

The Secretary
An Coimisiún Pleanála
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by e.mail; sids@pleanala.ie

Dáta | Date

21 May 2026

Ár dTag | Our Ref.

TII26-135821

Bhur dTag | Your Ref.

Re: Strategic Infrastructure Development Application for a 220kV Substation and 220kV underground electricity cabling connecting to the existing Cashla 220kV substation in the townlands of Rathmorrissy, Pollnagroagh, Moanbaun, Castlelambert, Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkyle East, Barrettspark, Cashla, Athenry, County Galway

ACP case ref. VA07.324162

Dear Sir / Madam,

The Authority acknowledges receipt of referral of the above proposed Electricity Development Application on behalf of Bord Gais Energy Limited. Transport Infrastructure Ireland (TII) acknowledges that the subject development proposal can contribute to achieving the national target of renewable energy generation, reduction in greenhouse gas emissions and resilience in energy supply.

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).



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, TII 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

Notwithstanding the above, in the Authority's opinion there are a number of operational issues related to the subject development proposal that are required to be considered to address network maintenance and road safety to support any decision on this planning application.

2.1 Transportation of Abnormal Loads and Exceptional Abnormal Loads

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 require 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.

The details submitted with the application, including Appendix 2.6 '*Exceptional Abnormal Load Report*', details the potential for 3 no. exceptional abnormal loads associated with the subject development proposal, as follows;

Component	Weight (tonnes)
Gas Turbine	360
Generator	380
Step-up Transformer	288

It should be noted that the individual component weights do not include the weight of the transport vehicles, therefore, the actual loading on associated road structures will be significantly greater than that detailed in the application.

In the interests of safeguarding the strategic function, levels of safety and integrity of the national road network and associated structures, it is critical that adopted procedures for managing and approving Abnormal Loads and Exceptional Abnormal Loads on Ireland's road network are applied in accordance with Department of Transport Circular RW18 of 2024 ('Exceptional Abnormal Loads').

Having regard to the foregoing, TII acknowledges that the applicant has engaged in the Exceptional Abnormal Loads permitting process set out in DoT Circular RW18 of 2024 and also welcomes that the applicant has prepared the 'Exceptional Abnormal Load Report' included in Appendix 2.6 of the EIAR submitted in support of the application. Notwithstanding, it is unclear that the permit process outlined in DoT Circular RW18 of 2024 has been fully completed by the applicant.

In the interests of resolution of this matter, while TII notes that Section 2.3.6 of the '*Planning Statement*' submitted in support of the subject development proposes wording for a condition associated with the management of abnormal and exceptional abnormal loads, TII does not consider that the proposed wording sufficiently addresses the outstanding matters concerned.

In that respect, TII respectfully proposes the following wording alteration (in red) to the applicants proposed condition wording as follows;

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 the 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'.

TII respectfully requests that the Commission include the above proposed condition in any decision to grant permission for the subject development, in the interests of safeguarding the strategic function, levels of safety and integrity of the national road network and associated structures impacted by the subject development proposal.

2.2 Management of the Strategic National Road Network

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 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 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.

2.3 National Grid Connection

It is noted that proposals to connect the subject development proposal to the national grid propose the construction of a new on-site substation and a grid connection cable routing to the Cashla 220kV Substation.

The EIAR submitted in support of the application confirms that the onsite 220 kV substation will remain under the control of EirGrid and will form part of the national grid.

The grid connection routing to the Cashla 220kV substation details 3 proposed motorway crossings, one of the M18 parallel to local road L3103 and two (no.) of the M6 parallel to local road L7109 and secondly parallel to local road L7108. All proposed motorway crossings are by HDD trenchless technology.

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.

In relation to high voltage transmission infrastructure development, noting the substation will remain under the control of EirGrid and will form part of the national grid, 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. In that regard, TII notes the concurrent appeal case for the 'Gannow Windfarm', case ref. PL07.500493.

The current application and the Gannow Windfarm application both detail grid connection proposals to the Cashla 220kV Substation and both appear to seek to utilise the same sections of local road in some instances. Clarification may be necessary to demonstrate that the proposals can both be accommodated in the finite road space, where proposed grid connection routes interact. Opportunities to co-ordinate proposals in that regard, to ensure deliverability and to mitigate impact to the road network, may be available.

