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An Bord Pleanála 64 Marlborough Street Dublin 1 D01 V902

25 April 2025

Our Ref: SEV001SSFI Your Ref: ABP-321238-24

Dear Sir/Madam,

Re: Planning application for a 110 kilovolt electricity substation, approximately 7.5 kilometres of underground electricity line and all associated works at Moyvannan, Feamore, Lisbaun, Carrownolan, Carrowncloghan, Carrowkeeny, Ardmullan, Curraghboy, Gortnasythe, Derryglad, Eskerbaun, and Brideswell, County Roscommon.

We refer to your notice dated 28 March 2025 requesting a response to the matters raised in submissions made in relation to the abovementioned Strategic Infrastructure Development (SID) planning application.

The electricity substation and electricity line (referred to hereafter as 'the proposed development') comprises electrical and ancillary infrastructure to facilitate the export of renewable electricity to the national grid from the extant permitted Seven Hills Wind Farm which was granted planning permission by An Bord Pleanála ('the Board') on 23 November 2023 (Reference ABP-313750-22).

In this regard, it is noted that a significant number of the third party observations received by the Board from members of the public raise matters which relate, in large part, to the permitted Seven Hills Wind Farm and not to the subject proposed development, and therefore effectively amount to a rerun of the arguments raised in that wind farm planning application. These are issues which are now not relevant for the purposes of this instant planning application and, in these cases, a response has not been provided.

Notwithstanding the above, on behalf Energia Renewables ROI Limited ('the Applicant'), we have carefully examined each of the observations received, identified what we consider are the matters relevant to this planning application; including, where appropriate, a cumulative assessment with the permitted Seven Hills Wind Farm; and set out our detailed responses in turn below. It is further noted that there is a degree of repetition between the issues raised in the submissions and observations. Therefore, in the interests of avoiding unnecessary repetition, where an issue has been previously raised and the Applicant has already provided a full response, a cross-reference to that response is provided in lieu of repeating the full response.

1.0 ROSCOMMON COUNTY COUNCIL

Firstly, the Applicant welcomes the overarching conclusion of Roscommon County



Council that "the proposed development is acceptable in principle and at a strategic level accords with relevant national, regional and local planning policy." The Applicant further welcomes the acknowledgement that the proposed development, cumulatively with the permitted Seven Hills Wind Farm, will make a substantial contribution to the achievement of renewable energy generation and greenhouse gas abatement targets.

A response to specific matters raised by the Planning Authority is provided below.

The Planning Authority expresses concern as to the long term effect which the proposed development may have on the local road network and considers that the proposed development may place significant constraints on it with regards to future works along the route of the underground electricity line.

In the first instance, the Applicant notes that the Planning Authority has not provided any specific examples of the purported long term effect or significant constraints which the proposed development will have on the local road network and that these concerns appear to be generic in nature.

Following the installation of the proposed underground electricity line, the excavated trench will be backfilled with appropriate material in accordance with the specification and requirements of EirGrid/ESB Networks and, where installed within the paved carriageways of public roads, reinstated and finished in accordance with the requirements of the Planning Authority (refer to Section 3.4.4 of Chapter 3 (Volume I) of the Environmental Impact Assessment Report [EIAR] submitted). The Applicant has further committed to the full carriageway (i.e. full road width) reinstatement of all public roads within which the underground electricity line is to be installed. The Applicant submits, therefore, that, following the completion of all road reinstatement works which will be completed to the satisfaction of the Planning Authority, the proposed development will not have an adverse long term effect on the local road network.

With regards to constraints which the proposed development may place on future works; it is important to highlight that the installation of underground electricity lines within the public road corridor is commonplace throughout Ireland including in respect of connecting renewable energy developments to the national electricity network. The Applicant acknowledges that the requirement to adhere to separation distances between electricity cables and other services (e.g. water, wastewater, gas, etc.) may place localised constraints on any such future infrastructure along the proposed route; however, the Applicant is currently unaware of any proposals for such the Applicant is currently unaware of any proposals for such installed along the route. Furthermore, given the width of the existing road corridors along the route of the proposed underground electricity line, the Applicant submits that the required separation distances are achievable and that the proposed development will not preclude future development along the proposed route.

It is acknowledged that, due to their size, joint bays represent a constraint to such future infrastructure; however, as set out at Chapter 3 of the EIAR (Section 3.4.4, Volume I), joint bays will, insofar as possible, be located within the roadside verge or at agricultural access points to minimise their impact on the public road carriageway.

Finally, in the event that any future works dictate that the alignment of the underground electricity line must be altered, provision for same could be agreed between the Planning Authority and the operator in charge of the electricity line at



that time.

The Planning Authority refers to a recommendation that the electricity line would be located a minimum of 1.2 metres from the road edge and notes that the recommendation has not been incorporated within the proposed development.

During the design process for the proposed development, the Applicant engaged with the Planning Authority (Roads Authority) to discuss the characteristics and scope of the proposed development and to understand any specific matters which the Applicant should be aware of or should consider in its assessment of the proposed development. A consultation meeting was held with the Planning Authority on 27 June 2024 during which the scope of the proposed development was described in detail and, subsequently, a number of matters were discussed including public road reinstatement requirements, the positioning of joint bays, the depths of electrical and communications ducting and the proposed treatment of encountered structures/culverts. The Applicant committed to review the comments of the Planning Authority and to revise the design of the proposed development, insofar as practicable, to reflect the matters raised.

During the discussion, the Planning Authority referred to its preference that joint bays would be located off-road and the Applicant committed to revise the design, where possible, to adhere to this request and to place joint bays within the roadside verge or at agricultural access points (refer to Section 3.4.4 of Chapter 3 (Volume I) of the EIAR). However, the Planning Authority did not refer to its preference that the underground electricity line would be located a minimum of 1.2m from the edge of the paved carriageway.

In subsequent written (email) correspondence between the Applicant and the Planning Authority, the Applicant provided a set of revised drawings which reflected revised design details incorporating, insofar as possible, the comments of the Planning Authority as discussed on 27 June 2024. Once again, further correspondence received from the Planning Authority did not refer to its preference that the underground electricity line would be located a minimum of 1.2m from the road edge.

Notwithstanding the absence of any express request for a 1.2m separation distance to be implemented, the design process has, at all times, sought to minimise the extent of infrastructure to be installed within the paved surface of the relevant public roads. As is standard practice for the design of such proposed developments, every effort has been made to install infrastructure within the roadside verge to minimise excavations within the road surface, to minimise the effects on traffic flows and manage traffic via 'Stop/Go' systems as opposed to the requirement for full road closures.

In the case of the proposed development, however, the design team identified that, due to the absence of roadside verges or limited roadside verges, it would not be possible to install the entirety of the proposed development 'off-road' (i.e. outside of the paved carriageways) and that installation within the paved surface would be most appropriate in this instance. As part of this process, the design team undertook detailed surveys of the proposed route to identify the presence of any constraints or existing infrastructure within the road structure which would preclude the installation of the underground electricity line. No such constraints were identified and the design team concluded that, subject to appropriate road reinstatement, the underground electricity line within the paved surface without resulting in



significant adverse effects on the public road network. While there is limited opportunity to install infrastructure within roadside verges, the Applicant is committed to maximising the extent of infrastructure which can be located within roadside verges to minimise, to the greatest possible degree, disruption to the existing road structure.

Following a further design review of the proposed development in light of the comments of the Planning Authority, due to the absence or restricted availability of roadside verge, it will not be possible to maintain a separation distance of 1.2m from the road edge to the underground electricity line.

While noting the Planning Authority's "preference" for a 1.2m separation distance, the Applicant submits that the Planning Authority has not identified any likelihood of significant adverse effects on the public road network, or on transport and access, in the event that the 1.2m separation distance cannot be achieved. As discussed above, the Applicant submits that the presence of the underground electricity line within the paved surface of the public road network or within immediately adjacent roadside verges will not, subject to appropriate reinstatement of the electricity line trench and re-surfacing of the affected carriageways, pose any long-term risk to the operation of the public road network.

Accordingly, the Applicant submits that the Planning Authority's preference for a 1.2m separation distance between the paved carriageway and the electricity line is unwarranted. Notwithstanding this, the Applicant is committed to ongoing consultation with the Planning Authority during the post-consent detailed design process and the road opening licence application process as to the precise alignment and siting of infrastructure to ensure that all matters are satisfactorily addressed and that the proposed development does not result in any likely significant effects on the public road network.

Strictly without prejudice to the above, the Applicant notes the comments of the Planning Authority in its submission on the permitted Seven Hills Wind Farm wherein it was similarly requested that electricity cables associated with that development would be located a minimum of 1.2m from the road edge. In that case, the Applicant similarly noted that roadside verges were insufficient to comply with the preference of the Planning Authority but that the Applicant was committed to ongoing consultation regarding the siting of grid connection infrastructure during the post-consent detailed design process. The Board's Inspector, in carrying out her assessment of the now-permitted development, concluded that having "considered all the written submissions made in relation to movement and access...I am satisfied that...no significant adverse effect is likely to arise" and made no specific comment as to the requested separation distance. The Board subsequently granted planning permission and did not identify a risk of likely significant effects arising from the development, including from the alignment of the grid connection infrastructure.

Given the assessments undertaken in respect of the subject proposed development, the Applicant similarly submits that there is no evidence basis for the requested separation distance, given that no significant effects on the road network have been assessed as likely.

The Planning Authority refers to the limited extent of the planning unit boundary (assumed to refer to the planning application boundary) and questions the ability of the project to adhere to the boundary.



