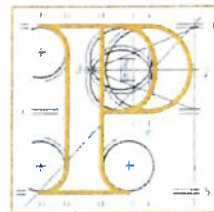


Our Case Number: ABP-319448-24

Planning Authority Reference Number: S254W/08/23



An
Bord
Pleanála

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

Date: 29 May 2024

Re: Section 254 Licence: Streetpole solution to address identified mobile and wireless broadband coverage.
Public grass verge along Carpenterstown Avenue, Carpenterstown, Castleknock, Dublin 15
(E:707594 N: 737428 ITM)

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,


Raymond Muwaniri
Executive Officer
Direct Line: 01-8737125

PA09

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64 Marlborough Street
Dublin 1
D01 V902



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

by e.mail; sids@pleanala.ie

Dáta | Date
22 May, 2024

Ár dTag | Our Ref.
TII24-126772

Re. Strategic Infrastructure Development – Proposed Development of an 8 no turbine wind farm development and associated works on land within the townlands of Clonmellon, Kilrush Upper, Kilrush Lower, Newtown, Ballinlig, Carnybrogan, Cavestown and Rosmead, County Westmeath and Galboystown, Co. Meath

ABP Case ref. PA17.319448

Dear Secretary,

The Authority acknowledges receipt of referral of the above Strategic Infrastructure Development application on behalf of Knockanarragh Wind Farm 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

1.1 National Road Access

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.

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 the Section 2.9 of the EIAR identifies the inclusion of a new site entrance to T8 from the N52, national road, via an existing agricultural access within the townlands of Cavestown and Rosmead. The proposed access is detailed on EIAR Figure 14-4 as ‘Site Entrance 3’.

TII’s records indicate that an 80kph speed limit applies to the section of N52, national road, concerned.

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag www.tii.ie.
TII processes personal data in accordance with its Data Protection Notice available at www.tii.ie.



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The current Westmeath County Development Plan has not provided any agreed 'exceptional circumstances' cases for development accessing a national road such as that proposed in this subject Strategic Infrastructure Development application.

The EIAR does not appear to address the obvious policy conflict arising from the proposed access direct to the N52, national road, at an 80kph speed limit location and this issue is not reflected in the summary of TII's EIAR Scoping submission (EIAR Table 14-1) which identified the need to address this issue in any application.

In addition to the foregoing, TII has no record that a Design Report has been submitted in relation to the proposed alterations to the N52 comprising the formation of a direct private access. TII Acceptance of a Design Report for such works to a national road is required as set out in TII Publication GN-GEO-03030 (www.tiipublications.ie).

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.

TII considers that this identified policy conflict requires resolution prior to any decision on the subject application having regard to the aforementioned provisions of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

Without prejudice to the foregoing, if the Board is of the opinion that the conflict with policy on access to national roads can be resolved, TII outlines the following road safety matters for the Boards consideration which would also require assessment in the context of the subject proposals access requirements to the N52, national road, including proposed access from the local road network to the N52, prior to any decision being made on the planning application;

- TII is not aware of any Road Safety Audit being completed for the development access to the N52, national road. It is critical that road user safety on the national road shall be safeguarded. TII recommends that a Road Safety Audit should be undertaken, and all 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.
- The developer shall submit revised documentation which shall demonstrate that all works to the national road shall comply with TII Publications (formerly NRA DMRB); technical design standards for national roads, including Design Report requirements in accordance with TII Publications GN-GEO-03030.
- TII also advises that any damage caused to the pavement on the existing 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.

1.2 National Road Scheme Planning

TII notes the subject development proposal, including the cable routing and proposed access to the N52, national road, are located within the confirmed Constraints Study Area for the N52 Improvement Scheme 'N52 Cavestown to Kilrush'.

In accordance with the provisions of Section 2.9 of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012), national road schemes should be safeguarded from development that could prejudice or compromise scheme design and delivery. In addition, in accordance with 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, including planning for future capacity enhancements.

While the EIAR notes that consultation has taken place with Westmeath County Council (National Road Design Office) in relation to the proposed national road scheme, the EIAR is unclear as to how this issue has been considered and addressed in the application in terms of adhering to official policy as outlined in Section 2.9 of the DoECLG Guidelines (2012).

TII considers that clarification in this regard is required and the Strategic Infrastructure Development application should proceed only where it is demonstrated that Section 2.9 of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) has been adhered to.

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

Haul Route proposals for wind turbine component delivery to site are outlined in Section 2.94 and Section 14.60 of the EIAR and Appendix 14-1 includes the Turbine Delivery Route Works Report. Turbine component delivery routing is from port of entry at Dublin to site via the M50, M4, N4 and N52, national roads.

The Turbine Delivery Route Works Report outlines works required to the national road network, N4/N52 junction and the N52 national road to facilitate turbine component delivery to site.

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. 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 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.

In addition, the national road network being traversed 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 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.

Where temporary works within any MMaRC Contract Boundary are required to facilitate the transport of turbine components 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.

2.2 Structures

While the assessments undertaken in relation to turbine component delivery route to site details 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.

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 to site 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.

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

2.3 Cabling/Trenching

EIAR Section 2.70 and Section 14.63 detail the proposed cable routing which forms part of this Strategic Infrastructure Development application. The grid connection cable routing includes approx. 2.5km section on the N52, national road, and the EIAR states that grid connection will be undertaken with single lane closure on the N52, national road (EIAR Section 2.74), and works are anticipated to take 26 weeks.

Associated drawings indicate the construction of three no. joint bays in the N52, national road, corridor and one no. water crossing.

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

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.

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.

The grid connection cable routing includes approx. 2.5km section on the N52, national road, and the EIAR states that grid connection will be undertaken with the aid of lane closure on the (EIAR Section 14.64), and works are anticipated to take 26 weeks.

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, TII considers that insufficient information in relation to the impact of grid routing along the N52, national road has been included in the subject application. TII would highlight, for example, in relation to the impact of required traffic management on N52 traffic flows for a potentially significant number of days during construction or whether joint bays can be accommodated off the N52 carriageway.

TII is also of the opinion that the developer has not provided evidence to demonstrate that the routing proposed represents the optimal routing solution especially in relation to technical road safety issues such as differential settlement due to backfilling trenches, impact on ability and cost of general maintenance, upgrades and safety works to existing national roads on this important national road route, etc.

Taking account of the matters outlined, in the event that An Bord Pleanála determines that the N52 cable routing represents the optimal solution, following a full assessment of alternatives and associated implications, TII requests that a condition of planning permission would include for the removal of joint bays from the paved national road surface.

2.3.1 HDD and Water Crossings

Without prejudice to the foregoing, TII notes grid connection proposals include for a number of water course crossings. Drawing Number ABP-314271-22-MWP- 016 indicates one crossing of a watercourse which passes under the N52, national road. Section 7.68 of the EIAR details methods to be applied for watercourse crossings. Exact details for the proposed crossing of the watercourse along the proposed cable route on the N52, national road, is not provided.

In the context of climate adaptation and national road network resilience, TII recommends that any existing freeboard should be preserved to allow for increasing the size of the existing watercourse drainage culverts to provide additional capacity and accommodate additional water flows as required. In such circumstances, TII considers that a HDD crossing of the watercourse under the N52, national road, should be deployed

Where the Board is satisfied that the proposed HV routing utilising the national road corridor is the optimal solution following a full assessment of alternatives and associated implications, TII requests as a condition of any permission granted, in relation to national road structures, that all crossings on the national road 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 and the requirements of TII publications.

2.4 Greenways

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

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

Michael McCormack
Senior Land Use Planner