
Marine Development – Application - North Irish Sea Array ("NISA") Offshore Wind Farm (www.northirishsearraysid.ie) ABP ref no: OA29N.319866

From Landuse Planning <LandUsePlanning@tii.ie>

Date Tue 10/20/2026 2:39 PM

To Marine <marine@pleanala.ie>

 1 attachment (1 MB)

TII24-128371 Proposed development known as North Irish Sea Array November 2026.pdf;

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To whom it may concern,

I attach TII's observation related to Marine Development North Irish Sea Array ("NISA") Offshore Wind Farm ABP ref no: OA29N.319866.
TII would appreciate an acknowledgement of receipt.

Regards

Tara Spain
Head of Land Use Planning .
Transport Infrastructure Ireland.
Email: LandUsePlanning@tii.ie



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The Secretary
An Coimisiún Pleanála
64 Marlborough St.
Dublin 1
D01 V902
by email: marine@pleanala.ie

Dáta | Date
16/10/2026

Ár dTag | Our Ref.
TII24-128371

**Re. Marine Development – Application - North Irish Sea Array ("NISA") Offshore Wind Farm
(www.northirishsearraysid.ie) ABP ref no: OA29N.319866**

Dear Secretary,

Transport Infrastructure Ireland (TII) acknowledges that it is not a prescribed body under Schedule 1 of the Planning and Development (Maritime Development) Regulations 2023 (S.I. No. 100 of 2023). For clarity, TII did make a submission to the initial planning application phase, and the applicant did seek to address that submission in its further information response. Transport Infrastructure Ireland (TII) received no referral of this additional information from the applicant. Despite this non-referral by applicant, Transport Infrastructure Ireland has sought out and reviewed the new material available on the applicants website.

The Commission is expected to be aware that appropriate design and management of proposals which interact with the motorway network are required to protect the physical integrity of the M1 in the interest of not only road safety and operations but also public safety in general. It is critical that appropriate technical assurance is demonstrated, evaluated and measures agreed. To illustrate the strategic importance of applying these technical assurances at the earliest stages, TII attaches as an appendix, the most recent traffic information from the Traffic Monitoring Units located on the M1 located between Junction 3 and 4 at Swords and Junction 4 and 5. This information is provided to remind decision makers, such as An Coimisiún Pleanála, of the importance of the scale of the operations and activity which these vital pieces of physical infrastructure support.

Following TII's evaluation of the material available online, we advise that there remains a number of technical requirements and operational issues related to the subject development proposal. These need to be addressed prior to the commencement of development through the application of appropriate condition. TII consider this is essential. The following elaborates:

A. Motorway Crossings: R132 (Blakes Cross to Lissenhall) and Cable Route M1 Flyover to Estuary Roundabout

As indicated, appropriate design and management of these proposed crossings are required to protect the physical and operational integrity of the M1 in the interest of not only road safety and operations but public safety in general. Therefore, it is critical that ensure that appropriate technical assurance is demonstrated, evaluated and measures agreed prior to the commencement of development. The appendix attached reminds An Coimisiún Pleanála, of the importance of the scale of the operations and activity on the M1 which these vital pieces of physical infrastructure support.

TII has already outlined in our earlier submission that the proposed HDD crossings of the M1 require consent under Section 53 of the Roads Act. Having reviewed the applicant's further information, TII is the opinion that existing and new matters are required to be addressed prior to the commencement of development as follows:

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- I. TII notes the applicant's response to our submission and the revised documentation associated with grid cable connection proposals with Motorway M1 crossings at Lissenhall. TII advises that TII Publication CC-PAV-04007 provides the technical standards for this crossing. Having reviewed the additional information documentation, TII highlights that the applicant has not indicated the typical arrangements which are expected for the proposed HDD crossing from Blakes Cross to Lissenhall.

TII notes with concern that the applicant has not sought to address with the multiple bores and their zones of influence and mitigation of deflections. TII advises that these matters are required to demonstrate that the physical integrity of the M1 can be protected and safeguarded. As previously advised, consent under Section 53 of the Roads Act 1993 (as amended) is required.