In addition, TII notes that the Gannow Windfarm application proposes only one motorway crossing whereas the subject application for the Cashla Peaker Power Plant proposes three separate HDD Crossings of the motorway network, one no. of the M18 and two no. of the M6.

Opportunities to optimise grid routing to minimise impact to the strategic national road network may be available and could potentially be achieved through greater co-ordination by the energy sector.

2.3.1 Requirements for HDD Crossing of the Motorway Network

Without prejudice to the foregoing, the proposed HDD crossings of the Motorway network require consent under Section 53 of the Roads Act. In addition, other consents may be required, for example, local authority consent, licencing or arrangements for third party access to the national road network, etc.

Contact should be made to 'thirdpartyworks@tii.ie' to progress proposals for any HDD motorway crossing and consultation, as required, should also take place with relevant PPP Companies and MMarC Contractors as well as the local road authorities.

General requirements for directional drilling under a motorway include;

- The launch and reception pits for the crossing are located outside the Motorway boundary,
- The cabling/pipeline will be installed at such depth so as not to conflict with the drainage for the Motorway,
- Neither the Works nor the cable crossing will damage or interfere with the Motorway,
- Any maintenance and/or future planned upgrades of the cabling/pipeline at the crossing location can be carried out without access to the motorway boundary,
- There are no bolted joints in that part of the crossing within the motorway fence-line,
- A pre and post construction survey shall be required along the length of the crossing over the extents of the motorway boundary,
- Specific requirements may also arise for these proposed works.

Any cable routing should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, 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.

2.4 Safeguarding the National Motorway Network

Save for addressed in the forgoing, the project details submitted with the subject application do not outline other impacts to the adjoining Motorway network, however, the red line planning application site boundary for the proposed development combined with the concurrent application for the proposed open-cycle gas turbine power plant and associated works, i.e. the Cashla Peaker Power Plant under ACP case reference PA07.324113, adjoin the M6, M18 and M17 motorway reservation boundaries.

In the interests of clarity, TII has not provided any consent for any works within the motorway reservation and based on the level of information accompanying the subject application, all works proposed and as indicated in the subject application details can be executed outside the Motorway Reservation.

Having regard to the foregoing and in the interests of adhering to the requirements of official policy concerning maintenance of the strategic capacity and safety of the national road network in the area TII would welcome clarification in any decision on the planning application

that the permission granted does not consent to any works within the motorway reservation and respectfully suggest the following proposed condition;

Proposed Condition;

This permission does not approve nor imply consent for any works within the M6, M17 and M18 Motorway Reservations.

Reason; In the interests of clarity as to the construction of this permission and to safeguard the strategic function and maintain levels of safety on the national road motorway network in accordance with National Strategic Outcome no. 2 of the National Planning Framework, RPO 6.5 of the Northern and Western Regional Assembly Regional Spatial and Economic Strategy and Policy Objective NR 1 of the Galway County Development Plan, 2022 – 2028.

TII also considers it relevant to address the potential for on-site external lighting to impact the safety of road users on the adjoining national road network resulting from glare, overspill or potential distraction. In that regard, TII also respectfully requests the following proposed condition to be included in any decision on the subject application;

Proposed Condition;

All external lighting shall be designed, installed and maintained to ensure no incidence of glare, overspill or potential distraction to road users on the adjoining motorway network. Lighting shall be directed and cowled, where warranted, and all external lighting details shall be agreed with the planning authority prior to commencement of development. Agreement with the planning authority shall provide for monitoring and subsequent modification or amendment to external lighting where glare, overspill or potential distraction to road users arises.

Reason; In the interests of safeguarding the strategic function and maintaining levels of safety on the national road motorway network in accordance with National Strategic Outcome no. 2 of the National Planning Framework, RPO 6.5 of the Northern and Western Regional Assembly Regional Spatial and Economic Strategy and Policy Objective NR 1 of the Galway County Development Plan, 2022 – 2028.

2.5 Greenways

In relation to any Greenway or Active Travel proposals in the vicinity of the proposed works, consultation with Galway 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 dark ink, appearing to read "M McCormack", is written over a horizontal line.

Michael McCormack
Senior Land Use Planner