

Sinead White

From: Landuse Planning <LandUsePlanning@tii.ie>
Sent: Thursday 30 October 2025 14:45
To: SIDS
Subject: ACP case ref. PAX91.323448
Attachments: ACP case ref. PAX91.323448.pdf

Categories: Sinead White

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TII ref. TII25-133171

Dear Sir/Madam,

Please find attached a copy of TII observations on 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

30 October 2025

Ár dTag | Our Ref.

TII25-133171

Bhur dTag | Your Ref.

Re: Strategic Infrastructure Development Application for the Garrane Green Energy Project comprising 9 no. wind turbines, grid connection and all associated site works at Ballynagoul, Creggane and Garrane, Co. Limerick

ACP case ref. PAX91.323448

Dear Sir / Madam,

The Authority acknowledges receipt of referral of the above proposed Strategic Infrastructure Development Application on behalf of Garrane Green Energy Limited. 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.

In that regard, TII welcomes and is supportive of proposals aimed at achieving 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

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, thereby ensuring that the significant Government investment already made in the national road network is safeguarded. This requirement is further reflected in the National Development Plan, the National Investment Framework for



Transport in Ireland and also the Section 28 Ministerial Guidelines '*Spatial Planning and National Roads Guidelines for Planning Authorities*' (DoECLG, 2012).

Table 17.2: Policy and Guidance of the submitted EIAR incorrectly references the Spatial Planning and National Roads Guidelines as TII Guidance whereas they are Section 28 Ministerial Guidelines published in 2012 by the Department of Environment, Community and Local Government. Section 1.2 of the Guidelines set out that planning authorities and An Coimisiún Pleanála are required to have regard to the guidelines in the performance of their functions under the Planning Acts.

In addition, TII Publications (Standards) documentation defines the requirements for technical design standards and design procedures to govern activities with respect to the National Road Network. All relevant TII Publications (standards and procedures) are available at www.tiipublications.ie.

In relation to the subject application, TII notes that proposed Entrance no. 1 to the subject development site is taken directly off the N20 at a location where TII's records indicate a 100kph speed limit applies. Table 17.1 of the EIAR submitted outlines that the proposed temporary access on the N20 will be used for turbine delivery only and that all general construction traffic will access the site via the L1537 local road. Table 17.1 also indicates that roadside screening will be installed post-construction and it appears that the access will revert to agricultural use. Drawing no. 6839-JOD-GGE-XX-DR-C-0 submitted indicates Entrance No. 1 reinstatement details.

The Commission will note that 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. The current Limerick City and 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 outlines the following matters for the Commissions consideration in the assessment of the subject proposal concerning the proposed works at Entrance no. 1 accessing the N20, national primary road, at a location where a 100kph speed limit applies;

- The proposed temporary works to the N20 at Entrance no. 1 are for a temporary period only to facilitate turbine component delivery and thereafter temporary works shall be removed and lands reinstated following completion of the construction phase of development in the interests of road safety and adherence to the provisions of official policy.
- The proposed temporary works to the N20 at Entrance no. 1 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 works shall thereafter be permanently closed and the lands reinstated.
- Any damage caused to the pavement on the existing national road at the access from the N20, 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.

- It is noted that a Road Safety Audit (RSA) is included in Appendix 17.5 of the EIAR submitted and Entrance no. 1 has been included in the assessment. 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.
- 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.

2. National Road Network Maintenance and Safety

In addition to the above, there are a number of operational issues related to the subject development proposal, in the Authority's opinion, that are required to be considered to address network maintenance and road safety prior to any decision on this planning application.

2.1 Proposed Development Haul Route

In relation to proposed Turbine Component delivery to site, it is noted that Section 17.2.9 of the EIAR confirms Port of Entry for transportation has been assessed as both Shannon Foynes Port and the Port of Galway (turbine blades only). Appendix 17.3 and Appendix 17.4 detail Turbine Haul Route Assessments to site from the Shannon Foynes Port and the Port of Galway respectively. A number of modifications to the national road network are outlined in relation to both haul routes.

In the first instance, it should be noted that 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

Abnormal weight loads are considered in Section 17.2.14 of the EIAR and TII also notes the inclusions in Table 17.1 that outlines;

'Turbine Delivery Haul Route Assessments have been carried out for the Project and are included in Appendix 17.3 and 17.4. Vehicle weights do not exceed 180 tonnes and structures on the haul route with spans not exceeding 50m are not subject to a Category 3 structural assessment as defined in Section 1.3 of DN-STR03001 published by TII for exceptional abnormal loads'.

In the interests of clarification, an abnormal load is defined as anything above 46 tonnes and below 180 tonnes, any load above that, represents an 'Exceptional Abnormal Load' ('EAL').

Notwithstanding the comments in Table 17.1, 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. This requirement remains applicable.

In addition, while the EIAR addresses abnormal weight loads associated with turbine component delivery to site, it is unclear if any substation components represent abnormal loads above the weight loads assessed for turbine component delivery to site.

Full details of the transportation of all Abnormal Loads and all 'EALs' 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 Grid Connection Routing

In relation to the subject application, Table 17.1 of the EIAR confirms that all Grid Connection works are within the site boundary and that no grid connection works are taking place on the National, Regional or Local Road networks. Proposals outlined in the EIAR confirm that grid connection is via an on-site 110kV Substation with a 'loop in' connection to the existing 110kV OHL between Charleville and Killonan.

In the interests of clarification only, TII 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, is 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.

In relation to high voltage transmission infrastructure development, regard should also be had to the 'Electricity Transmission Infrastructure Development – Roads Sector Engagement Framework' also included in DoT Circular RW 07 of 2025.

2.4 Greenways

In relation to any Greenway or Active Travel proposals in the vicinity of the proposed works, consultation with Limerick and / or Cork 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.

In the interests of clarification, no part of this submission shall be construed as TII giving consent to access or alter any national road infrastructure assets including drainage regimes, vehicle restraint and safety systems, ducting, HDD crossings, structures, etc.

In the event that any damage is caused by any development works to the national road or associated assets, overground or underground, costs arising to fully remediate all impacted infrastructure assets to TII Publications standards and requirements will be pursued by or on behalf of TII.

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