- II. TII having reviewed the new material available on the applicant's website, TII advises that the *Cable Route M1 Flyover to Estuary Roundabout* passes under the motorway will also require Section 53 consent.

Having regard to the foregoing and in the interests of adhering to the requirements of official policy concerning maintenance of the strategic capacity and safety of the national road network in the area. The Commission is reminded that Section 53 of the Roads Act 1993, controls works by on or affecting motorways, protected roads and busways. TII advise it is essential that any permission granted does not consent to any works within the motorway reservation and recommends the following condition:

Recommended Condition :

- This permission does not approve nor imply consent for any works within the M1, Motorway Reservations.

Reason; In the interests of clarity as to the construction of this permission and to safeguard the strategic function and maintain levels of safety on the national road motorway network in accordance with National Strategic Outcome no. 2 of the National Planning Framework, Departments of Housing, Local Government and Heritage, Spatial Planning and National Roads, Guidelines for Planning Authorities (2012) and TII Publications.

B. Cable Route M1 Flyover to Estuary Roundabout : Structures

Associated with item A above, TII observes grid cable connection proposals under M1 Broadmeadows Estuary Bridge (Flyover) and the new material available on the applicant's website. TII again refers to TII Publications: Design DN-STR-03012 Design for Durability [DN-STR-03012](#) and in particular the requirements outlined in Section 5.5 Services which states:

"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."

Given the importance of ensuring the resilience of the M1 Broadmeadows Bridge, the cables will be passing adjacent to an existing pier. TII consider it is essential that the developer shall be required to demonstrate and ensure that the proposed trench required does not encroach on the zone of influence of the foundations supporting the M1 Broadmeadows Estuary Bridge during and after construction. TII therefore considers that the applicant remains required to submit to the satisfaction and agreement of TII Structures Section an appropriate technical report prior to commencement of any development.

It would be expected that the Commission would be cautious in ensuring appropriate protection of the M1 Broadmeadows Bridge and not provide consent to any works which may undermine this bridge structure. TII recommends the following condition be applied:

Recommended Condition:

- Prior to commencement of development, the developer shall submit to the satisfaction and agreement of TII Structures the appropriate technical report(s) in accordance with the requirements of TII Publications to demonstrate the structural integrity of the M1 Broadmeadows Estuary Bridge is maintained and protected.

Reason: In the interests of protecting the physical integrity, capacity, safety, and efficiency of national roads network. network in accordance with National Strategic Outcome no. 2 of the National Planning Framework, Departments of Housing, Local Government and Heritage, Spatial Planning and National Roads , Guidelines for Planning Authorities (2012) and TII Publications.

C. Onshore Construction Environmental Management Plan (Onshore CEMP) and Construction Traffic Management Plan (CTMP).

TII observes that other than a preferred route from Dublin Port to the grid facility (via M1 Junction 7 and R132) and a potential vehicle/load height of 5.1m, that the applicant does not provide a final route nor the potential load weights . In addition, TII notes with concern that Department of Transport Circular RW18 of 2024 ('Exceptional Abnormal Loads' is not referenced in the documentation available nor appears to have been considered in the applicants proposed process. Instead, the applicant states that the final transformer specification, vehicle configuration, route assessment, bridge assessments, permits and traffic management measures will be developed later and agreed with TII through unspecified future consultation. This ad hoc approach demonstrates a lack of understanding of the Circular's requirements but also road management in general.

TII advises that omission of an existing operational Department of Transport Circular RW18 of 2024 is a significant oversight not only with respect to the continued operation and safety of the road network(s) which the construction of this development will impact and the applicants own future construction plans for the proposed development. Therefore, to address these oversights and omissions, TII recommends the following proposed conditions be applied:

Recommended Conditions :

- o Prior to the commencement of development, a detailed Traffic Management Plan (TMP) shall be submitted for the written single agreement of relevant local authorities and TII. The matters to be addressed in the TMP relating to national road network maintenance and road safety shall include:
 - a. Demonstration that Compliance with TII Publications (Standards) in accordance with relevant TII Publications (Technical) will be required for any work that may impact the national road pavement, structures and infrastructure.
 - b. Any proposed works to the national road network, including signage, to facilitate construction traffic 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.
 - c. Any damage caused to the pavement of the existing national road due to the turning movement of abnormal 'length' loads (e.g. 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.
 - d. 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.
 - e. Separate structure approvals/permits, and other licences may be required in connection with the proposed works, including where temporary modification to the road network may be required.
 - f. In association with the above the applicant/developer shall 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. TII requests referral of all proposals agreed between the road authority, PPP Concessions and MMarC Companies and the applicant impacting on national roads.

