Bonneagar Iompair Éireann
Transport Infrastructure Ireland

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

by e.mail; sids@pleanala.ie

Dáta | Date	Ár dTag | Our Ref.	Bhur dTag | Your Ref.
13 November 2025	**TII25-133394**	

Re: Strategic Infrastructure Development Application for 10 year planning permission for Ballinlee Wind Farm consisting of 17 no. wind turbines, a permanent 110kV substation and ancillary development, County Limerick

ACP case ref. PAX91.323780

Dear Sir / Madam,

The Authority acknowledges receipt of referral of the above proposed Strategic Infrastructure Development Application on behalf of Ballinlee 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

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).

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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, 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 Turbine Component Delivery Route

Section 16.4.6 of the EIAR outlines 'Delivery Vehicle Routes' with Section 2.3.6 identifying the 'Turbine Delivery Route' and Appendix 2C containing the 'Turbine Delivery Route Report' with Foynes identified as the port of entry. Haul routing includes utilising the N69, N18, M20 and N20, national roads. Minor and temporary works are proposed to facilitate turbine component delivery to site.

In the first instance, 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

While the application documentation indicates the turbine component delivery route and addresses abnormal 'length', 'height' or 'width' loads in that context, it is unclear if the

application includes provision for any abnormal 'weight' loads related to either turbine component delivery to site or related to proposed substation components.

In the interests of clarity and for the Commissions consideration, 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.

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

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.

2.3 Grid Connection Routing

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. TII respectfully requests that the Commission assess the proposed grid routing to determine that the 'optimal solution' results.

TII also 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, are 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.

As the proposed grid connection is 110kV and indicated as being taken in charge by Eirgrid on commissioning of the proposed development, TII also considers that the 'Electricity

Transmission Infrastructure Development – Roads Sector Engagement Framework' also included in Department of Transport Circular RW 07 of 2025 applies.

In relation to the specific proposal, the EIAR submitted indicates a proposed 110kV grid connection routing from the subject windfarm site to the Killonan 220/110kV substation via the local and regional road network and a section of the N24, national primary road.

Appendix 2D of the EIAR submitted includes the GCRR (Grid Connection Route Report). Section 2.2.1 of Appendix 2D addresses 'TII Road interactions' and includes the following statement;

'*To facilitate ongoing maintenance of motorways and national primary roads and avoid disruption to traffic flows, Transport Infrastructure Ireland (TII) has previously refused permission to install high voltage cables within their motorway and national primary roadways. Based on the above the installation of high voltage cables along motorways and national primary roadways is avoided where practicable.*

In the context of the Ballinlee Wind Farm grid connection, the first 700 metres of the route runs northwest along the N24 before turning south and continuing along regional and local roads toward the wind farm site. In the first 700m there are three crossings, 1 no. farm underpass and 2 no. box culverts. It is intended that the grid cable will be installed on the south side of the N24 carriageway but within the curtilage of the N24, the exact position of the cable and interface with the road curtilage will be agreed with TII and EirGrid'.

In the interests of clarity, TII advises that the Authority considers and responds to any proposals for grid connection in the national road network in the context of giving effect to National Strategic Outcome no. 2 of the National Planning Framework 'Enhanced Regional Accessibility' as well as Section 12.4.1.1 'Accelerate Renewable Electricity Generation' of the Climate Action Plan 2024 (CAP24), where the grid connection route is identified as the 'optimal solution'.

TII considers that the statement included in Section 2.2.1 of Appendix 2D is misleading to state that TII previously refused permission to install high voltage cables within their motorway and national primary roadways without the foregoing context and without acknowledging that TII is not a planning authority with decision making powers in that regard and, additionally, is often not the road authority. This statement requires clarification in TII's opinion.

In considering whether the grid connection routing proposed represents an 'optimal solution' the following is noted; the application for the Garrane Green Energy Project (ACP case ref. PAX91.323448) proposes a grid connection via an on-site 110kV Substation with a 'loop in' connection to the 110kV OHL between Charleville and Killonan. It is unclear why a 'loop in' connection to the overhead line was not proposed in the instance of the subject application given the proximity of the overhead line to the subject windfarm site, as opposed to laying grid connection in approx. 27km of public road network, including the section proposed in the N24, national road. Nor is it clear why grid connection proposals could not be co-ordinated for the Garrane Green Energy Project and the subject application.

In terms of identifying the 'optimal solution' for grid routing, TII notes proposals to HDD a grid route connection along the N24, national road, including three crossings and the provision of a joint bay within the road reservation.

In considering the proposed grid connection routing TII requests that the Commission assesses the proposed grid connection routing to determine that the 'optimal solution' results, having regard to the foregoing considerations and the potential availability of alternatives with significantly reduced impact to the road network, including the strategic national road network, in the area.

Where an 'optimal solution' for grid routing impacts the national road network, the following principles apply;

- Any cable routing should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, embankments, drainage, structures, etc. and works required to such infrastructure shall only be undertaken in consultation with and subject to the agreement of TII, any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network.
- The Commission will also note that Section 5.5 of TII Publications DN-STR-03012 (Design for Durability) requires that 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.

2.4 Greenways

In relation to any Greenway or Active Travel proposals in the vicinity of the proposed works, consultation with Limerick City and County Councils own internal project and/or design staff is recommended.

Conclusion

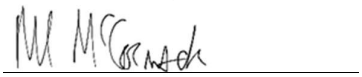
It is requested that the above matters are taken into consideration prior to any decision on the subject application.

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 Board in dealing with this matter.

Yours faithfully,



Michael McCormack
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