

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

by email; sids@pleanala.ie

Dáta | Date

11 March 2026

Ár dTag | Our Ref.

TII26-135295

Bhur dTag | Your Ref.

Re: Strategic Infrastructure Development (SID) Application for Battery Energy Storage System Development located in Knockraha, County Cork. An Coimisiún Pleanála. case ref. VA04.324082

Dear Sir / Madam,

The Transport Infrastructure Ireland (TII, "the Authority") 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'.

In the Authority's opinion there are a number of operational issues related to the subject development proposal, in combination with the related planning application, that are required to be considered to address network maintenance and road safety prior to any decision on this planning application. For clarity, TII has relies on documents provided by the applicant on the website www.drumkeelcis.com, as the Commission's website does not include documents at the time of assessment.

Section 3.4 Construction Traffic Haul Route of the "*Battery Energy Storage System, Ballynanelagh, Co. Cork Outline Construction Traffic Management Plan*" indicates that transportation to site of Abnormal Loads from port of entry at Kennedy Quay via the N8, M8 and Junction 17. While the assessments undertaken in relation to abnormal load delivery to site makes reference to a limited number of such loads are expected the applicant has provided no information provided as to an assessment that the capability of the network identified will be able to accommodate such loadings

nor temporary works to the national road network are identified which may be required as a result of this assessment.

TII recommends that any permission granted by An Bord Pleanála for the proposed development would provide the following requirements as a planning condition:

1. 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.

Such agreement shall include and address the following requirements;

a) The Exceptional Abnormal Load Vehicle diagram shall be provided to include Gross Vehicle Weight; Individual Axle Weights; Axle Spacing; and total vehicle length, width, and height. Exceptional Abnormal Load Vehicles shall comply with the standard configuration of a trailer with two bogies and two tractors; one pulling and one pushing as detailed within TII Publications AM-STR-06048.

b) All bridges 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 the load safely and without any damage.

c) A Chartered Engineer with appropriate experience of assessing bridges for such Exceptional Abnormal Loads shall be required to certify that each structure to be crossed can sustain the loading regime safely and without damage. Appropriate Professional Indemnity Insurance shall also be in place.

d) Each local authority (who own the bridge assets and issue the load permits) shall be provided with an appropriate level of indemnity proportionate to the risk and the value of the bridge structures to be crossed.

e) Each local authority (who own the bridge assets and issue the load permits) shall be provided with insurance cover appropriate to the Risk and the value of the bridge structures to be crossed.

f) Pre-structural surveys and post-structural surveys will be required.

2. All necessary works required to accommodate the development proposals shall be identified. Any proposed works to the national road network 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. Works should ensure the ongoing safety for all road users.
3. Any damage caused to the pavement of the existing national road (e.g. 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.
4. 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 required.
5. 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.
6. 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.

7. All necessary Deed of Indemnity , licenses, approvals, or agreements with the local road authorities and TII shall be in place prior to any development commencing on site.

Reason; In the interests of safeguarding levels of safety and the strategic function of the national road network in accordance with National Strategic Outcome Number 2 of the National Planning Framework.

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.

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

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

Yours faithfully,



Tara Spain
Head of Land Use Planning