The proposed development has been subject to a comprehensive planning-stage technical design process and environmental constraints analysis to assess the suitability of the route of the underground electricity line and to confirm that the proposed development can be constructed as proposed.

Along the route of the underground electricity line, the planning application boundary generally adheres to the public road corridor which is largely defined by roadside hedgerows. Given the design characteristics of the underground electricity line, ancillary structures and the width of the public road corridor, the Applicant can confirm that the proposed development can be fully constructed within the planning application boundary.

The Planning Authority advises that, in the event that the electricity line is to be installed within the carriageway of the public road network, full lane reinstatement will be required.

As set out at Section 3.4.4 of Chapter 3 (Volume I) of the EIAR, the Applicant has committed to the full-carriageway (i.e. full road width) reinstatement of all public roads within which the underground electricity line is installed. All road reinstatement works will be completed to the highest standards to the satisfaction of the Planning Authority such that the proposed development will not have a long term adverse effect on the public road network.

The Planning Authority submits that the proposed development will inevitably result in the requirement for ongoing public road carriageway maintenance and requests that the Applicant be required to provide an annual maintenance contribution of €2,000 per kilometre of affected public road.

The Applicant does not understand any basis for or agree with the Planning Authority in its statement that the proposed development will "*inevitably*" result in ongoing public road carriageway maintenance and the Planning Authority has not provided any evidence to substantiate this assertion. As described above, the excavated trench will be backfilled in accordance with required standards followed by full road width reinstatement of the affected roads. All reinstatement works will be completed to the satisfaction of the Planning Authority.

Furthermore, the Planning Authority has provided no evidence to support the request that an annual maintenance contribution of €2,000 per kilometre should be payable by the Applicant. Additionally, the Planning Authority has not provided any supporting calculations to demonstrate how the sum of €2,000 was determined. Notwithstanding this; given the reinstatement proposals set out above, the Applicant submits that the public roads in question are not likely to require maintenance works in the short-to-medium term and that any future works which may be required will be unrelated to the proposed development. Therefore, the Applicant submits that the annual payment of €2,000 per kilometre is entirely unwarranted and unreasonable.

The Planning Authority asserts that the installation of joint bays will have a major impact on the public roads and that locations and depths of joint bays can only be approved following further consultation.

As described at Section 3.4.4 of Chapter 3 (Volume I) of the EIAR, the precise number of joint bays will be confirmed as part of the post-consent detailed design process. This detailed design process will also confirm the precise location of the joint bays within the public road corridor; however, as set out at Section 3.4.4 of Chapter 3



(Volume I) of the EIAR and discussed at length above, joint bays will be located within roadside verges or agricultural access points insofar as practicable to minimise the extent of joint bay infrastructure located within the paved carriageways.

As set out above, the planning-stage design process undertaken to date has confirmed that the route of the underground electricity line is capable of accommodating the proposed development, while the post-consent detailed design process will confirm the precise siting of infrastructure within the public road corridor.

As requested by the Planning Authority, the Applicant is committed to engaging and consulting with it to ensure that all matters and any concerns are fully addressed and to ensure that effects on the public road network are avoided, through appropriate design and siting of the joint bays, to the greatest possible extent.

The Planning Authority requests that, should planning permission be granted, the Applicant engage with it regarding surveys of the public road including the detailing of available roadside verge.

The Applicant is committed to ongoing engagement with the Planning Authority as part of the post-consent detailed design process. As part of the design process, further site investigations; including site surveys; will be undertaken which will inform the precise alignment of the underground electricity line and the precise siting and depth of joint bays.

The Planning Authority advises that, in the event that the electricity line is to be installed within the carriageway of the public road network, reinstatement of the trench shall be undertaken in accordance with Guidelines for the Opening, Backfilling and Reinstatement of Trenches in Public Roads.

The Applicant can confirm that all public road reinstatement works will be undertaken in accordance with the Guidelines for the Opening, Backfilling and Reinstatement of Trenches in Public Roads (April 2017) and shall be completed to the satisfaction of the Planning Authority.

The Planning Authority requests that details of the permanent reinstatement of public roads be appropriately illustrated on mapping and provided to it for agreement.

The Applicant can confirm that, as part of the post-consent detailed design process, public road reinstatement details shall be appropriately illustrated on mapping and provided to the Planning Authority for agreement.

The Planning Authority advises that a road opening licence will be required for all works located within the public road.

The Applicant acknowledges that a road opening licence will be required for the proposed development and can confirm that all necessary consents and licences shall be in place prior to the commencement of construction.

The Planning Authority requests that further consultation is undertaken prior to the submission of revised proposals.

As set out above, the Applicant is committed to ongoing consultation and engagement with the Planning Authority throughout the post-consent detailed design process.

The Planning Authority asserts that should the proposed development require

Moyvannan Electricity Substation



relocation to accommodate future road development works, the full costs of such relocation shall be borne by the statutory undertaker in charge of the infrastructure.

The Applicant acknowledges that, in the event that the proposed development is required to be relocated in the future arising from potential road development works, the costs of same shall be borne by the statutory undertaker in charge of the infrastructure at that time.

The Planning Authority proceeds to set out a number of requests in relation to the provision of a Construction Management Plan; the provision of key personnel contact details; the appointment of an engineer to liaise with it; consultation with emergency services and transport service providers; and consultation with members of the public and elected representatives.

The Applicant acknowledges the requests of the Planning Authority and can confirm that each will be adhered to in full. In particular:-

- 1) A Construction Management Plan shall be prepared and agreed in writing with the Planning Authority;
- 2) Details of the Project Supervisor for the Design Process (PSDP), Project Supervisor Construction Stage (PSCS) and involved contractors shall be provided to the Planning Authority;
- 3) All necessary insurances and performance bonds shall be put in place;
- 4) An engineer shall be appointed to manage consultations with the Planning Authority;
- 5) Consultation will be undertaken with An Garda Síochana, emergency services and public transport operators in the area; and,
- 6) A Community Liaison Officer will be appointed to coordinate consultation with *inter alia* the public, local residents, business owners, schools and elected officials.

The Planning Authority sets out a wide range of conditions including in respect of the provision of electricity line installation details prior to construction; road closure applications; implementation of temporary speed limits; maintenance of diversionary routes; provision of Traffic Management Plans; the completion of pre-construction surveys; adherence to transport Infrastructure Ireland guidance; road reinstatement and treatment of ironworks; detailed proposals for watercourse crossings; and surveying and redesign (if required) of existing water drainage features.

The Applicant acknowledges the requests of the Planning Authority and can confirm that:-

- Details of cable installation will be provided to the Planning Authority prior to the commencement of construction. It should be noted that, as committed to above, the Planning Authority will be engaged continuously throughout the post-consent detailed design process;
- 2) Road closure licences will be applied for a minimum of 8-weeks prior to the closure period;
- 3) Requests for temporary road work speed limits will be submitted to the Planning Authority a minimum of 8-weeks in advance and all signage will be installed and maintained by the Applicant;



- 4) Diversionary routes shall be maintained by the Applicant;
- 5) Traffic Management Plans will be prepared and submitted to the Planning Authority;
- 6) A pre-condition survey of the route of the underground electricity line and adjoining private entrances and boundary structures shall be undertaken and a copy provided to the Planning Authority. Any damage arising, which is directly attributable to the proposed development, shall be put right to the satisfaction of the Planning Authority and/or private landowner, as applicable, and the cost of same shall be borne by the Applicant;
- 7) Where necessary, pre-construction structural surveys of adjoining properties shall be undertaken;
- 8) All works shall be undertaken in accordance with Transport Infrastructure **Ireland's** Specification for Road Works unless otherwise specified and agreed with the Planning Authority;
- 9) All public road reinstatement works will be undertaken in accordance with the Guidelines for the Opening, Backfilling and Reinstatement of Trenches in Public Roads (April 2017) and shall be completed to the satisfaction of the Planning Authority;
- 10) All public roads within which the underground electricity line is installed will be subject to a full-carriageway (i.e. full road width) reinstatement and all reinstatement proposals shall be agreed with the Planning Authority;
- 11) All ironworks, road marking and road studs shall be reinstated to their original condition;
- 12) As part of the detailed design process, full details will be provided relating to any interactions with existing services and watercourse crossings;
- 13) In the event that any existing drainage features are affected, proposals for the management of surface waters shall be agreed with the Planning Authority;
- 14) The Applicant is agreeable to the implementation of a 2-year defects liability period.

2.0 DEVELOPMENT APPLICATIONS UNIT

The Development Applications Unit (DAU) sets out a suggested condition of consent regarding the implementation of archaeological and cultural heritage mitigation measures, the monitoring of groundworks, the preparation of a Construction Environmental Management Plan and the furnishing of archaeological monitoring reports to the Department and Planning Authority.

The Applicant acknowledges the comments of the DAU and would welcome a condition of consent reflecting the requests as set out in the observation. With particular reference to the comments of the DAU, it should be noted that:-

- 1) All mitigation measures set out at Chapter 10 (Volume I) of the EIAR shall be implemented in full;
- 2) Section 10.6.1 of Chapter 10 (Volume I) of the EIAR provides for the monitoring, under licence, of excavation associate with the proposed development;



- 3) A Planning-Stage Construction Environmental Management Plan has been prepared and the Applicant has committed to the preparation of a detailed plan prior to the commencement of development;
- 4) The Applicant can confirm that a report of the archaeological monitoring results will be furnished to the Planning Authority and the Department of Housing, Local Government and Heritage ('the Department').

