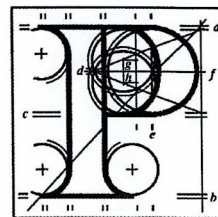


**Our Case Number: ABP-310798-21**



**An  
Bord  
Pleanála**

Transport Infrastructure Ireland  
Parkgate Business Centre  
Parkgate Street  
Dublin 8  
D08 DK10

**Date:** 8th September 2021

**Re:** Proposed development of that portion of an electricity transmission interconnector (Celtic Interconnector) to be constructed onshore in Ireland to the mean high water mark, including a connection to the Irish National Grid, an electricity converter station and all associated and ancillary works.

Townlands of Ballynanelagh, Ballyadam and other various townlands, County Cork.

Dear Sir / Madam,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of Cork County Council and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime, please contact the undersigned officer of the Board.

Tel  
Glao Áitiúil  
Facs  
Láithreán Gréasáin  
Ríomhphost

Tel  
LoCall  
Fax  
Website  
Email

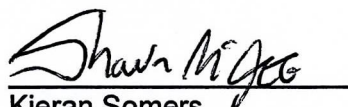
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64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Kieran Somers  
Executive Officer  
Direct Line: 01-8737250

VA11

**Tell**  
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The Secretary  
An Bord Pleanála  
64 Marlborough St.  
Dublin 1

by e.mail; sids@pleanala.ie

<b>AN BORD PLEANÁLA</b>	
06 SEP 2021	
LTR DATED _____	FROM _____
LDG- _____	
ABP- <u>310798-21</u>	

Dáta | Date  
6 September, 2021

Ár dTag | Our Ref.  
TII21-113923

**Re. Strategic Infrastructure Development – Proposed development of that portion of an electricity transmission interconnector (Celtic Interconnector) to be constructed onshore in Ireland to the mean high water mark, including a connection to the Irish National Grid, an electricity converter station and all associated and ancillary works in the townlands of Ballynanelagh, Ballyadam and other various townlands, County Cork**

**ABP Case ref. VA04.310798**

Dear Secretary,

Transport Infrastructure Ireland (TII) confirms receipt of referral of the above proposed Celtic Interconnector Scheme on behalf of Eirgrid. TII acknowledges that the proposed scheme is a key element of Government objectives to transform the electricity system and to assist in delivering necessary resilience in the electricity transmission system in Ireland.

As such, TII supports the objectives of the scheme and recognises the rationale for the proposed accommodation of the Interconnector Cable on a section of the national primary N25 between Youghal and Middleton. TII acknowledges the commitment and engagement of Eirgrid during the development of the Interconnector scheme in addressing questions and concerns raised by TII regarding the impact of the installation and long-term placement of the Celtic Interconnector cables within the pavement of the section of the N25, national primary road, between Youghal and Middleton.

The proposed scheme has significant interaction with the existing and planned national road network in the project area. The N25, national primary road, forms part of the EU TEN-T Comprehensive Network and provides important connectivity between the Cork and Waterford Metropolitan Areas and strategic international access via Ringaskiddy (Cork), Belview (Waterford) and Rosslare (Wexford) ports. The route is therefore considered to have critical national significance.

The Board will be aware that in accordance with the National Planning Framework (NPF) National Strategic Outcome no. 2 'Enhanced Regional Accessibility', there is a requirement to maintain the strategic capacity and safety of the national road network, including planning for future capacity enhancements. This requirement is further reflected in the National Development Plan (NDP), the recent publication of the Draft National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.



Nonetheless, it is inevitable that there will be a degree of adverse impact on the N25, national primary road, during cable installation and henceforth during the long term operation of the road. TII seeks to ensure that such impacts are addressed and mitigated to the greatest extent feasible in order to ensure that Government national and regional transportation objectives can be met.

TII must highlight that there may be substantial construction and operational impacts on the N25, national primary route, which need to be addressed and mitigated in order to give full effect to Government objectives.