Reason: In the interests of road safety, protection of public infrastructure and orderly development.

- Prior to the first delivery of any abnormal or exceptional abnormal load associated with the development, the applicant shall submit to, and agree in writing, with the relevant Roads Authority(s) an Abnormal Load and Exceptional Abnormal Load Management Plan, the Plan shall confirm:
 - a. The final haul route, pre- and post-delivery condition surveys of the public road network (including bridges and culverts where required), any necessary accommodation works, traffic management measures, and confirmation of statutory abnormal load permits and Garda escort arrangements.
 - b. Confirm the conclusion of the permitting process required under Department of Transport Circular RW18 of 2024 ('Exceptional Abnormal Loads')

Reason: In the interests of road safety, protection of public infrastructure, and the orderly management of abnormal load movements.

D. M1 Junction 4 and 7 and TII Motorway Maintenance and Renewal Contracts (MMaRC)

As highlighted by this submission, the North Irish Sea Array project proposes operational construction requirements (known and yet to be specified) and introduces new infrastructure within the TII Motorway Maintenance and Renewal Contracts (MMaRC) Network Area boundary. These actions and interactions will have consequences for liability and maintenance responsibilities for the operation and safety of the motorway network. In addition, further detailed design will be required and necessary to address TII Publications standards especially safety. TII recommends the following condition be applied:

Recommended Condition.

- Prior to commencement of development, the developer shall engage with Transport Infrastructure Ireland and the relevant road authorities to agree plans and details of works, construction traffic, and the management of assets thereafter, on, or in the vicinity of the national road network and associated managed areas. All detailed designs and works which interact with TII assets shall be in accordance with the requirements of TII Publications.

Reason: In the interests of protecting the capacity, safety, and efficiency of national roads network. network in accordance with National Strategic Outcome no. 2 of the National Planning Framework, Departments of Housing, Local Government and Heritage, Spatial Planning and National Roads, Guidelines for Planning Authorities (2012) and TII Publications.

E. Summary Of Recommended Conditions:

To assist the Commission and for the avoidance of doubt, a summary of TII's recommended conditions are collated below:

Recommended Conditions

1. This permission does not approve nor imply consent for any works within the M1, Motorway Reservations.

Reason; In the interests of clarity as to the construction of this permission and to safeguard the strategic function and maintain levels of safety on the national road motorway network in accordance with National Strategic Outcome no. 2 of the National Planning Framework, Departments of Housing, Local Government and Heritage, Spatial Planning and National Roads, Guidelines for Planning Authorities (2012) and TII Publications.

2. Prior to commencement of development, the developer shall submit to the satisfaction and agreement of TII Structures the appropriate technical report(s) in accordance with the requirements of TII Publications

to demonstrate the structural integrity of the M1 Broadmeadows Estuary Bridge is maintained and protected.

Reason: In the interests of protecting the physical integrity, capacity, safety, and efficiency of national roads network. network in accordance with National Strategic Outcome no. 2 of the National Planning Framework, Departments of Housing, Local Government and Heritage, Spatial Planning and National Roads , Guidelines for Planning Authorities (2012) and TII Publications.

3. Prior to the commencement of development, a detailed Traffic Management Plan (TMP) shall be submitted for the written single agreement between the relevant local authorities and TII. The matters to be addressed in the TMP relating to national road network maintenance and road safety shall include:
 - a. Demonstration that Compliance with TII Publications (Standards) in accordance with relevant TII Publications (Technical) will be required for any work that may impact the national road pavement, structures and infrastructure including drainage.
 - b. Any proposed works to the national road network, including signage, to facilitate construction traffic 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.
 - c. Any damage caused to the pavement of the existing national road due to the turning movement of abnormal 'length' loads (e.g. 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.
 - d. 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.
 - e. Separate structure approvals/permits, and other licences may be required in connection with the proposed works, including where temporary modification to the road network may be required.

