From:	Landuse Planning
To:	SIDS
Subject:	ACP case ref. VA12.324597 (FuturEnergy Lissinagroagh DAC)
Date:	Thursday 17 September 2026 13:06:47
Attachments:	ACP case ref. VA12.324597.pdf

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TII ref. TII26-137573

Dear Sir / Madam,

Please find attached a copy of TII observations on the above Electricity Development Application.

Yours sincerely,
Michael McCormack
Senior Land Use Planner

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Bonneagar Iompair Éireann
Transport Infrastructure Ireland

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

by e.mail; sids@pleanala.ie

Dáta | Date	Ár dTag | Our Ref.	Bhur dTag | Your Ref.
17 September 2026	**TII26-137573**	

Re: Planning Application for a 110kV substation and a 110kV grid connection route to facilitate Lissinagroagh Wind Farm located in various townlands across counties Leitrim and Sligo

ACP case ref. VA12.324597

Dear Secretary,

The Authority acknowledges receipt of referral of the above proposed Electricity Development Application on behalf of FuturEnergy Lissinagroagh DAC. The subject development proposal provides for a 110kV onsite electrical substation and a 110kV grid connection routing between the Lissinagroagh Wind Farm (ACP case reference PAX12.324290) and the existing Srananagh 220kV Substation.

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.

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In that regard, the Authority acknowledges that the application documentation submitted in relation to the subject application for a proposed 110kV substation, grid connection routing and related works 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 Development Component Haul Route

TII has addressed the transportation of windfarm components to site in TII's submission on the related windfarm application under An Coimisiún Pleanála case ref. PAX12.324290. However, it is unclear if the subject application includes proposals for the transportation of any abnormal loads associated with the proposed 110kV substation. Therefore, in relation to the proposed transportation of any abnormal sized loads to site associated with the substation proposal, the following points should be noted.

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 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 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 16.2.6 'AIL Route Assessment Considerations' of the EIAR submitted in support of the application addresses abnormal indivisible loads, however, it appears that such loads are only assessed in terms of geometric requirements of the vehicles and the ability of the road network to accommodate the dimensions and manoeuvring needs of turbine component deliveries, as noted in Section 16.2.2 of the EIAR submitted. Therefore, it is unclear if any of the proposed

abnormal loads referenced in the EIAR submitted relate to an abnormal 'weight' loads, which will have particular requirements.

In the interests of clarity, 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 or substation 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 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 an assessment of 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 2.3 of the EIAR submitted details the provision of a permanent 110kV on-site electrical substation and a 110 kV underground cable from the on-site 110kV substation to the existing ESBN Srananagh Substation in the townland of Ballysumaghan, Co. Sligo, approximately 32 km in length, of which 30.6 km will be in the public road corridor. It is outlined that the proposed grid infrastructure will remain as a permanent part of the national infrastructure, which will be operated by the Transmission System Operator, EirGrid and owned by ESB, the Transmission System Owner.

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. 32km grid connection cable routing are identified in Section 2.5.8 of the EIAR submitted in support of the application and represented in Chapter 2 Figure 2-2 running between the proposed on-site Substation and the Srananagh 220kV substation.

Within the 32km of grid connection cable routing, a short section is proposed in the N16, national road. No joint bays are proposed in the national road and no TII Structures appear impacted. Drawing reference 05773-DR-114 included in Appendix 2-2 'Substation and Grid Connection Drawings' refers.

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.

While TII notes a number of standard construction detail drawings and specifications, for example, as included in Appendix 2-2 'Substation and Grid Connection Drawings', TII considers that clarification in relation to the approach outlined in the EIAR is required in the context of 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.

To address the 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 Commissions consideration in relation to grid connection routing proposals;

Proposed Condition;

> *'Crossings of all national road structures 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 6.5 of the Northern and Western Regional Assembly Regional Spatial and Economic Strategy and Development Plan Policy TRAN POL 1 of the Leitrim County Development Plan, 2023 – 2029'.***

In summary, 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.

Finally, there is a finite road space available to accommodate all utilities in the road network, TII recommends that a co-ordinated approach to grid connection routing in this area is achieved to avoid risk to the effective delivery of renewable energy projects in the area and to safeguard the strategic function and levels of safety on the national road network.

2.4 Greenways

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

Conclusion

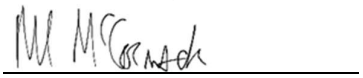
It is requested that the above matters are taken into consideration prior to any decision on the subject application.

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,



Michael McCormack
Senior Land Use Planner