regard.

In the context of climate adaptation and national road network resilience, the proposed option of crossing the TII Structure by Standard Trefoil Formation will potentially limit remedial or enhancement works at this location.

TII recommends that any existing freeboard should be preserved to allow for increasing the size of the existing modest drainage culverts to provide additional capacity and accommodate additional water flows as required. In such circumstances, TII considers that a HDD crossing (Option D) of WC1 should be deployed as opposed to Standard Trefoil Formation (Option A).

WC2 is a proposed HDD Crossing in the vicinity of TII Structure ID GC-N17-006.00 (Cloonmore Bridge).

Where the Commission is satisfied that the proposed HV routing utilising the national road corridor is the optimal solution following full assessment of alternatives, TII requests as a condition of any permission granted, in relation to national road structures, that all crossings are by HDD and, in addition, that full proposals from the applicant shall be submitted to the road authority for TII Structures Section approval, confirming the proposed location of all services and the construction methodology in the vicinity of all national road structures. No works should commence in the vicinity of any national road structure pending agreement from the road authority in consultation with TII Structures Section.

2.4 Greenways

In relation to any Greenway proposals in the vicinity of the proposed works, consultation with Galway 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 faithfully,



Michael McCormack
Senior Land Use Planner