

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

Dáta | Date

6 August 2026

Ár dTag | Our Ref.

TII26-136785

Bhur dTag | Your Ref.

Re: Strategic Infrastructure Development Application for the Littleton Wind Farm comprising of 11 no. turbines and all associated works, Co. Tipperary

ACP case ref. PAX92.324370

Dear Sir / Madam,

The Authority acknowledges receipt of referral of the above proposed Strategic Infrastructure Development Application on behalf of Littleton Wind Farm Designated Activity Company. 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.

TII notes no requirement for new permanent direct access or intensification of existing private access to the national road network with the potential to conflict with the foregoing provisions of official policy included in Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

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 4.4.3, Section 15.5.4.4.1 and Appendix 4.2 'Abnormal Indivisible Load Route Survey Report' of the EIAR submitted in support of the subject application addresses the Turbine Delivery Route. The EIAR outlines a proposed delivery route from port of entry at Foynes utilising the N69, N18, M7 and M8 national roads to site.

It is acknowledged that Section 4.4.3.1 of the EIAR outlines that temporary accommodation works are required along the turbine delivery route to facilitate the delivery of large components to the site and that no permanent road widening or junction accommodation works are required. It is confirmed that all temporary accommodation works associated with the turbine delivery route will be fully reinstated following the construction stage.

Having regard to the foregoing, TII outlines the following observations to assist the Commission in the assessment of the subject application.

In the first instance, 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 and 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 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 4.4.3 and Section 15.5.4.4 of the EIAR submitted confirms that a substation transformer unit will be transported to site which will be categorised as an abnormal load and that an abnormal load permit will be sought for this movement.

Section 15.5.4.4.1.2 'Crossings and Structures along the TDR' of the EIAR advises that there are a number of existing watercourse crossings along the TDR that will be crossed by oversized loads associated with the delivery of turbine components, it has been determined that no structural modifications are required, and that the bridges are suitable for turbine delivery vehicles to traverse it. However, it is unclear that the confirmation relates to substation component delivery to site or indeed to all national road structures, including, for example road overbridges, etc. Therefore; TII outlines the following observations 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' 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 of 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

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 Ballyragget 110kV Substation. TII acknowledges that the national grid connection proposals are subject to a separate planning application process as referenced in Section 4.2.1 of the EIAR submitted, and TII propose to make a separate submission in that respect. Notwithstanding, TII recommends the following matters are taken into consideration in the preparation and assessment of future proposed grid routing;

Reference should be made 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.

TII acknowledges that the applicant has referenced the 'Interim Guidance' in Section 15.5.2.1 of the EIAR submitted in support of the subject application.

The grid connection routing to the Ballyragget 110kV substation details approx. 1km of grid connection routing along the N77 and possibly 3 no. joint bays in the N77 road reservation. The Commission will be aware of a number of renewable energy development proposals grid connections to the Ballyragget 110kV substation with routing identified along the same sections of the N77, national road. For example, Kilkenny County Council planning application references 23/60248 and 25/60003 refer.

Clarification may be necessary to demonstrate that proposals can all 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.

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 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 applicant demonstrate and the Commission be satisfied that the proposed grid routing in any subsequent application represents the optimal routing solution.

Finally, while TII notes a number of standard construction detail drawings and specifications are set out in Appendix 4.3 of the EIAR submitted in support of the application which outline standard construction details to Eirgrid Specifications, the Commission will note that the Department of Transport Circulars RW 07 of 2025 and RW 05 of 2026, and the 'Interim Guidance', which, 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.

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 Board in dealing with this matter.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'M McCormack', is written over a horizontal line.

Michael McCormack
Senior Land Use Planner