

Lauren Murphy

From: Landuse Planning <LandUsePlanning@tii.ie>
Sent: Friday 15 May 2026 11:18
To: SIDS
Subject: ACP case ref. VA03.324156 (Cahermurphy Renewables DAC)
Attachments: ACP case ref. VA03.324156.pdf

Categories: Lauren

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TII ref. TII26-135779

Dear Sir / Madam,

Please find attached a copy of TII observations on the above proposed Electricity 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
15 May 2026

Ár dTag | Our Ref.
TII26-135779

Bhur dTag | Your Ref.

Re: Application for development of a 10 year planning permission for a 110kV grid connection to the national grid at the existing 110kV Moneypoint Substation at Cahermurphy, Cloonwhite South, Sheeaun, Leitrim, Cloonreddan, Kilmacduane East, Clooncullin, Lissanair, Teernagloghane, Brisla East and West, Gowerhass, Tullagower and others, County Clare

ACP case ref. VA03.324156

Dear Secretary,

The Authority acknowledges receipt of referral of the above proposed Electricity Development Application on behalf of Cahermurphy Renewables DAC. The subject development proposal provides for a 110kV grid connection which will export electricity generated at the proposed Cahermurphy Wind Farm (associated case ref. PAX03.324155) site via an underground cable to the existing Moneypoint 110kV substation.

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. PA93.321522) remain as set out in TII's submission 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 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 considering the subject proposal, 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)' 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', as outlined in the Circulars, 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.

Section 4.6 of the EIAR submitted in support of the application outlines that the onsite 110kV electrical substation and 110kV electrical cabling will remain in place as it will be under the ownership of the ESB and will form a permanent part of the national electricity grid. Therefore, TII considers that regard should also be had to the 'Electricity Transmission Infrastructure Development – Roads Sector Engagement Framework' included in DoT Circular RW 07 of 2025.

The 'Interim Guidance to Road Authorities (placement of Medium or High Voltage electricity assets)' outlines the requirement for applicants to engage with the road authority to determine the 'optimal solution' for grid connection routing, an approach that is consistent with CAP 24 provisions.

It is unclear that DoT Circulars RW 07 of 2025 and RW 05 of 2026 have been considered in the preparation of the subject application grid connection proposal.

In relation to the specific application, proposals for a c. 25km grid connection cable routing to the Moneypoint substation are proposed and the following national road interactions are noted;

- One crossing of the N68, indicated on Drawing no. 05935-DR-205 as being by HDD,
- One crossing of the N67 indicated on Drawing no. 05935-DR-202 and Appendix 4-4 as not being by HDD,

- Lateral laying of 300m of grid connection cable routing in the N67 (Table 15-30 of the EIAR submitted refers),
- Joint Bay No. 02 (off but in the vicinity of the N67).

In accordance with the National Planning Framework National Strategic Outcome no. 2 'Enhanced Regional Accessibility', there is a requirement to maintain the strategic capacity and safety of the national road network. This requirement is further reflected in the National Development Plan, the National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

TII has identified a number of significant implications for TII and road authorities in the management and maintenance of the strategic national road network resulting from the laying of high voltage electricity cabling in the national road reservation, including;

- Impacts on embankments, bridges, drainage and road furniture infrastructure leading to future maintenance liabilities,
- Impediments to future maintenance and operations activities, such as safety barrier repair and French drain renewal,
- Impediments to future routine network improvements such as pavement overlay and strengthening, installation of new verge-side signs and other road furniture,
- Impacts on network traffic flows during installation,
- Impediment to future on-line upgrades of national roads because of the implications to road authority / TII in having to incur the additional costs of moving underground cables in order to accommodate the road improvements.

Proposals to lay cable in the national road reservation have the potential to impact road authorities and TII in undertaking future maintenance and improvement requirements. There may also be additional cost implications to national road improvements and maintenance resulting from the presence of high voltage cabling within the national road reservation.

Having regard to the measures identified in CAP24 and the information in relation to grid routing included in the subject application, TII recommends that the Commission be satisfied that the proposed grid routing represents the optimal routing solution.

In relation to the standard construction details and specifications outlined in the subject application, TII notes that typical trench sections / standard details are outlined in Drawing no.'s 05-935-DR-253 to 05935-DR-260, and 05935-DR-262 to 05935-DR-263. Typical Joint Bay details are shown in Drawing no.'s 05935-DR-272 and 05935-DR-273.

TII also notes that Row 11 Table 15.1b of the EIAR submitted outlines that the Proposed Grid Connection underground cabling design is subject to ESNB specification and no deviation from this will be acceptable to ESNB, who will take ownership of the cabling, once complete.

The Statement (Row 11 Table 15.1b) is inconsistent with Department of Transport Circulars RW 07 of 2025 and RW 05 of 2026, and the 'Interim Guidance', as outlined in the Circulars, 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.

To address the inconsistent approach proposed in the subject application, TII recommends that the Commission has regard to the requirements of Department of Transport Circulars RW 07 of 2025 and RW 05 of 2026. The Authority respectfully proposes the following condition for the Commission's consideration in relation to grid connection routing proposals;

Proposed Condition;

'Crossings of the N67 and N68 national road network shall be by HDD only. All standards for grid connection cable construction and associated infrastructure in the public road shall be agreed with the Road Authority prior to the commencement of any development.'

'Reason; In the interests of clarity as to the construction of this permission, to ensure adherence to Department of Transport Circulars RW 07 of 2025 and RW 05 of 2026, to safeguard the strategic function and maintain levels of safety on the national road network in accordance with National Strategic Outcome no. 2 of the National Planning Framework, RPO 140 of the Southern Regional Assembly Regional Spatial and Economic Strategy and Development Plan Objective CDP 11.11 of the Clare County Development Plan, 2023 – 2029'.

TII requests that the Commission assesses the proposed grid routing to determine that the 'optimal solution' results, having regard to the foregoing considerations.

Where an 'optimal solution' for grid routing impacts the national road network, TII requests that any permission granted includes the above proposed condition and that 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.

2.2. Proposed Turbine and Substation Component Delivery to Site

TII acknowledges that Section 1.1 of the EIAR submitted confirms that a separate planning application in accordance with Section 37E of the Planning and Development Act, 2000, as amended, is submitted seeking permission for the Cahermurphy West Wind Farm and that the planning application for the Proposed Wind Farm will include the 110kV electrical substation and wind farm control building. An Coimisiún Pleanála case ref. PAX03.324155 refers.

TII will make a separate submission in relation to that separate application.

2.3 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 Commission in dealing with this matter.

Yours faithfully,

A handwritten signature in black ink, appearing to read "M McCormack". The signature is written in a cursive style and is positioned above a horizontal line.

Michael McCormack
Senior Land Use Planner