Therefore, and having regard to the foregoing, the Authority's objectives in responding to this strategic electricity development application seek to ensure that the provisions of official policy and Government objectives as they relate to the existing and planned national road network are upheld to ensure continuing high standards of safety for road users and to protect the investment being made by Government in the development of the network of national roads.

Eirgrid has consulted extensively with TII in relation to its proposals for the Celtic Interconnector and its impact on the N25, national primary route. More broadly, TII and Eirgrid have engaged at a national level, and continue to do so, in order to ensure the development of electricity infrastructure development occurs in a manner that avoids impacting negatively on the strategic capacity and safety of the national road network, including planning for future capacity enhancements, giving effect to Government objectives related to both national roads and electricity infrastructure.

For example, 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.

TII welcomes that the proposed cable routing from a location east of Midleton to the Knockraha substation is facilitated on the non-national road network, thus avoiding critically impacting NDP proposals for the upgrade of the sub-standard dual carriageway between Midleton and Carrigtwohill.

TII acknowledges that many of the issues that are of concern to TII are of a technical or engineering nature that cannot be fully identified and resolved ahead of the detailed design process. Therefore, TII would welcome consideration by the Board of the application of appropriate conditions, where such an approach is considered acceptable to the Board, in the event that the Board approves the proposed electricity development application.

TII proposes to address the subject proposal under the following headings:

- **Construction Impacts,**
- **Impacts on Bridges and Drainage Structures,**
- **Constraints to Future Development of the N25, national road, and**
- **Application of Official Policy**

#### **1. Construction Impacts**

As indicated above, the N25, national primary road, is part of the EU TEN-T Comprehensive Network. This is a high level EU designation reflecting the important inter-regional connectivity provided by the national road. 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.

Proposals to lay cable and construct joint bays in the national road reservation, such as that outlined in the subject application, have the potential to impact the road authority and TII capacity to undertake future maintenance and improvement requirements to satisfy EU TEN-T Regulations. 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.

The documentation submitted in support of the application indicates that interconnector cables are proposed to be accommodated along the hard shoulder, in the national road reservation of the N25, national road, in the section of cable routing proposed between east of Midleton and west of Youghal.

- a) As outlined above, the N25, national primary road, is a route of critical national significance. Along the affected sections where cable routing is proposed, traffic management and specified working width requirements are such that the works area for the proposed cable installation is likely to impinge on the adjacent running carriageway of the N25, national primary road.

TII would request that insofar as is feasible within existing road width constraints, Eirgrid and their contractors would endeavour to ensure two-way movement of traffic during the cable installation works, recognising that this may not always be possible especially at locations where cable joining bays are to be installed. Traffic management proposals should be agreed between Eirgrid and Cork County Council as road authority, in liaison with TII.

In this regard, Volume 3C Part 2, Section 11 of the EIAR identifies the intention to install cables in the existing road verge. TII requests that at detailed design stage Eirgrid and their designers engage with Cork County Council in liaison with TII on the design of the cable installation within the overall road reservation, with a view to minimising both the construction impacts and the long term impact on the national road. TII would welcome this matter being addressed as a condition of any permission granted.

- b) The construction of cable joint bays is likely to prove significantly more intrusive than the installation of cable, both in terms of construction traffic management and potential long term impact on the integrity of the pavement.

The construction requirements of the cable joint bays may be such as to preclude the accommodation of two way traffic. Moreover, the footprint of the joint bays is likely to extend beyond the hard shoulder and into the trafficked carriageway, impacting on the wheel track. This is likely to lead to a greater risk of early pavement failure at such locations.

TII again requests that at detailed design stage Eirgrid and their designers engage with the road authority, Cork County Council, in liaison with TII with a view to minimising both the impacts of the cable joint bays during construction and the means of dealing with long term impacts on the integrity of the road pavement, at cable joint bays and other locations where the cable or associated infrastructure impinges on the trafficked carriageway. TII would welcome this matter being addressed as a condition of any permission granted.