The DAU refers to concerns regarding potential impacts on Whooper Swan flight lines that may intersect with the project site.

Currently, the Athlone-Lanesborough 110kV overhead transmission line passes through the site of the proposed electricity substation at a height of approximately 16m and is suspended from a number of wooden pole sets. The proposed development does not introduce any additional overhead lines; however 2 no. new interface masts will be installed to enable connection of the overhead line to the proposed electricity substation. It should also be noted that an existing wooden pole set will be decommissioned and replaced by one of the interface masts. Therefore, the proposed development does not introduce any tall infrastructure into a location where none was previously present; nor does it materially increase the height of the Athlone-Lanesborough 110kV overhead electricity line.

Accordingly, the Applicant submits that, regardless of whether bird species; including Whooper Swan; fly over the proposed development site, there is no increased risk of collision when compared to the existing baseline scenario. In this regard, Section 5.3.1.1 of the Natura Impact Statement states that:-

"The substation and electrical apparatus could present collision risk to birds; however, this is highly unlikely. This is because the control building itself will be low in height (c. 8.5 m in height) and solid and static, and so will be easily visible to flying birds.

The interface masts will also be low in height (15 - 18 m in height) and there is an existing overhead transmission line present, with one of the wooden pole sets proposed to be replaced by one of the interface masts. This means there will no new overhead lines constructed. The underground nature of the electricity line will also not pose any collision risk to birds.

Thus, there will be no appreciable increase to the current level of collision risk presented to birds due to the proposed project, and collision risk can be excluded from further assessment." [emphasis added]

While Whooper Swan have been recorded using the turloughs to the south/southwest of the proposed electricity substation; there is no evidence to suggest that the existing overhead line represents a significant risk of collision or a deterrent to the use of the turloughs. Given that there will be no appreciable increase in the risk of collision arising from the proposed development, it is assessed that the proposed development will not have a significant effect on Whooper Swan or any other bird species.

In addition to collision risk, the likely disturbance or displacement effects on avian species arising from the proposed development; including Whooper Swan; have been assessed in full in the EIAR and NIS. Disturbance is assessed as most likely to occur during the construction phase due to increase personnel and site activities creating visual and aural disturbance stimuli. However, a comprehensive set of mitigation measures; including the appropriate timing of works, the management of site



activities and vehicle/staff behaviour, the implementation of acoustic and visual screening barriers, and undertaking bird monitoring; have been proposed to mitigate any likely/potentially significant disturbance/displacement effects on birds overflying the proposed development site. Consequently, it is assessed that the proposed development is not likely to have significant disturbance or displacement effects on any bird species.

It is noted that an application for planning permission¹ has been lodged by EirGrid for the uprating of the Athlone-Lanesborough 110kV transmission line which will involve *inter alia* the replacement/restringing of the overhead electricity line and the replacement of wooden pole sets. However, the proposed uprating and replacement of pole sets will not result in a material increase in the overall height of the transmission line within the subject proposed development site, with the height of the transmission line proposed to remain at approximately 16m. Therefore, it is assessed that there will be no cumulative effect on Whooper Swan flight paths or cumulative increase in collision risk as a consequence of the proposed development and the proposed uprating of the overhead transmission line.

The DAU refers to the fact that dawn/dusk movements of birds may occur within the site but that the majority of surveys were conducted during mid-morning and mid-afternoon.

As the DAU has correctly identified, the majority of bird surveys were undertaken during the hours of daylight. While flights of Whooper Swan may occur in the vicinity of the proposed development site during the hours of dawn/dusk, the fact that a significant proportion of surveys were not conducted during these hours is not assessed to be a methodological limitation of the assessments carried out in the EIAR or Natura Impact Statement (NIS).

The proposed development is not assessed as giving rise to an appreciable increase in the risk of collision and, therefore, the carrying out of a significant volume of dawn/dusk surveys was not assessed as being required. It is further assessed, on the basis of the experience² and professional judgement of the ecological and ornithological survey team, that the carrying out of dawn/dusk surveys would not yield data or information such that alternative findings would be reached in either the Biodiversity chapter of the EIAR or the NIS.

Accordingly, therefore, the Applicant submits that the conclusions reached in both the EIAR and NIS are robust, wholly supported by evidence obtained in desktop and field surveys and are not in any way undermined by the absence of a substantial volume of dawn/dusk survey data, which are not assessed as being required in this instance.

Notwithstanding the above, and strictly without prejudice to the assessments undertaken in the EIAR and NIS, the Applicant has conducted a number of dawn/dusk surveys since February 2025 in response to the comments raised by the DAU. The findings of these surveys are consistent with those of previous surveys and confirmed the opinion that they were not required; in that there has been no evidence of Whooper Swan overflying the proposed development site; and confirm that the proposed development does not pose a risk, or a significant increase in the risk, of

¹ Roscommon County Council Planning Register Reference 24/60559

 $^{^{\}rm 2}$ As set out at Section 5.1.3 of Chapter 5 (Volume I) of the EIAR and Section 1.4 of the NIS.



collision with the proposed development or existing transmission line by Whooper Swan.

3.0 TRANSPORT INFRASTRUCTURE IRELAND

Transport Infrastructure Ireland (TII) submits that any works to the national road network to facilitate the delivery of abnormal loads shall comply with TII publications and shall be subject to a Road Safety Audit.

Given the characteristics of the proposed development, it is assessed that there will be no abnormally sized or weighted loads delivered to the proposed development site and that no works will be required to the national road network.

In the highly unlikely event that any works to the national road network are required, the Applicant can confirm that any such works will be undertaken strictly in accordance with TII publications and shall be subject to a Road Safety Audit.

TII requests that all proposals agreed to between the Applicant and the Planning Authority which may affect the national road network be referred to it.

As set out above, no works to the national road network are proposed or assessed as being required. In the highly unlikely event that any such works are required, all agreements reached between the Applicant and the Planning Authority shall be referred to TII.

TII requests that any damage caused to the pavement of national roads by the turning movements of abnormal length loads shall be rectified in accordance with TII Standards.

The proposed development will not require the delivery of any abnormal length or weight loads and, accordingly, no damage to the surface of national roads is assessed as likely. In the event that any damage to the surface of national roads is found to be directly attributable to the proposed development, it shall be remediated in accordance with TII standards and at the expense of the Applicant.

While acknowledging that the EIAR indicates that abnormal sized or weight loads are not required, TII advises that, should project details be subsequently altered, permits must be obtained from local authorities where the characteristics of a load fall outside the limits allowed under the Road Traffic (Construction Equipment & Use of Vehicles) Regulations 2003.

The Applicant can confirm that the movement of abnormally sized or weighted loads is not currently required and is not likely to be required in the future.

TII requests that, where the weight of a delivery vehicle and load exceeds the limits set out in the Road Traffic Regulations, all structures should be checked to confirm that they are capable of accommodate the proposed vehicle loading.

As the delivery of abnormal weight loads is not required or predicted, no such assessment of structures is likely to be required. However, in the highly unlikely event that abnormal weight loads are required, all affected structures will be subject to appropriate assessment to confirm their ability to accommodate delivery vehicles and loadings.

4.0 GEARÓID CUNNIFFE & GRÁINNE NÍ MHEACHAIR



Mr. Cunniffe & Ms. Ní Mheachair contends that the EIAR relies on theoretical models in the assessment of flood risk.

As set out at Section 4.1 of Annex 7.2 (Volume II) of the EIAR, the flood risk assessment has been conducted in accordance with *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009) prepared by the Department of Environment, Heritage & Local Government (DoEHLG) and follows the methodologies outlined therein.

The specific methodologies applied and the findings of the assessment are described in full at Annex 7.2 and we refer the Board to same; however, in summary, the assessment finds that the electricity substation and the majority of the underground electricity line is at low risk of fluvial or pluvial and is located in Flood Zone C. While localised areas on the underground electricity line are located within Flood Zones A and B, the appropriate timing of works (i.e. avoidance of works during and after intense rainfall) will ensure that the works are not at risk of flooding.

The assessment concludes that the proposed development is appropriate from a flood risk perspective and the risk of the proposed development contributing to downstream flooding is very low.

The Applicant can confirm that the drainage system to be installed at the electricity substation will be subject to regular maintenance to ensure its efficient operation; particularly in respect of attenuating surface water and ensuring that any surface water arising is returned to the hydrological environment at greenfield rates thus avoiding any risk of downstream flooding.

Mr. Cunniffe & Ms. Ní Mheachair refer to concerns regarding excess water flow being diverted onto their property and the consequential environmental effects of same.

Due to the geological conditions of the proposed development site as identified during site investigations, it is assessed that 70% of rainfall which falls on the proposed development site will recharge to ground. Based on average long-term rainfall data, it is assessed that the proposed development site will have a recharge rate of 414mm per year and a runoff rate of 177mm per year. We refer the Board to Section 7.3.2 of Chapter 7 (Volume I) of the EIAR for further details on recharge and runoff rates.

Accordingly, due to existing ground conditions and the permeable nature of the electricity substation compound and access track, it is assessed that notable volumes of surface water runoff are not likely to arise as a consequence of the proposed development. In order to treat and attenuate any surface water which arises, drainage infrastructure will be installed downgradient of the electricity substation such that any runoff is intercepted, directed through a water treatment train to remove any silt/sediment or other contaminants and then discharged to ground at greenfield rates.

This treatment and attenuation process will ensure that water being discharged from the proposed development site is of an extremely high quality and is returned to the hydrological environment at a rate (including an allowance for climate change) which mimics the current baseline environment. Therefore, the Applicant can confirm that there will be no discharge of excess water directly onto the property of Mr. Cunniffe & Ms. Ní Mheachair and no likely significant environmental effects as a result of the discharge of surface water runoff.

