

Lauren Murphy

From: Landuse Planning <LandUsePlanning@tii.ie>
Sent: Monday 18 May 2026 14:24
To: SIDS
Subject: ACP case ref. PAX03.324155 (Cahermurphy Renewables DAC)
Attachments: ACP case ref. PAX03.324155.pdf

Categories: Lauren

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TII ref. TII26-135778

Dear Sir / Madam,

Please find attached a copy of TII's observations in relation to 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
18 May 2026

Ár dTag | Our Ref.
TII26-135778

Bhur dTag | Your Ref.

Re: Strategic Infrastructure Development Application for a 10 year planning permission for the Cahermurphy Wind Farm consisting of 8 no. wind turbines, 110kV electrical substation and ancillary development at Cahermurphy, Carrowmagry South, Castlepark, Caheraghacullin, Doolough, Drummin, Kilmihil and Knocknahila More South, County Clare

ACP case ref. PAX03.324155

Dear Sir / Madam,

The Authority acknowledges receipt of referral of the above proposed Strategic Infrastructure Development Application on behalf of Cahermurphy Renewables DAC. 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).



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 and Substation Component Delivery Route

Section 15.1.2.2 of the EIAR submitted details a turbine component delivery route to site from the port of entry at Foynes via the N69, N18, M18, N85 and N68 national roads. Section 15.1.3 of the EIAR outlines 'Temporary accommodation works on the Turbine Delivery Route' and identifies temporary works to the N68 / R484 Junction at the Crossroads Bar.

In relation to temporary works to the N68 / R484 junction, TII advises;

- **Temporary Access during construction**
*Design Report: Temporary accesses do not require a formal Design Report.
Temporary Traffic Management: These sites must be managed as roadworks for the entire duration of their opening and remain under approved traffic management measures. Note: This falls under the remit of the Road Authority.*
- **Reinstatement**
If the site is fully reinstated to its exact pre-works condition, no further action is required. Where the final site includes any changes to the road layout, junction layout, roadside furniture, and/or boundary conditions (e.g., replacing a fence with a wall, closing the junction with a temporary structure, etc.), a Design Report will be required of this post construction solution.

Section 15.1.9 of the EIAR outlines that based on the swept path analysis undertaken for the blade transporter at the N68 / R484 Junction at the Crossroads Bar it is established that local road widening, including the temporary removal of a wall, street furniture and vegetation removal/trimming is required and proposed on the eastern side of the R484 regional road adjacent to the Crossroads Bar. The EIAR confirms that conditions at this location will be reinstated to as existed pre-construction. Having regard to the foregoing, TII advises that a formal Design Report is not required.

Though it is noted that a Design Report is included in Appendix 15-5 of the EIAR submitted and Section 15.1.11 EIAR indicates that the report will be uploaded onto TII's Departures Portal upon submission of this EIAR and planning application, TII advises as of 18 May, 2026, TII has no record of any Design Report formally submitted in relation to the proposed works.

In relation to any temporary enabling works to facilitate turbine and substation component delivery to site, TII advises 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

Section 15.1.1.1 of the EIAR submitted in support of the subject application outlines that it should be noted that abnormal weight loads are not a feature of the turbine delivery vehicles, they are abnormal in size only and that all construction and delivery vehicles for the Proposed Project will be subject to the standard axle weight requirements set out under Road Traffic (Construction and Use of Vehicles) Regulations 2003 (S.I. No. 5 of 2003) and therefore the loadings from construction traffic will not exceed the relevant standards. The applicant further states that notwithstanding the need to use specialist vehicles to facilitate turbine delivery, it should be noted that the number of load-bearing axles for any specialist vehicles carrying large loads are designed to ensure that the load on any one axle does not exceed acceptable load bearing statutory limits, and, therefore, the structural integrity of the national and regional road network used during the construction of the Proposed Project is adequate to provide for these accepted loads.

While TII notes the confirmation provided in relation to turbine component delivery to site, it is unclear if any substation components may represent an abnormal load.

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. In that regard, TII recommends consideration to the inclusion of the following condition to address the potential for any abnormal or exceptional abnormal loads associated with Turbine and Substation Component delivery to site.

Proposed Condition;

'Prior to the first delivery of any abnormal or exceptional abnormal load associated with the development, the applicant shall submit to, and agree in writing, with the relevant Roads Authority(s) an Abnormal Load and Exceptional Abnormal Load Management Plan. The Plan shall confirm the final haul route, pre- and post-delivery condition surveys of the public road network (including bridges and culverts where required), any necessary accommodation works, traffic management measures, and confirmation of statutory abnormal load permits and Garda escort arrangements. Prior to the first delivery of any exceptional abnormal load, the permitting process required under Department of Transport Circular RW18 of 2024 ('Exceptional Abnormal Loads') shall be completed to the satisfaction of the planning authority.

'The delivery of abnormal or exceptional loads may take place outside standard construction working hours where required under the statutory abnormal load permitting process and as agreed with the relevant Roads Authority(s).

'Reason: In the interests of road safety, protection of public infrastructure, and the orderly management of abnormal load movements'.

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)' and the associated update issued with Circular RW 05 of 2026, both of 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.

TII acknowledges that Section 1.1 of the EIAR submitted confirms that a separate planning application in accordance with Section 182A of the Planning and Development Act will be submitted for the 110kV underground cabling connecting Cahermurphy West Wind Farm to Moneypoint 110kV electrical substation. An Coimisiún Pleanála case reference VA03.324156 refers and TII will make a separate submission in relation to this element of the proposed development.

2.4 Greenways

In relation to any Greenway or Active Travel proposals in the vicinity of the proposed works, consultation with Clare 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
Senior Land Use Planner