## **2. Impacts on Bridges and Drainage Structures**

TII recognises that it is not possible to consider detailed proposals for addressing impacts on bridge structures, culverts and drainage at the planning stage of the proposed development. However, it is inevitable that challenges will arise in relation to the likely conflict of the cable trench with bridges and other structures carrying the N25 national road. TII looks forward to detailed engagement with Eirgrid and their designers during the detailed design process in order to protect the structural integrity of the structures.

- a) TII would note to the Board that there are Agreement and Technical Acceptance requirements relating to the assessment, alteration, modification, strengthening and repair of all existing road structures (national roads). Agreement and formal Technical Assessment requirements of TII Publications DN-STR-03001 -



Technical Acceptance of Road Structures on Motorways and Other National Roads - shall be agreed with the Bridge Management Section of TII.

In addition to bridges, transverse drainage culverts of greater than 1.5m span will fall within the requirements of DN-STR-03001.

TII requests that Eirgrid's designers liaise with TII and its Regional Bridge Manager in developing the detailed proposals for the crossing of all bridge and culvert structures by the proposed cable trench in accordance with the requirements of TII Publications DN-STR-03001.

Transverse drainage pipes may also not have sufficient cover to accommodate the full depth of the cable trench. Although no formal approvals process, as in TII Publications DN-STR-03001, exists for drainage structures less than 1.5m in span, TII requests that Eirgrid's designers liaise with the staff in Cork County Council National Roads Office, in liaison with TII, during detailed design and construction stage in order to address any conflicts that may arise.

Where longitudinal french drains coincide with cable joint bays, a reinstatement and re-routing of the longitudinal drainage will be required.

TII would welcome the above matters being addressed as a condition of any permission granted.

- b) Section 11.4.4 of the EIAR identifies the need for the accommodation of abnormal vehicles for the delivery of major construction components to the landfall site and at Knockraha.

A number of the bridge structures on the N25, national road, are not designed to modern engineering standards and will need to be assessed to determine if they have sufficient load carrying capacity to accommodate these abnormal loads. TII requests that Eirgrid and their designers engage with the road authority Cork County Council in liaison with TII at an early stage of the detailed design process in order to identify any such locations.

- c) In relation to substation component delivery haul routes or delivery of other components that may represent abnormal loads, any operator transporting 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 road authority through whose jurisdiction the vehicle shall travel. In the case of all structures on the proposed haul route Eirgrid and their designers should liaise with Cork County Council, as road authority, in liaison with TII, and to ascertain the checking/assessment requirements necessary to confirm the structures capacity to accommodate any abnormal load proposed.

In the eventuality that the proposed haul road extends outside the jurisdiction of Cork County Council into the jurisdiction of other road authorities, consultation with all relevant local road authorities will be required.

The national road network is managed by a combination of PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) as well as local road authorities in association with TII.

In the event of an abnormal load route coinciding with a section of national road under PPP or MMaRC operation, Eirgrid and their designers should also consult with the relevant PPP Company, or MMaRC Contractors, as well as the relevant road authorities in liaison with TII.

Accordingly, TII requests that for all proposed abnormal vehicle movements Eirgrid and their designers liaise with all affected local authorities, in liaison with TII, to ensure appropriate consents, approvals and third party protocols are adhered to in the interests of safeguarding the strategic function and safety of the national road network in the area.

- d) The EIAR at various points addresses the existence of karst geology in the subject area. Associated with such karst conditions has been a history of groundwater derived flooding along sections on the N25,



national road, in this area. In January, 2016, the N25, national road, between Castlemartyr and Killeagh at Clasharinka was closed for a number of weeks due to severe flooding following a period of intense rainfall. It is TII's understanding that Cork County Council are evaluating an improvement scheme that would prevent a recurrence, involving the raising of the road in the vicinity of this flooding.

It is TII's understanding that any raising of the road above an already installed high voltage cable would lead to a reduction in transmission capacity for such a cable. Accordingly, in order to avoid any future de-rating of the Interconnector capacity, it would be necessary to ensure that any works involving a change in road level ought to be implemented in advance of, or in tandem with the Interconnector installation. TII requests that consideration of this matter by Eirgrid, their designers, Cork County Council and TII should be undertaken during the detailed design phase of the Interconnector Scheme. TII would welcome this requirement being addressed as a condition of any permission granted.