Mr. Cunniffe & Ms. Ní Mheachair submit that the earthworks associated with the



proposed development could alter the natural flow of water, could contribute to surface water runoff and increase the risk of flooding.

Firstly, it is important to note that there are no natural surface water features within the site of the proposed electricity substation or in its immediate environs. The Moyvannan Stream, as mapped by the Environmental Protection Agency (EPA), is the nearest such feature and is located c. 1.8km southeast of the electricity substation. Accordingly, it is assessed that the proposed development will not affect any existing surface water channels or flows.

Furthermore, as described above, the proposed development site, due to its geological characteristics, exhibits a high degree of surface water recharge with 70% of rainfall assessed as recharging directly to ground. Therefore, given the absence of significant volumes of surface water flows, the proposed development is not likely to result in any significant effect on surface water flows. Additionally, due to the shallow depth of excavations associated with the proposed development, no effects on groundwater levels are assessed as likely.

As described above, due to ground conditions and the implementation of a drainage system at the electricity substation, no downstream flooding is assessed as likely.

Mr. Cunniffe & Ms. Ní Mheachair raise concerns relating to increased traffic volumes and the consequential risk of congestion, delays and accidents.

The likely effects arising on transport and access, including increased traffic volumes; have been assessed in full at Section 12.2 of Chapter 12 (Volume I) of the EIAR. Given the characteristics of the proposed development during its construction and operational phases (decommissioning is not proposed), it is assessed that the vast majority of traffic movements will arise during the construction phase. Section 12.2.4.1 of Chapter 12 (Volume I) of the EIAR provides a detailed breakdown and evaluation of construction traffic volumes and it is assessed that a total of 3,714 no. HGV deliveries/trips will be generated by the project as a whole. Over the course of an assumed 18-month construction phase (a 15-18 month construction period is assessed as likely), this amounts to an average daily increase of 9 no. HGVs. Additionally, it is assessed that 15 no. staff vehicles; comprising light-goods vehicles (LGVs) and crew vehicles; will also travel to the proposed development site on a daily basis.

Of the predicted 3,714 no. HGV movements, 1,047 no. are assessed as likely to be attributable to the construction of the electricity substation and would access the electricity substation site via the L7551. Over the course of an assumed 18-month construction phase, this corresponds to an average daily increase of 3 no. HGVs which is assessed to be an imperceptible increase in traffic volumes.

In addition to the construction phase traffic, the L7551 will also accommodate the proposed underground electricity line. Due to the narrow profile of the public road, and as described at Section 12.2.4.1 of Chapter 12, rolling full road closures will be implemented along the L7551 as electricity line installation works progress. Accordingly, due to the increased traffic volumes and the closure of the L7551, it is assessed that there will be some disruption to local road users along the L7551. As set out at Section 12.2.4.1 (Chapter 12), however, effects arising from increased traffic volumes are assessed as likely to be slight and short-term; while effects during the installation of the underground electricity line are assessed as likely to be moderate-slight and short-term in nature. Notably, significant effects are not assessed as likely and the overall classification of effects during the construction phase; accounting for



the cumulative effects of all construction activities; is assessed as ranging from moderate-slight to imperceptible and of a short-term duration.

While significant effects on traffic and transport are not assessed as likely, the Applicant has proposed a set of mitigation measures at Section 12.2.5.1 of Chapter 12 to reduce the magnitude and significance of effects insofar as possible and we refer the Board to same. The principal measure in minimising disruption to local road users is the implementation of a comprehensive Traffic Management Plan (TMP) during construction. It is proposed, as described at Section 3.4.8 (Chapter 3) and Section 12.2.5.1 (Chapter 12) of the EIAR, that the TMP will be agreed with the Planning Authority prior to the commencement of development and will address matters including construction materials delivery routes, a materials delivery programme, **details of 'Stop/Go' systems, signage, road closures**, speed limits, diversionary routes, and road reinstatement details. The TMP, which will be prepared in consultation with the Planning Authority, will provide specific details of construction traffic access routes and delivery schedules and will set out how public traffic flows and local access arrangements will be protected and maintained.

A Planning-Stage TMP has been prepared (Annex 1 hereto) to set out proposals for the management of traffic during the construction of the electricity substation and the installation of the underground electricity line along the L7551. The measures to be implemented, and their precise operation, will be subject to refinement and agreement with the Planning Authority prior to the commencement of development; however, planning-stage details of passing bays, temporary road closures, diversionary routes, 'Stop/Go' systems, and one way systems are provided. The implementation of these measures, which are standard traffic management procedures for such construction activities along public roads, can be readily implemented without resulting in any likely significant effects on local residents, landowners or public road users.

With the implementation of these traffic management measures; which will minimise interactions between construction-generated traffic and public traffic, maintain traffic flows and ensure public (including pedestrian) safety; the Applicant submits that the proposed development is not likely to result in significant congestion or delays or a significant risk of accidents.

Mr. Cunniffe & Ms. Ní Mheachair submit that no details have been provided in relation to alternative routes or turning areas.

As described above, planning-stage details of diversionary routes, one-way systems and indicative passing bay locations have been provided to illustrate the traffic management measures which may be implemented by the Applicant. As set out above, the selected measures and their precise implementation will be described in full within the detailed TMP to be agreed with the Planning Authority prior to the commencement of development. Additionally, detailed traffic management proposals will be required as part of the road closure permitting process which be the subject of approval by the Planning Authority.

With regards turning areas, adequate turning areas have been provided for within the temporary construction compound and no construction vehicles will be permitted to turn within private accesses along the L7551.

Mr. Cunniffe & Ms. Ní Mheachair refer to the absence of passing areas for construction and public traffic.



The Planning-Stage TMP provides for the installation of 5 no. passing bays along the L7551; the precise location and design of which will be agreed with the Planning Authority prior to the commencement of development. The passing bays will comprise a layer of aggregates placed within the roadside verge to enable HGVs and members of the public to safely pass each other and minimising the requirement for vehicles to reverse along the public road. On completion of construction activities, the passing bays shall be removed and the affected areas reinstated to their current condition. The provision of these passing bays will ensure that construction and public traffic can be accommodated along the L7551 and that sufficient passing opportunities are provided. It should be noted that construction traffic and material deliveries will be carefully managed to avoid, insofar as possible and minimise to the greatest possible degree, vehicles meeting along the L7551.

However, as described above and to be agreed with the Planning Authority, it is likely that a one-way system will be implemented along the L7551 for all traffic for the duration of the construction of the electricity substation; with traffic approaching the electricity substation site along the L7551 from the south and, previously, the L7556 and N61. On egressing the electricity substation site, construction traffic will travel in an easterly direction along the L7551 to the N61. With the implementation of this system for construction and public traffic, there will be no requirement for construction and public traffic to pass each other along the L7551; however, the 5 no. passing bays will be installed regardless as a further traffic management measure.

During the installation of the underground electricity line within the L7551, the section of the L7551 to the south of the electricity substation entrance will not be utilised by construction traffic accessing the electricity substation or by public traffic (other than for local access) due to rolling road closures. Instead, traffic accessing and egressing the electricity substation site and public traffic will utilise the L7551 to the east of the electricity substation which leads directly to the N61. During this period, the 3 no. passing bays to be installed along this section of the L7551 will enable construction and public traffic to safely pass thus ensuring that there will be no likely significant effect on traffic flows or public safety.

Mr. Cunniffe & Ms. Ní Mheachair suggest that the proposed development will result in damage and a deterioration of the road surface of the L7551.

As described at Section 12.2.5.1 of Chapter 12 (Volume I) of the EIAR, the Applicant has committed to pre- and post-construction pavement condition surveys of all nonnational routes proposed to be used in the delivery of construction materials. The purpose of the pre-construction surveys is, in the first instance, to identify any works which may be required to ensure the structural integrity of the road network during the construction phase and, secondly, to provide a baseline survey against which the post-construction survey can be compared.

The post-construction survey will be utilised to identify any locations at which the carriageway of the public road network has deteriorated and the locations at which remedial works are required. The Applicant has committed, at Section 12.2.5.1, that any remedial works shall be undertaken at the expense of the Applicant and to the satisfaction of the Planning Authority.

Furthermore, in the event that a deterioration arises during the construction phase such that it poses an immediate risk to public and road safety, remedial works shall be immediately undertaken by the Applicant and to the satisfaction of the Planning



Authority.

Mr. Cunniffe & Ms. Ní Mheachair contend that the proposed development will pose a significant risk to pedestrian safety during the construction and operational phase.

All construction traffic utilising the L7551 will operate strictly in accordance with the requirements of the TMP which, as set out above, will include details of appropriate speed limits. The identification of appropriate speed limits will be agreed with the Planning Authority but it is likely that construction traffic along the L7551 will have a limit of 30 kilometres-per-hour (kph). All construction staff and contractors will, as set out at Section 12.2.5.1 of Chapter 12 (Volume I) of the EIAR, be notified on speed limits during site induction and compliance with the limits will be strictly enforced.

Additionally, where necessary during the installation of the underground electricity line along the L7551 (and all other routes), pedestrians will be escorted through the works area by construction personnel when safe to do so.

Furthermore, excavations within the public road network will not remain open outside of working hours and shall be backfilled or covered with steel plates to ensure that there is no risk to public safety.

During the operational phase, traffic volumes will be substantially reduced and will predominately comprise light-goods vehicles attending the electricity substation on 1-2 no. occasions per week.