In association with the above the applicant/developer shall 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. TII requests referral of all proposals agreed between the road authority, PPP Concessions and MMaRC Companies and the applicant impacting on national roads.

Reason: In the interests of road safety, protection of public infrastructure and orderly development.

4. Prior to the first delivery of any abnormal or exceptional abnormal load associated with the development, the applicant shall submit to, and agree in writing, with the relevant Roads Authority(s) an Abnormal Load and Exceptional Abnormal Load Management Plan, the Plan shall confirm:
 - a. The final haul route, pre- and post-delivery condition surveys of the public road network (including bridges and culverts where required), any necessary accommodation works, traffic management measures, and confirmation of statutory abnormal load permits and Garda escort arrangements.
 - b. Confirm the conclusion of the permitting process required under Department of Transport Circular RW18 of 2024 ('Exceptional Abnormal Loads')

Reason: In the interests of road safety, protection of public infrastructure, and the orderly management of abnormal load movements.

5. Prior to commencement of development, the developer shall engage with Transport Infrastructure Ireland and the relevant road authorities to agree plans and details of works, construction traffic, and the management of assets thereafter, on, or in the vicinity of the national road network and associated managed areas. All detailed designs and works which interact with TII assets shall be in accordance with the requirements of TII Publications.

Reason: In the interests of protecting the capacity, safety, and efficiency of national roads network. network in accordance with National Strategic Outcome no. 2 of the National Planning Framework, Departments of Housing, Local Government and Heritage, Spatial Planning and National Roads , Guidelines for Planning Authorities (2012) and TII Publications.

Transport Infrastructure Ireland again recognises that it has not a statutory consulate Schedule 1 of the Planning and Development (Maritime Development) Regulations 2023 (S.I. No. 100 of 2023). It is clear from the processing of this application that this omission in the Regulations and also the lack of organised pre-planning consultation managed and facilitated by the planning authorities concerned has led to a situation where TII has found it necessary to highlight changes to design and construction requirements at the planning application stage.

It is TII's experience that the consequences of the lack of organised pre-planning consultation has led unfortunately to issues associated with national roads, especially safety, having to be addressed by applicant, not during the development's preparation stage but much later in the planning process. This can create costs, delays and changes in projects which could have been avoided. TII will continue to work internally on our procedures and with Department of Housing Local Government and Heritage, An Coimisiún Pleanála and proactive local authorities to seek improvements in the administration of these critical pre-planning stages.

TII would appreciate acknowledgement of receipt of this submission.

Yours sincerely

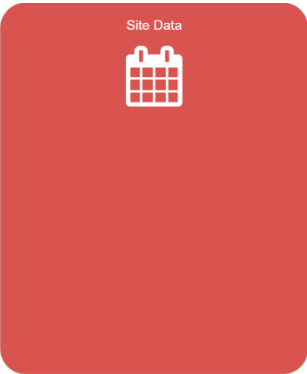


**Tara Spain ,
Head of Land Use Planning**

Enclosure: Appendix: Traffic Monitoring Units located on the M1 located between Junction 3 and 4 at Swords and Junction 4 and 5.

APPENDIX Traffic Monitoring Units located on the M1 Junction 3 and 4 at Swords and Junction 4 and 5.

