

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

by e.mail; sids@pleanala.ie

Bhur dTag | Your Ref.

Dáta | Date
30 October 2025

Ár dTag | Our Ref.
TII25-132736

Re: Marine Development Application for proposed extension of port facilities to support Offshore Renewable Energy ('ORE') development and ancillary works at Port of Waterford, Belview, Co. Kilkenny

ACP case ref. OA10.323575

Dear Sir / Madam,

The Authority acknowledges receipt of referral of the above proposed Marine Development Application on behalf of Port of Waterford.

Transport Infrastructure Ireland (TII) acknowledges that the subject development proposal can contribute to achieving the national target of renewable energy generation and reduction in greenhouse gas emissions by facilitating and supporting the development of off-shore renewable energy development proposals.

In that regard, TII welcomes the development proposal which can support the transition to a low carbon and climate resilient economy, increasing renewable energy generation and enhancing energy security giving effect to National Strategic Outcome no. 8 of the National Planning Framework 'Transition to a Low Carbon and Climate Resilient Society'.

Within the foregoing context, 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 to ensure the proposed development can proceed complementary to the requirements of official policy concerning maintaining the strategic capacity and safety of the national road network in accordance with National Strategic Outcome no. 2 of the National Planning Framework 'Enhanced Regional Accessibility'.

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).

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



www.tii.ie



info@tii.ie



+353 (01) 646 3600



Parkgate Business Centre,
Parkgate Street,
Dublin 8, D08 DK10, Ireland

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, the Authority acknowledges that the application documentation submitted indicates no direct access requirements to the national road network in the first instance.

2. National Road Network Maintenance and Safety

In addition to the above, TII recommends that any operational issues impacting the national road network related to the subject development proposal should be outlined and addressed and it is noted that Chapter 16 of the EIAR submitted outlines an assessment of the potential Traffic and Transport impacts or effects arising from the proposed development.

The EIAR does not detail any issues directly impacting the national road network that require mitigation. Notwithstanding, the nature of the proposed development and the nature of the activities (both on-shore and off-shore) likely to be supported by port development have the potential to impact the strategic national road network in the area and TII recommends the Commission consider the following requirements.

2.1 Proposed Development Haul Routes

Section 16.4.2 of the EIAR submitted confirms that the 250m extension to the existing wharves will result in the generation of additional operational traffic arriving and departing the Port and Section 16.4.7 of the EIAR assesses the impacts of additional traffic during construction.

The documentation submitted does not identify any impacts from abnormal load deliveries to / from site during construction or operation.

In the interests of clarification, TII advises that any works to the national road network to facilitate abnormal loads (length, width, height or weight) to / from 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 authorities, PPP Concessions and MMarC Companies and the applicant impacting on national roads. Any 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 from / 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.

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

While the application documentation does not indicate that abnormal weight loads are a feature of the subject development proposals, proposed works may facilitate delivery of abnormal weight loads to port for onward transport. In that regard and in the interests of clarity, it should be noted that 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 any 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 development components to site where the weight of the delivery vehicle and load exceeds that permissible under the Road Traffic Regulations.

Whereas an abnormal load is defined as anything above 46 tonnes and below 180 tonnes, any load above that, represents an 'Exceptional Abnormal Load' ('EAL'). All structures to be crossed by an 'EAL' 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.

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.

Where relevant and required, all structures to be crossed by any EAL 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.

2.3 Greenways

In relation to any Greenway or Active Travel proposals in the vicinity of the proposed works, consultation with Kilkenny 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.

The Authority trusts that the foregoing comments prove of assistance to the Commission in dealing with this matter.

Yours faithfully,



Michael McCormack
Senior Land Use Planner