The Applicant submits, therefore, that construction and operational phase traffic will be strictly managed such that it will not pose a risk of likely significant effects on road and public safety.

Mr. Cunniffe & Ms. Ní Mheachair refer to the absence of a Traffic Management Plan.

As discussed above, a comprehensive TMP will be prepared prior to the commencement of development and following consultation with the Planning Authority. A Planning-Stage TMP has been prepared and is enclosed at Annex 1 and provides a framework within which the detailed TMP will be prepared and implemented.

Mr. Cunniffe & Ms. Ní Mheachair raise concerns regarding effects on emergency services.

The Planning-Stage TMP; at Section 5 of Annex 1; sets out that traffic management proposals will be prepared in consultation with emergency services. Section 5.4, in particular, states that the appointed contractor will consult with An Garda Siochana, Ambulance and Fire services in the preparation of the TMP.

Appropriate provision will be made to maintain access for emergency services including prior notification of road closures and diversionary routes; while emergency services will be escorted through a works area if required. Accordingly, the Applicant submits that there will be no likely significant effect on emergency services.

Mr. Cunniffe & Ms. Ní Mheachair submit that it would be necessary to undertake significant works to accommodate construction traffic.

As described at Section 12.2 of Chapter 12 (Volume I) of the EIAR, the proposed development will not require the delivery of any abnormal sized or weight loads with construction materials being delivered by standard HGVs. The public road network in the vicinity of the proposed development has been assessed and it is concluded that



no substantial works are required to accommodate construction traffic.

In response to the earlier comments of Mr. Cunniffe & Ms. Ní Mheachair, 5 no. passing bays are proposed to be developed along the L7551 to ensure that construction and public traffic can safely pass each other on the L7551. Otherwise, no works are assessed as being required to accommodate vehicular traffic during the construction or operational phases.

Mr. Cunniffe & Ms. Ní Mheachair refer to health concerns arising from electromagnetic fields (EMF) generated by the electricity substation.

Section 4.5.2.2 of Chapter 4 (Volume I) of the EIAR sets out that the proposed development will operate in strict compliance with the international guidelines set by the International Commission on Non-Ionizing Radiation Protection (ICNRP). Based on the infrastructure to be installed within the electricity substation, it is predicted that EMF levels will be approximately 5-microteslas (μ T) at the electricity substation. This level of EMF is very substantially below the accepted limit of 100 μ T as set out by the ICNRP.

Furthermore, the ESB document *EMF* & You³ refers to the findings of a number of health studies as to the effects of EMF, including by the World Health Organisation and the Irish Government. The studies have consistently found that there is no adverse effect on human health as a result of EMF.

Accordingly, given the separation distance between the electricity substation and Mr. Cunniffe & Ms. Ní Mheachair's residence, significant effects are not assessed as likely.

Mr. Cunniffe & Ms. Ní Mheachair raise concerns regarding impacts on property values.

The EIAR has assessed that the proposed development will not result in significant adverse effects in terms of population or human health, air quality and climate, landscape, noise and vibration, and transport and access. In particular, the project has been designed to minimise the likely effects on residential amenity, including:-

- separation distances between the proposed electricity substation and residential properties have been maximised to reduce the likelihood of significant effects on population and human health and effects arising as a consequence of dust, noise and vibration; and,
- the siting of the electricity substation has been carefully selected to minimise its prominence in the landscape while, in order to reduce its visibility further, landscaping measures have been proposed to screen the substation and assist in its absorption within the landscape.

Therefore, given the absence of any likely significant effects on local residents or residential amenity, the Applicant submits that the proposed development is not likely to result in any an adverse effect on property values.

Mr. Cunniffe & Ms. Ní Mheachair contend that the proposed development could result in the destruction of natural habitats and disruption to the local ecosystem.

The likely effects of the proposed development on Biodiversity have been assessed, in full, at Chapter 5 (Volume I) of the EIAR and we refer the Board to same. In summary,

³ EMF & You (ESB, 2017)



the assessment concludes that significant residual effects are not likely to be experienced by any natural habitats or species.

5.0 ROSE BURKE

Ms. Burke asserts that the planning application is invalid as consent from the ESB to break the existing transmission line has not been provided.

The planning application for the proposed development has been prepared and submitted in accordance with all relevant requirements of the Planning & Development Act 2000 (as amended) ('the Planning Act') and the Planning & Development Regulations 2001 (as amended) ('the Planning Regulations'). Neither the Planning Act nor the Planning Regulations require the consent of the ESB for the purposes of lodging a planning application in accordance with Section 182A of the Planning Act. Accordingly, the Applicant submits that the assertion of Ms. Burke is incorrect.

Subject to a grant of planning permission, the Applicant will engage with EirGrid to ensure that all necessary supplementary licences and consents are in place to enable the proposed development connect to the existing Athlone-Lanesborough 110kV overhead electricity transmission line as per the normal process.

Ms. Burke suggests that the underground electricity line may or may not be a Section 182A application but that the electricity substation and ancillary works are not.

The basis of Ms. Burke's comments on this matter are unclear. However, following preapplication consultations under Reference ABP-319042-24 in respect of the proposed development, the Board determined that the proposed development constitutes a Strategic Infrastructure Development and that a planning application for same must be made directly to it pursuant to Section 182A of the Act and not to the relevant local planning authority.

Ms. Burke asserts that the factual site data recorded during site investigations do not align with the narrative as presented in the EIAR and NIS.

The Applicant rejects the assertion of Ms. Burke and can confirm that the data recorded during site investigations is accurately set out at Chapter 6 (Volume I) of the EIAR and at Annexes 6.1 and 6.2 (Volume II). The site investigations were undertaken by recognised specialists and comprised walkover surveys and visual inspections, geophysical surveys, trial pits, cable percussion boreholes, rotary core boreholes and geotechnical testing of soil and subsoil samples; were used to inform the iterative project design process which was undertaken and, subsequently, utilised to assess the likely effects of the proposed development on the geological environment.

Ms. Burke suggests that comments made during pre-application consultations; wherein it was noted that the proposed electricity substation was selected due to the absence of complex geologies; are not reflective of the site investigations undertaken. Again, the Applicant refutes this assertion and submits that this statement is fully supported by the findings of the site investigations and the assessment at Chapter 6 of the EIAR. In particular, we refer to Section 6.3.5.2 of Chapter 6 (Volume I) of the EIAR which states that:-

"The geophysical survey identified 2 no. zones of potential karstification within the site of the electricity substation. <u>However, no karst features were noted</u> <u>during the drilling of the 6 no. boreholes</u>. In total, 129.3m of borehole drilling has



been completed in the vicinity of the electricity substation by GII (2023). Bedrock is identified at an average depth of 8.6mbgl and no significant karst conduit features have been logged throughout the 129.3m of drilling. In total, 52m of drilling was in overburden (40%) with 5 no. of the 6 no. boreholes encountering overburden thicknesses in excess of 5m." [emphasis added]

Furthermore, Section 6.3.5.2 states that:-

"The results of the drilling provides confidence in stating that the local limestone bedrock is overlain by thick overburden deposits and bedrock is comprised of strong, fine to medium grained limestone or dolomitic limestone with discreet weathered zones and intermittent clay fractures." [emphasis added]

Accordingly, the Applicant submits that statements made during pre-application consultations were entirely consistent with the data recorded during site investigations and that the geological composition of the proposed development site is not complex. Accordingly, the likely significant effects of the proposed development on same can be readily predicted and assessed.

Ms. Burke contends that the description of the geological environment in Chapter 7 (Water) of the EIAR is not reflective of actual ground conditions, is fundamentally flawed and is invalid.

Once again, the Applicant rejects the contention of Ms. Burke and submits that the assessment of likely significant effects on the water environment has been undertaken on the basis of extensive desktop studies and fieldwork including walkover surveys and hydrological mapping, surface water sampling, groundwater sampling, geological site investigations, and groundwater level monitoring.

The assessment of likely effects on the water environment (surface and ground water) adheres to all relevant best practice methodologies and guidelines and has been undertaken in the context of extensive fieldwork and site-specific geological, hydrological and hydrogeological data.

Ms. Burke submits that the in-combination effects of joint bays associated with the permitted Seven Hills Wind Farm and those of the proposed development must be assessed.

The Applicant can confirm that the cumulative effects of the proposed development and the permitted Seven Hills Wind Farm have been fully and comprehensively assessed throughout the EIAR and NIS.

Ms. Burke contends that the Applicant has applied "conventional groundwater hydrology to define the groundwater level in a karst environment, where clearly such an approach does not apply."

The assessment of likely effects of the proposed development on hydrogeology has been informed by an extensive array of site-specific investigations including groundwater sampling, trial pits, soakaway testing, a groundwater monitoring well and seasonal groundwater level monitoring. Evidently, significant groundwater investigations have been undertaken to understand the specific characteristics of the hydrogeological environment at the proposed development site.

The findings of these investigations have informed both the design of the project; in terms of avoiding sub-surface karst features and informing the iterative design process; and the assessment of likely effects on the geological, hydrological and



hydrogeological environment; and the Applicant refutes the contention that the assessment of effects on the groundwater environment has applied "conventional" methods.

Ms. Burke submits that the 'Cross River', as identified in the EIAR and NIS, should be titled the 'Cross Drain'.

The EPA⁴ identifies the watercourse in question as the 'Cross [Roscommon]' which, for ease of reference, was referred to as the 'Cross River' or 'Cross [Roscommon] River' throughout the EIAR and NIS. Notwithstanding the above, the nomenclature used in the EIAR and NIS has no effect whatsoever on the assessments undertaken.