### **3. Constraints to Future Development of the N25, national road**

As outlined above, the N25, national primary road, links Cork City with the port of Rosslare and major intermediate cities and towns including Waterford City, New Ross, Dungarvan, Youghal and Midleton. It is a European designated TEN-T route and is a critical piece of road infrastructure along the south coast of Ireland.

While sections of the route have been subject to major improvements in recent times, including the Waterford City and New Ross By-passes, many sections of the route, including the section between Youghal and Midleton have not been subject to such improvement.

The Board will be aware that the NDP includes a national road investment objective related to the N25 Carrigtwohill to Midleton Scheme which is identified as a scheme at pre-appraisal/early planning. In addition, the Cork County Development Plan, 2014, identifies the N25 Carrigtwohill to Midleton to Youghal as a major project.

The NPF identifies the requirement to enhance regional connectivity through improved average journey times by road as a key future growth enabler for Cork. Similarly, a key future growth enabler for Waterford is identified as enhanced regional connectivity through improved average journey times by road to Cork, Limerick and ports within the region.

Such objectives have implications for the improvement of the existing N25, national road, which should be taken into consideration in any decision relating to the subject application.

In that regard, the EIAR and accompanying drawings identify the proposal to route the Interconnector cable around the villages of Killeagh and Castlemartyr. TII supports this design decision.

While Cork County Council and TII have long term plans for by-passing the two villages, the proposed bypasses are not identified in the National Development Plan, 2018 – 2027, and cannot be progressed in the timelines envisaged for the Interconnector project.

The presence of the Interconnector cable on the N25 will significantly increase the challenge of constructing a tie-in to any future by-pass of the villages and may bring significant attendant costs for the proposed bypass schemes.

To resolve such challenges for future road improvements to the EU TEN-T Route N25, national road, TII requests that Eirgrid and their designers engage with Cork County Council and TII with a view to developing a cable installation methodology that would facilitate the future construction of by-pass tie-ins at Killeagh and Castlemartyr. TII would welcome this requirement being addressed as a condition of any permission granted.

### **4. Application of Official Policy**

Section 2.5 of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) states in relation to lands adjoining national roads outside urban centres subject to a 50 – 60kph reduced speed limit that the policy of the planning authority will be to avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads.



TII observes that access to the proposed converter station at Ballyadam appears to rely on access to a private road prior to access to the N25, national road, at a location where the Authority's records indicate a 100kph speed limit applies. TII recommends that access proposals to the proposed converter station are considered in the context of the aforementioned official policy. Similarly, access to proposed temporary construction compounds should be reviewed where there may be implications for the strategic national road network in the interests of the application of official policy and road user safety.

In the interests of road user safety, all works to the national road shall comply with TII Publications (formerly NRA DMRB); technical design standards for national roads.

#### **Conclusion**


As outlined above, TII is cognisant of the strategic national importance of the proposed Celtic Interconnector scheme and is supportive of Eirgrid's and Government objectives in this matter. In accordance with Government policy, TII considers that, in accommodating the Interconnector along part of the N25, there is a parallel critical requirement to ensure the strategic capacity and safety of the existing N25, national primary road, is maintained and the significant Government investment already made in the national road network is safeguarded.

In the foregoing submission, TII seeks to identify mechanisms to ensure that the proposed development can proceed complementary to safeguarding the strategic function, safety and continued efficient operation of the N25, national road, including planning for future national road improvements in accordance with Government objectives.

TII considers that the issues identified in the above comments can be addressed through engagement between Eirgrid, Cork County Council, as road authority, and TII. Therefore, TII respectfully requests the application of appropriate conditions, as identified above, in any decision to approve the subject application.

The Authority trusts that the foregoing comments prove of assistance to the Board in dealing with this matter.

Yours sincerely,



**Michael McCormack**

Senior Land Use Planner