Niamh Hickey

From: Landuse Planning <LandUsePlanning@tii.ie>
Sent: Monday 15 December 2025 16:01
To: SIDS
Subject: ACP case ref. VA92.323821 (Buirios Limited)
Attachments: ACP case ref. VA92.323821.pdf

Categories: Niamh

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TII ref. TII25-133797

Dear Sir / Madam,

Please find attached a copy of TII's observations on the above Electricity Development Application.

Yours sincerely,
Michael McCormack
Senior Land Use Planner

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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.
15 December 2025	TII25-133797	

Application for development of a 110kV AIS substation, 110kV underground cabling and ancillary development at Clonmore and Strogue, Tipperary

ACP case ref. VA92.323821

Dear Secretary,

The Authority acknowledges receipt of referral of the above proposed Electricity Development Application on behalf of Buirios Limited. The subject development proposal provides for a 110kV substation and grid connection which will export electricity generated from a consented windfarm (Borrisbeg Windfarm, PA92.318704) to the existing 110kV Ikerrin to Thurles overhead line (OHL).

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 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).

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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 in relation to the subject application for a proposed 110kV grid connection and related works indicates no direct access requirements to the national road network in the first instance. TII's observations in relation to the associated windfarm application (ACP Case ref. PA92.318704) remain as set out in TII's previous submissions related to that application.

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 the proposed transportation of any abnormal sized loads to site associated with the subject development proposals, the following points should be noted.

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 substation 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

In relation to abnormal loads, TII notes the inclusions in Table 14.1 that outlines that the construction of the Borrisbeg Renewable Energy Development will require the delivery of abnormally large loads although, it is stated, the axle loadings will not exceed accepted limits.

Although unclear, it is likely that substation components may also potentially include 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 14.1, 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, as noted, 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, TII notes the grid connection routing from the consented windfarm site to the existing 110kV Ikerrin to Thurles overhead line has no direct impact on the strategic national road network in the area.

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.

Section 6.1 of the Planning Report that accompanied the subject application confirms that the substation will connect the Consented Wind Farm to the national grid and remain part of the national grid infrastructure after decommissioning of the Consented Wind Farm. Therefore, TII is of the opinion that the 'Electricity Transmission Infrastructure Development – Roads Sector Engagement Framework' also included in Department of Transport Circular RW 07 of 2025 applies.

2.4 Greenways

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