Ms. Burke contends that the environmental effects of the crossing of the Cross River/Drain are ignored as are the effects of the installation of the underground electricity line within the adjoining local road.

The Applicant rejects this contention and submits that the effects of the proposed development have been assessed in full in the EIAR and NIS. In particular, the effects of earthworks and excavations are assessed at Section 7.4.3.1 of Chapter 7 (Volume I) of the EIAR while the effects of horizontal direction drilling at the crossing of the Cross River/Drain are assessed at Section 7.4.3.8; and we refer the Board to same for further information.

Following the implementation of mitigation measures, it is assessed that the proposed development will have no likely significant effects on any surface waters including the Cross River/Drain; nor will it cause a deterioration in the status of surface or ground water bodies or jeopardise the achievement of objectives in the Water Framework Directive.

Ms. Burke submits that the structural instability and potential for sudden and catastrophic collapse of elements of the proposed development poses a significant risk.

On the basis of information available from the Geological Survey of Ireland and the extensive site investigations conducted; as described above; Section 6.4.3.5 of Chapter 6 (Volume I) of the EIAR assesses that the subsoils present at the electricity substation site together with the gently undulating terrain do not present any risk of ground instability or landslides. Furthermore, the site investigation data demonstrates an absence of significant karst features below the subsoils and, therefore, no significant risk of ground instability or collapse of project infrastructure.

Additionally, due to the characteristics of subsoils mapped along the route of the underground electricity line and the characteristics of the electricity line trench, it is assessed that there is no significant likelihood of ground instability.

Ms. Burke submits that the permitted Seven Hills Wind Farm and the proposed development are not self-contained units and are inextricably linked to the surrounding ecosystem via karstic hydrology.

The Applicant agrees with the statement of Ms. Burke that the Seven Hills Wind Farm and the proposed development are not self-contained units and, accordingly, the cumulative effects have been comprehensively assessed. However, it refutes the

⁴ https://gis.epa.ie/EPAMaps/



suggestion that any connectivity has been ignored by the Applicant. The interconnected nature of the hydrogeological environment is reflected in the comprehensive assessment, including cumulative assessment, undertaken at Chapter 7 (Volume I) of the EIAR and the Seven Hills Wind Farm and proposed development have not been assessed as "*self-contained units*".

Section 7.4.8 of Chapter 7 (Volume I) of the EIAR assesses that "...the likelihood of cumulative hydrogeological effects is imperceptible" and that "the implementation of the proposed drainage measures will ensure that there will be no significant cumulative negative effects on the water environment during construction of the electricity substation, and other developments within the River Shannon catchment" including the permitted Seven Hills Wind Farm. With respect to the underground electricity line, it is assessed that "...significant effects are very unlikely due to the localised nature of the construction works along the underground electricity line. Impacts on the water environment are assessed as not likely to extend beyond the immediate vicinity of the underground electricity line excavations."

Accordingly, therefore, the Applicant submits that the likelihood of significant cumulative effects on the hydrogeological environment have been fully assessed and significant effects are not likely to arise.

Ms. Burke contends that the subject application poses significant threats to the environment.

The assessments undertaken in the EIAR have been supported by comprehensive desktop and field surveys and have concluded that the proposed development does not pose a risk of likely significant effects on the environment and that that any likely adverse environmental effects resulting from the proposed development can be adequately mitigated.

Separately, the NIS; which is also supported by desktop and field studies; has concluded "...beyond all reasonable scientific doubt that the project, either alone or in combination with other plans or projects will not undermine the conservation objectives of any European sites. It can therefore be concluded that the project will not have an adverse effect on the integrity of any European site."

Accordingly, the Applicant rejects the contention of Ms. Burke and submits that the proposed development can be constructed and operated without having any significant adverse effect on the environment; including in combination with other existing, permitted and proposed developments; and that the proposed development would be in accordance with the proper planning and sustainable development of the area.

As the purpose of the proposed development is to facilitate the connection of the permitted Seven Hills Wind Farm to the national electricity network, the proposed development, in combination with the Seven Hills Wind Farm, will make a substantial positive contribution to the achievement of Ireland's binding renewable energy generation and greenhouse gas abatement targets.

6.0 CHRISTOPHER WALSH & MAIREAD FARRELL

Mr. Walsh & Ms. Farrell submit, on a number of separate occasions, that the Applicant has failed to adequately assess the effects of the proposed development on the regional and local road network and has failed to assess the cumulative effects of the



project with other developments.

Contrary to the assertions of Mr. Walsh & Ms. Farrell, the Applicant submits that the likely effects of the proposed development on transport, access and the road network have been assessed in full. Section 12.2 of Chapter 12 of (Volume I) of the EIAR provides a comprehensive assessment of the likely direct, indirect and cumulative effects of the proposed development during the construction, operational and decommissioning phases.

Given the characteristics of the proposed development, the assessment focuses on direct effects arising from the upgrade of the proposed site entrance and effects on public roads arising from the installation of the underground electricity line; indirect effects arising from increased traffic volumes on the public road network. Additionally, Section 12.2.4.4 of Chapter 12 (Volume I) provides a detailed assessment of the likelihood of cumulative effects arising from the proposed development with a wide range of other existing, permitted and proposed developments, including the permitted Seven Hills Wind Farm.

Mr. Walsh & Ms. Farrell contend that the EIAR attempts to circumvent cumulative assessment and suggest that the approach adopted represents project splitting.

The O'Grianna & Ors v. An Bord Pleanála ([2014] IEHC 632) judgement held that, for environmental assessment purposes, grid connection infrastructure could not be separated from the balance of a wind farm project and that the significant environmental effects of both the wind farm and its grid connection must be assessed cumulatively by the Planning Authority and/or An Bord Pleanála. Notably, the O'Grianna Judgement explicitly does not require that a wind farm and its connection to the national grid be part of a single planning application.

The planning application lodged with the Board was accompanied by a comprehensive EIAR which assessed the entirety of the permitted Seven Hills Wind Farm development in combination with the subject proposed development. The Board has before it, therefore, a complete set of environmental assessments to enable it to carry out an EIA of the project in its entirety. The assertion of Mr. Walsh & Ms. Farrell that the proposed development represents project splitting therefore has no basis.

The EIAR submitted is fully compliant with the requirements set out in the EIA Directive and the **O'Grianna Judgement**. The environmental assessments undertaken have assessed the likelihood of in-combination and cumulative effects and concluded that significant effects on the environment are not likely.

Mr. Walsh & Ms. Farrell contend that the Applicant has failed to assess the cumulative effects of a proposed development at Knocknanool, Brideswell, Athlone.

The development referred to by Mr. Walsh & Ms. Farrell is understood to be that permitted under Roscommon County Council Planning Register Reference 23/60269⁵. This development is listed at Table 1.4 of Chapter 1 (Volume I) of the EIAR and has been considered in the assessment of likely significant cumulative effects.

Mr. Walsh & Ms. Farrell assert that the Applicant has failed to assess the impacts of the proposed development on the public road network, including in combination with

⁵ https://www.eplanning.ie/RoscommonCC/AppFileRefDetails/2360269/0



the Seven Hills Wind Farm.

As set out above, Section 12.2.4.4 of Chapter 12 (Volume I) of the EIAR provides a detailed assessment of the likelihood of cumulative effects arising from the proposed development with the permitted Seven Hills Wind Farm. The assessment concludes that the predicted increase in traffic volumes arising from the construction of the Seven Hills Wind Farm and the proposed development is not significant and that cumulative effects on transport and access are likely to be no greater than moderate, indirect, negative and temporary.

Following the implementation of mitigation measures described at Section 12.2.5.1 of Chapter 12 of the EIAR, residual effects during the construction phase (Section 12.2.6.1) are assessed to be slight-to-imperceptible negative and short-term; and significant effects are not assessed as likely.

Mr. Walsh & Ms. Farrell refer to the potential for flooding along the R362 which has been identified as a potential delivery route for construction materials.

As set out at Section 2.3.5 of Chapter 2 (Volume I) of the EIAR, the selection of material suppliers will be subject to a competitive procurement process and will be selected prior to the commencement of development. Accordingly, it cannot be confirmed if the R362 will be utilised in the delivery of construction materials.

In the event that any road proposed to be utilised for construction material deliveries is affected by flooding, or is closed for any other reason, delivery vehicles will follow the diversionary route(s) implemented by the Planning Authority. While unlikely, in the event that the diversionary route is found to be unsuitable for HGVs, an alternative suitable route will be identified and utilised following agreement with the Planning Authority as part of the TMP.

Mr. Walsh & Ms. Farrell submit that the Applicant has not undertaken a structural assessment of the affected public road network, has not assessed the effect of the proposed development on the local road network and has not assessed the impact of the proposed development on vulnerable road users.

The Applicant can confirm the public roads involved in the proposed development and proposed to be utilised in the transport of construction materials have not been subject to a structural assessment. The decision not to undertake a structural survey prior to the submission of the planning application was informed by both the project design team and the EIAR team who did not identify any roads or structures which were assessed to be of particular concern. Furthermore, the proposed development does not require the delivery of any abnormal sized or weight loads and all materials will be delivered by standards HGVs which will adhere to all axle loading regulations. Accordingly, a structural survey was not deemed to be warranted.

