

The Secretary  
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Dáta | Date  
11 July, 2024

Ár dTag | Our Ref.  
TII24-127595

**Re. Strategic Infrastructure Development – Proposed Windfarm Repowering at the existing Kilgarvan Wind Farm, Inchincoosh, Inchee, Lettercannon, Coomacullen and Cloonkeen, Co.Kerry**

**ABP Case ref. PA08.319741**

Dear Secretary,

The Authority acknowledges receipt of referral of the above Strategic Infrastructure Development application on behalf of Ørsted Onshore Ireland Midco 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). 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 15.1.2.1 of the EIAR advises that windfarm access will utilise the existing site access junction which is located on the southern side of the N22 at a point approximately 26 kms west of Macroom and 22 kms southeast of Killarney in County Kerry.

TII’s records indicate that a 100kph speed limit applies to the section of N22, national road, concerned.

The current Kerry 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.

Próiseálann BIÉ 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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The EIAR does not appear to address the obvious policy conflict arising from the proposed access direct to the N22, national road, at a 100kph speed limit location.

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 N22, national road, prior to any decision being made on the planning application;

- TII notes that Section 15.1.9 of the EIAR advises that no Road Safety Audit has been undertaken for the N22 access junction as no change to the junction is proposed. Notwithstanding, TII considers that use of a private access to the N22, in the manner proposed, at a location where a 100kph speed limit applies should be supported and evidenced by a safety review to ensure no road safety issues arise and any mitigations or improvements identified can be incorporated into any permission granted in the interests of road user safety. A considerable period of time has passed since the junction was initially designed and other changes to the road network may also have occurred that support the requirement for a safety review of the junction in addition to changes to the scale of the turbines delivered to the site.
- Any recommendations of the road safety review shall be incorporated into final designs for construction and the requirements to implement the recommendations of the road safety review shall be included as a condition of any permission granted.
- 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.

## **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 15.1.2.2; originating from the port of entry at Cork to site via the N28, N40 and N22, national roads.

The applicant/developer should consult with all 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.

TII notes that Section 15.1.8 of the EIAR identifies proposed works to the national road network to facilitate turbine component delivery to site. 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.

TII requests referral of all proposals agreed between the road authorities 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 Authorities prior to the commencement of any development on site.

In addition to the foregoing, TII notes the EIAR identifies two options for turbine component delivery to site, one directly from port of entry at Ringaskiddy to site and another option that involves transferring the turbine components from the blade trailer to a blade adapter in order to transport the blade from the site entrance to their intended set down area within the site; Section 15.1.2.2 of the EIAR refers. This latter option involves 'abnormal load' delivery vehicles performing a reversing manoeuvre on the N22, national road, onto a local road to effect the blade transfer between vehicles. TII is concerned that such an approach does not appear to have been subject to any road safety analysis or review as highlighted in item no. 1, above. TII considers that this needs to be addressed.

## **2.2 Structures**

Haul Route proposals for wind turbine component delivery to site are outlined in Section 15.1.2.2 and Section 15.1.8 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. Though TII acknowledges that Table 15-1 of the EIAR confirms that the axle loadings will not exceed accepted limits.

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( i.e. not just Kerry) 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**

TII notes proposals to utilise existing grid connections and that there are no new grid connection proposals included in the subject application with the potential to impact the strategic national road network.

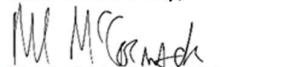
## **2.4 Greenways**

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