

## Lauren Murphy

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**From:** SIDS  
**Sent:** Wednesday 26 November 2025 11:40  
**To:** Lauren Murphy  
**Subject:** FW: Cloonkett Wind Farm  
**Attachments:** 20251125\_DoT\_Submission\_Cloonkett\_Windfarm\_sig\_copy.docx.pdf

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**From:** Transport GCU <GeneralCo-OrdinationUnit@transport.gov.ie>  
**Sent:** Tuesday 25 November 2025 15:07  
**To:** SIDS <sids@pleanala.ie>  
**Cc:** Transport GCU <GeneralCo-OrdinationUnit@transport.gov.ie>  
**Subject:** Cloonkett Wind Farm

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Good afternoon,

Please find attached for your attention submission on behalf of Department of Transport in relation to Cloonkett Wind Farm Co. Clare.

Kind regards  
Jacqui

**Jacqui Traynor**  
*Central Policy, Coordination and Reform*  
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An Coimisiún Pleanála  
64 Marlborough Street  
Dublin 1

25 November 2025

**An Coimisiún Pleanála - Case reference: PC03.317616**

**Re: Strategic Infrastructure Development (SID) Planning Application for the development of a Wind Farm consisting of 14 no. turbines (and all associated works) in the townlands of Carrowreagh East Cloondrinagh, Cloonkett, Burrenfadda, Shessiv, Craghera, Glenconaun More, Ballyduneeen, and Carrowreagh West, County Clare.**

The Department of Transport wishes to relay the following observations with regard to the proposed development which is being made under Section 37(E) of the Planning and Development Act 2000 (as amended)

It should be noted that the Department considers the construction involved in providing this development and especially, the connection cables to the national grid, may have effects on both the environment and the Regional and Local Road network.

Where the developer proposes the placement of any cables (or additional cables) in one or more trenches within the extents of the (regional and local) public road network, it is necessary to consider the following:

- Their presence within the public road will likely significantly restrict the Road Authority in carrying out its function to construct and maintain the public road and will likely add to the costs of those works post construction.
- Their installation within the lands associated with the public road may affect the stability of the road. In particular where the road is a “legacy road” (where there is no designed road structure and the subgrade may be poor or poorly drained) or bog rampart and the design needs to take account of all the variable ground conditions and not be based on a sample of



the general soil conditions. This should include a constructability assessment to a 950mm minimum cover depth to the HV Cable on legacy roads, roads over peat/bog ramparts.

- The possible effect on the remaining available road space (noting that there may be need to accommodate other utilities within the road cross-section in the future or additional drainage for climate adaptation) on potential future development.
- The necessity to have the power in the cables switched off (particularly where structural failures occur due to extreme weather events) where the Road Authority considers this necessary in order to carry out its function to construct and maintain the public road and a complete operation and maintenance manual should be agreed with the Local Authority.

In this regard, please refer 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/department-of-transport/publications/electricity-transmission-infrastructure-development-roads-sector-engagement-framework-interim-guidance/>

The 'Interim Guidelines' 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.

Notwithstanding, in relation to proposed works utilising regional and local road network, as part of the grid connection routing, it is the Departments opinion that the proposed routing must be undertaken in a manner to avoid the potential to impact on future maintenance, improvement and operation of the road network in this area.

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'. Having regard to the measures identified in CAP24 and the information in relation to grid routing included in the subject application, the Department recommends that there is a requirement that the Board establish that the routing proposed represents the 'optimal solution'.

The Department consider it important that the examination of the proposal should include consideration of the following:

- Examination of all available technologies including both Overhead Line (OHL) and Underground Cable (UGC) options (or combinations of both) and route options other than the routing of cables along the public road to ensure the best performing route and technology option is selected, (ensuring compliance with CAP24). The public road should only be considered following a robust MCA determining the optimal solution including examining the most linear solutions,
- Examination of options for connection to the national grid network at a point closer to the wind farm in order to reduce the adverse impact on public roads,

In terms of detailed design of any cable routing impacting the regional and local road network, without prejudice and in accordance with DoT 'Interim Guidelines', the Department would recommend the following conditions should be applied to any grant of permission that includes the laying of high voltage electricity cable in the road network where that routing is identified as the 'optimal solution';

1. Prior to commencement of development, engagement with the planning authority should discuss and agree the route for the HV Cable(s) to identify/agree the routing 'optimal solution' along with the associated requirements for traffic management, road opening licencing, times of work, reinstatement, positioning of chambers/ joint bays etc.
2. A condition requiring the developer to, at a minimum, comply with all appropriate standards and, inter alia the Guidelines for Managing Openings in Public Roads, 2017 in order to ensure orderly development.
3. Electricity cabling shall be laid off carriageway where feasible.



4. Wherever possible, joint bay structures are best located off the carriageway in verges, open spaces, or adjacent sites; and where they must be under carriageway, joint bay structures will be to accepted design standards.
5. High/medium voltage transmission underground cables should not be sited on or attached to existing roads structures, masonry bridges/ culverts and the like.
6. A condition requiring that the location of the cables would be recorded as exactly as possible, using BIM type technology, so as to facilitate the further use of road space for utilities and the maintenance/construction of the public road by the Roads authority. This record should include as constructed surveys of all infrastructure altered, added, removed or relocated and exact detail of the road construction including any drains or other features encountered. The record should be lodged with the local authority and with the ESB Networks for retention on their records.
7. A condition requiring the replacement of culverts that have been excavated during the cable duct placement operation. The replacement culverts should be designed appropriately and include an allowance for the effects of climate change.
8. A condition requiring the developer to notify the Roads Authority of the owner of the cables (Owner) and the controller (Power Controller) of the power transmitted along the cables. In addition, the condition should require Owner and Power Controller to notify the Roads Authority of any change in ownership of the cables or change of Power Controller transmitting power along the cables. In all instances the Owner and Power Controller should be required to maintain an agreed contacts list with the Roads Authority.

Yours sincerely,

DocuSigned by:  
*Robert Swan*  
614CE98BAA7042E

Department of Transport