The Applicant has also committed, at Section 12.2.5.1 of Chapter 12 (Volume I) of the EIAR, to carrying out pre-construction carriageway condition surveys and that, following the completion of the surveys, any works which are identified as being required to accommodate the delivery of components or materials shall be undertaken. The Applicant has also committed to the remediation of any carriageways or structures in the event that any deterioration is identified in the post-construction surveys. Any works arising from the pre- and post-construction surveys shall be completed in consultation with, and to the satisfaction of, the Planning Authority.



As part of the pre- and post-construction surveys, the Applicant is also committed to undertaking a structural survey of the affected routes and structures. As above, in the event that any necessary works or remedial actions are identified as being required, these shall be undertaken in consultation with the Planning Authority.

As has been discussed at length above, the Applicant has carried a full and comprehensive assessment of the likely effects of the proposed development on the public road network and we refer the Board to Chapter 12 (Volume I) of the EIAR and to the responses provided above for further details.

Mr. Walsh & Ms. Farrell contend that the Applicant has ignored guidance from TII regarding the assessment of cumulative effects.

The Applicant rejects this contention and, as described above, has undertaken an extensive assessment of likely cumulative effects arising from the proposed development in combination with other existing, permitted and proposed developments. We refer the Board to Chapter 12 (Volume I) of the EIAR and to the responses provided above.

7.0 LIAM KILDEA

Mr. Kildea queries whether all relevant datasets available from the GSI have been utilised.

The Applicant can confirm, as set out at Chapters 6 and 7 (Volume I) of the EIAR, that all relevant datasets made publicly available by the GSI have been reviewed and consulted as part of the desktop assessment of the proposed development. The information available in these datasets was supplemented by site-specific ground investigations to fully understand the geological and hydrogeological conditions of the proposed development site.

Mr. Kildea objects to the route of the underground electricity line due to the digging of a 2 meter trench along areas which have a very high likelihood of voids.

Firstly, we wish to clarify that the proposed underground electricity line will be installed within ducts in a trench with a depth of c. 1.3m and not 2m as contended by Mr. Kildea.

Section 6.4.3.5 of Chapter 6 (Volume I) of the EIAR assessed the likelihood of ground instability and failure as a consequence of the proposed development and, in respect of the underground electricity line, concluded that "The underground electricity line comprises of a 1.2m deep trench below an existing roadway and, based on these characteristics, it is assessed that there is a negligible likelihood of ground instability".

Mr. Kildea contends, on a number of occasions, that the information provided with the planning application does not adequately allow the public to understand the project and its impacts.

The planning application for the proposed development has been prepared and submitted fully in accordance with all relevant requirements of the Planning Act and the Planning Regulations and all information has been made available on the dedicated planning application website (www.moyvannansubstation.ie).

The Applicant rejects the contention that the information made available on the website is inadequate, as it clearly indicates the information and documentation forming part of the planning application and, separately, the EIAR including a Non-



Technical Summary.

Mr. Kildea further contends that the website includes "vague references" as to the siting of the proposed development and does not include a set of coordinates. The Applicant is not obliged to provide coordinates of the proposed development to the public but has identified the location of the proposed development in the accompanying planning application drawings, listed the public roads in which the proposed underground electricity line will be located and listed the townlands within which the proposed development will be located.

Therefore, the Applicant submits that it is abundantly clear as to the location of the proposed development and does not accept the contention of Mr. Kildea. The information submitted with the planning application allows the public concerned to understand the project and its impacts, and the Board has raised no concerns in respect of same.

Mr. Kildea queries the appropriateness of installing the underground electricity line and joint bays in areas of Extreme groundwater vulnerability.

As described at Section 7.3.15 of Chapter 7 (Volume I) of the EIAR, and based on GSI databases, groundwater at the proposed development site is classed as 'Important' due to the underlying Regionally Important Aquifer; while groundwater vulnerability is mapped as 'Extreme'. While site-specific investigations indicate that the groundwater aquifer is not regionally karstified and that groundwater vulnerability tends to be Moderate-to-High; groundwater has been assessed to be "very sensitive" in accordance with the precautionary principle.

As described above, the proposed underground electricity line will be installed within ducts in a trench with a depth of c. 1.3m and within the public road network and verges. Accordingly, as described at Section 7.4.3.2 of Chapter 7 (Volume I) of the EIAR, no effects on groundwater are expected due to the shallow nature of the proposed works. However, given the acknowledged sensitivity of the hydrogeological environment, an extensive set of mitigation measures are proposed at Sections 7.5.1, 7.5.2 and 7.5.3 to ensure that there are no likely significant adverse effects on groundwater.

Following the implementation of these measures, it is assessed that the proposed development will have no likely significant effect on groundwater or groundwater bodies.

Mr. Kildea queries whether the proposed underground electricity line will cross any eskers.

As described at Section 6.3.3.1 of Chapter 6 (Volume I) of the EIAR, there are a number of fluvioglacial deposits, including eskers, in the townlands of Derryglad and Eskerbaun; however, these features are not designated for geological or ecological purposes.

Given that the underground electricity line will be located within the corridor of the public road network and at a shallow depth of c. 1.3m and above the groundwater table, significant effects on any eskers are not assessed as likely.

Mr. Kildea queries whether the effects on bird species, and installation the underground electricity line, will occur in specific months.

The likelihood of significant effects on bird species has been assessed, in full, at



Chapter 5 (Volume I) of the EIAR and, separately, in the NIS. The respective assessments have concluded that the proposed development does not pose a risk of any likely significant effects on any bird species.

The assessments undertaken did not identify any requirement for temporal restrictions regarding the installation of the underground electricity line and no such restrictions have been proposed. As described at Section 5.7.1.5 of Chapter 5 (Volume I) of the EIAR, most construction activities at the electricity substation, which have the potential for disturbing sensitive bird species, will be undertaken during the breeding season (April to August inclusive) to minimise disturbance to wildfowl and waders which use the turloughs to the south of the electricity substation site.

Mr. Kildea contends that mapping prepared by the Applicant fails to identify all groundwater karst features.

The Applicant rejects this contention and can confirm that the mapping prepared by the Applicant, at Annex 6.3 (Volume II) of the EIAR, is fully accurate and based on publicly available datasets published by the GSI and others.

Mr. Kildea queries the appropriateness of carrying out excavations alongside and inside proposed Natural Heritage Areas.

The basis of Mr. Kildea's query is unclear as the proposed development site is not located within or in the immediate environs of any proposed Natural Heritage Area (pNHA). The nearest pNHA, Lough Ree pNHA, is located c. 1.9km from the proposed development site at its nearest point.

Mr. Kildea submits that flooding is a recurring issue in South Roscommon and queries how the proposed development will prevent natural flows between turloughs, lakes and underground conduits.

Flooding and the groundwater environment have addressed above and we refer the Board to responses provided to Mr. Cunniffe & Ms. Ní Mheachair and Ms. Burke.

In summary, however, it is assessed that due to the nature of the proposed development; being shallow and near-surface; and the characteristics of the geological and hydrogeological environment within the proposed development site, there is no likelihood of significant effects on groundwater flows or a risk of flooding.

Mr. Kildea raises concerns as to potential disruption to aquifers.

As described above, earthworks associated with the proposed development will be extremely shallow and will have no interaction with aquifers. Additionally, a comprehensive set of mitigation measures have been proposed to ensure that there are no likely significant effects on groundwater. Full details of the assessment undertaken are provided at Chapter 7 (Volume I) of the EIAR.

Mr. Kildea questions whether a geotechnical survey has been conducted along the route of the underground electricity line to identify areas at risk of sinkhole formation.

Following a visual inspection of the route of the underground electricity line (see Section 6.2.2 of Chapter 6 [Volume I] of the EIAR) which included exposed soils, subsoil, bedrock and topographic changes; it was assessed, based on the professional judgement and experience of the surveyors and authors of Chapter 6, that a geotechnical survey of the route was not required.



As described above in response to previous comments made by Mr. Kildea, the risk of ground instability or failure is assessed to be negligible.

Mr. Kildea submits that the proposed development may result in disruption to agricultural activities due to soil compaction, drainage alterations or access restrictions.

No third party agricultural lands will be affected by the proposed development. As there will be no construction activities within third party lands, there is no risk of soil compaction; while best practice construction methods will be employed at the electricity substation site to minimise any likely risk of compaction.

The proposed development will not alter existing drainage arrangements and will have no effect on the existing drainage network or hydrological environment. Where the underground electricity line interacts with an existing culvert or drainage pipe, appropriate measures will be implemented to avoid any effect on the culvert or pipe or, where necessary, the culvert/pipe will be replaced on a like-for-like basis to ensure that drainage flows are maintained and remain unaltered.

As set out at Section 12.2.4.1 of Chapter 12 (Volume I) of the EIAR; there will be localised traffic disruption during the construction phase due to the narrow profile of the local roads involved in the proposed development and the presence of construction plant, machinery and personnel. Accordingly, full road closures will be implemented on a rolling basis; however the section of road to be closed at any given time is unlikely to exceed c. 100m. Given the extensive road network in the local area, diversionary routes are readily available while specific arrangements; which will form part of a TMP to be agreed prior to the commencement of development; will be implemented to maintain access for residents, landowners and business operators.

Mr. Kildea submits that the proposed development creates a risk of habitat fragmentation, disruption to wildlife movement, reduced ecosystem connectivity and effects on species dependent on karst habitats.

The likely effects of the proposed development on biodiversity and ecological receptors have been fully assessed at Chapter 5 of the EIAR and we refer the Board to same. The assessment concludes that the proposed development is not likely to have a significant adverse effect on any ecological receptors; while proposed enhancement measures are assessed as having a significant positive effect on biodiversity.