TMU M01 006.0 located at the M01 Between Jn 3 & Jn 4 at NB VMS, Swords Co Dublin

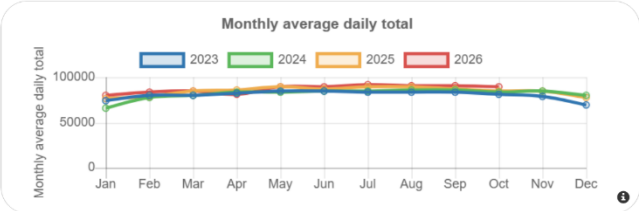
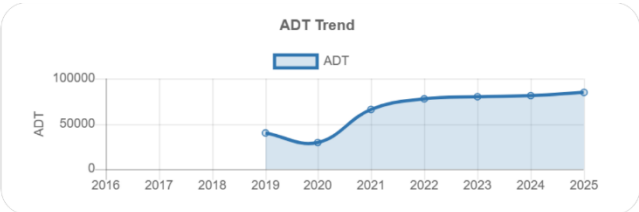
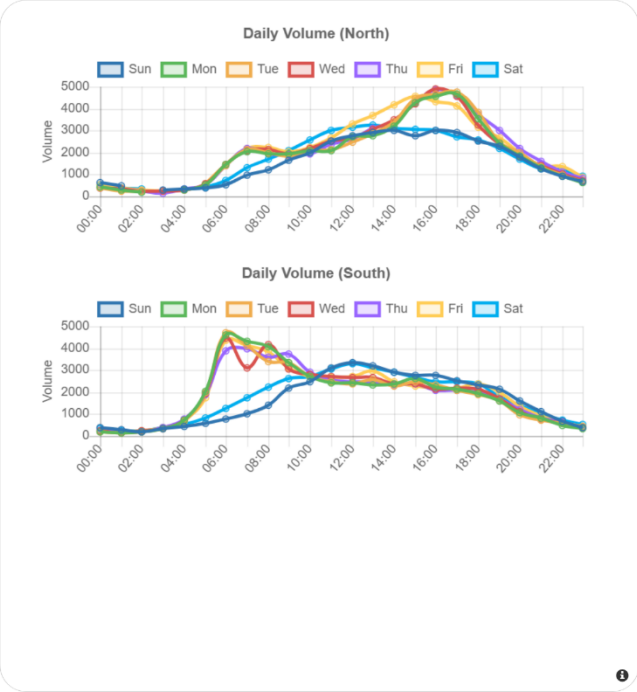


000000001017 - TMU M01 006.0
N - M01 Between Jn 3 & Jn 4 at NB VMS, Swords Co Dublin.
County: Dublin
Coordinates: 53.45946, -6.20405

Latest data is from **October 2026**

Traffic Statistics by Direction

Direction	Weekday average total traffic	7-day average traffic	Weekly traffic total
North	48,479	48,479	96,957
South	45,447	43,885	307,192



Weekly Traffic Count
186,957

7-day Average Traffic Count
93,479

Weekday Average Traffic Count
93,479

Vehicle Classification 2026

1. Motorbike Motorbikes	0.50%
2. Car Passenger cars	78.76%
3. LGV Light goods vehicles	13.06%
4. Bus Buses or coaches	0.72%
5. HGV Heavy goods vehicles	1.75%
6. Articulated HGV Articulated heavy goods vehicles	4.86%
7. Caravan Vehicles pulling caravans	0.36%

TMU M01 010.0 - M01 Between Jn04 Donabate and Jn05 Balbriggan (South), Donabate.

Site Data



000000001015 - TMU M01 010.0

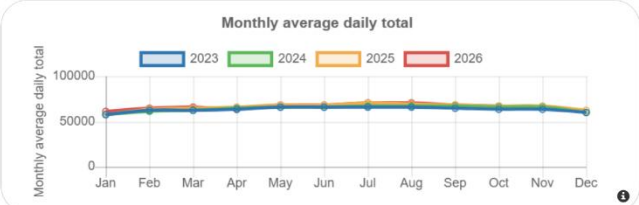
S - M01 Between Jn04 Donabate and Jn05 Balbriggan (South), Donabate

County: Dublin

Coordinates: 53.50218, -6.19982

Latest data is from **October 2026**

Traffic Statistics by Direction			
Direction	Weekday average total traffic	7-day average traffic	Weekly traffic total
South	33,553	32,602	228,217
North	36,149	34,354	240,479



Weekly Traffic Count

468,696

7-day Average Traffic Count

66,957

Weekday Average Traffic Count

69,702

Vehicle Classification 2026		
1. Motorbike		0.35%
2. Car		60.37%
3. LGV		25.28%
4. Bus		1.21%
5. HGV		7.65%
6. Articulated HGV		5.01%
7. Caravan		0.14%