Mr. Kildea raises concerns in relation to potential contravention of the Water Framework Directive (Directive 2000/60/EC) and European Communities Environmental Objectives (Groundwater) Regulations 2010.

A Water Framework Directive Assessment has been undertaken and is presented at Annex 7.4 (Volume II) of the EIAR. We refer the Board to same for full details of the assessment; however, in summary, is assessed that the proposed development:-

"O will not cause a deterioration in the status of all surface and groundwater bodies assessed;

- will not jeopardise the objectives to achieve 'Good' surface water/groundwater status;
- does not jeopardise the attainment of 'Good' surface water/groundwater chemical status;



- does not jeopardise the attainment of 'Good' surface water/groundwater quantity status;
- does not permanently exclude or compromise the achievement of the objectives of the WFD in other waterbodies within the same river basin district;
- is compliant with the requirements of the Water Framework Directive (2000/60/EC); and,
- is consistent with other Community Environmental Legislation including the EIA Directive (2014/52/EU), the Habitats Directive (92/43/EEC) and the Birds Directive (2009/147/EC) (Note that a full list of legislation complied with in relation to hydrology and hydrogeology is included in Section 7.1.4 of EIAR Chapter 7)."

In light of the above, and given the absence of likely significant effects on groundwaters, the Applicant submits that the proposed development is fully compliant with the requirements of the Water Framework Directive and Environmental Objectives (Groundwater) Regulations 2010 (as amended).

Mr. Kildea asserts that the proposed development presents a substantial risk of contamination of the groundwater system.

Following the implementation of mitigation measures as set out at Sections 7.5.1 and 7.5.2 of Chapter 7 (Volume I) of the EIAR, it is assessed there will be no likely significant residual effects on groundwater flows, groundwater levels or groundwater quality in any groundwater body.

Mr. Kildea questions the absence of archaeological digs or investigations in the assessment of effects on archaeological features.

The scope of the assessments undertaken was informed through desktop research, field surveys and consultation with relevant bodies. The desktop studies identified that there are no recorded monuments of features within the proposed development site; while field surveys did not identify any potential unrecorded features.

Additionally, in response to a scoping and consultation request, the Department recommended that an Archaeological Impact Assessment be conducted comprising of a desk study and fieldwork. Notably, the Department did not identify the requirement for any intrusive archaeological investigations to be undertaken.

Consequently; and given the absence of previously recorded features, the absence of evidence indicating the presence of unrecorded features and the comments of the Department; it was determined that intrusive archaeological investigations were not required to inform the preparation of Chapter 10 (Volume I) of the EIAR.

Section 10.6 of Chapter 10 (Volume I) of the EIAR includes a set of mitigation measures to ensure that likely significant effects on archaeological features are avoided.

8.0 SKEAVALLEY WIND TURBINE ACTION GROUP

The matters raised by the Skeavally Wind Turbine Action Group relate exclusively to the permitted Seven Hills Wind Farm. Accordingly, the Applicant considers that a response is not required.

9.0 GERARD & ANGELA LENNON



Mr. & Mrs. Lennon submit that the public roads are not of a sufficient width to accommodate joints bays which are 4m wide.

Firstly, we wish to clarify that joint bays will, as detailed at Figure 12 of the Planning Application Drawings submitted, have a width of 2.5m and not 4m as contended by Mr. & Mrs. Lennon.

The siting of the joint bays has been described at Section 3.4.4 of Chapter 3 (Volume I) of the EIAR and further discussed in response to comments raised by the Planning Authority above, and we refer the Board to same.

10.0 MARTY & MARY MOORE

Mr. & Mrs. Moore query why the Applicant is applying for planning permission for the proposed development under Section 182A and not under Section 146B.

The rationale for the approach adopted by the Applicant in respect of this proposed development is set out in detail at Section 1.0 of the Planning Statement (Letter to An Bord Pleanála) as submitted with the planning application and we refer the Board to same.

However, in summary, due to the likely prioritisation of 2 no. third party developments for connection to the Monksland electricity substation, the Applicant has sought to identify an alternative means of connecting the permitted Seven Hills Wind Farm to the national electricity network. Accordingly, as there remains a degree of uncertainty as to whether the third party developments will avail of their connection offer and actually connect to the Monksland substation, it remains a possibility that the Seven Hills Wind Farm could yet connect to the Monksland substation. Therefore, in order to maintain the option of connecting to the Monksland substation, the Applicant decided to seek planning permission for the subject proposed development under Section 182A of the Planning Act as opposed to seeking to alter the existing planning consent for the Seven Hills Wind Farm under Section 146B of the Planning Act.

As set out at Section 1.0 of the Planning Statement, in the event that planning permission is granted for the proposed development and the Seven Hills Wind Farm is to be connected to the electricity network via the proposed development, the Applicant will seek to alter the Seven Hills Wind Farm consent via a future request under Section 146B to omit the relevant part of the permitted underground electricity cable which will no longer be required.

11.0 SHANE BUTLER

The submission of Mr. Bulter reflects many of the matters raised by Ms. Burke and we refer the Board to the responses previously provided.

Mr. Butler also comments on the accommodation of joint bays within the public road network and, again, we refer the Board to responses provided above.

12.0 ULICK BURKE

The matters raised by Mr. Burke relate exclusively to the permitted Seven Hills Wind Farm. Accordingly, the Applicant considers that a response is not required.

13.0 DERMOT BUTLER



The matters raised by Mr. Butler relate exclusively to the permitted Seven Hills Wind Farm. Accordingly, the Applicant considers that a response is not required.

14.0 EILEEN KELLY

Ms. Kelly contends that the proposed development poses a risk of disruption to water flows, increased sedimentation, groundwater contamination.

Each of these matters have been addressed in previous responses provided above and we refer the Board to same.

15.0 MAUREEN KELLY

Ms. Kelly refers to concerns regarding the accommodation of joint bays, traffic disruption and effects on biodiversity and natural habitats.

Each of these matters have been addressed in previous responses provided above and we refer the Board to same.

16.0 SHANE & ORLA KINAHAN

Mr. & Mrs. Kinahan submit that the proposed development will contribute to significant additional flooding in the area.

The issue of flooding has been addressed in detail in previous responses provided above and we refer the Board to same.

In summary, the Flood Risk Assessment (Annex 7.2 [Volume II] of the EIAR) concludes that the proposed development "*is appropriate from a flood risk perspective*" and that "*the risk of the project contributing to downstream flooding is also very low*".

Mr. & Mrs. Kinahan raise concerns as to the effects on local wildlife and refer, particularly, to effects on swans, Egyptian Vulture and Egret.

The likely effects on ecological receptors, including avian species, have been addressed in previous responses provided above and are assessed in full at Chapter 5 (Volume I) of the EIAR and the NIS and we refer the Board to same.

With regards to the Egyptian Vulture, a single bird was recorded in County Roscommon between December 2021 and May 2022. The species is typically found within the Iberian Peninsula, North Africa, West Asia and India; and it is widely accepted that the sightings in Ireland were of a wild vagrant which had likely visited Ireland for unexplained reasons, potentially due to weather events or navigational error. Regardless of the explanation as to why the Egyptian Vulture visited County Roscommon, the proposed development has been fully assessed and does not pose a risk of likely significant collision or disturbance/displacement effects on any avian species.

17.0 ANNE & PJ DALY

Mrs. & Mr. Daly refer to concerns regarding health effects from electromagnetic fields, effects on habits and birds, effects on flooding, and traffic disruption.

Each of these matters have been addressed in previous responses provided above and we refer the Board to same.

Mrs. & Mr. Daly submit that the proposed electricity substation will emit persistent low-



frequency noise.

As set out at Section 11.3.3.1 of Chapter 11 (Volume I) of the EIAR, the electricity substation will not generate any noise during the operational phase due, primarily, to the absence of an electrical transformer or other noise generating equipment. Any site maintenance works which may be undertaken during the operational phase will have similar noise characteristics to typical agricultural activities and no significant effects are assessed likely.

Mrs. & Mr. Daly question the purpose and operational lifespan of the proposed development.

The proposed development, as described at Section 3.2 of Chapter 3 (Volume I) of the EIAR, is being proposed for the sole purpose of connecting the Seven Hills Wind Farm to the national electricity network. As stated within Section 3.2; following construction, the electricity substation (and underground electricity line) will be transferred to EirGrid and will be operated by EirGrid as part of the national electricity network. Therefore, and as also stated at Section 3.2, it is likely that the proposed development will continue to operate following the decommissioning of the Seven Hills Wind Farm.

18.0 MARGARET DALY

Ms. Daly raises concerns relating to health effects and EMF, water contamination, effects on bird species, flooding, noise, and traffic disruption.

Each of these matters have been addressed in previous responses provided above and we refer the Board to same.

19.0 JOHN JOE KENNEDY

The submission of Mr. Kennedy reflects many of the matters raised by Ms. Burke above and we refer the Board to the responses previously provided.

20.0 CIARA FARRELL

Ms. Farrell contends that the Applicant fails to set out the requirement for the proposed development in the context of the permitted grid connection infrastructure.

The rationale for the approach adopted by the Applicant in respect of this proposed development is set out in detail at Section 1.0 of the Planning Statement (Letter to An Bord Pleanála) as submitted with the planning application and discussed further in response to comments raised by Mr. & Mrs. Moore above.

Ms. Farrell submits that there is no rationale for seeking a 10-year planning permission.

As set out at Section 8.0 of the Planning Statement submitted with the planning application, a 10-year planning permission has been applied for to ensure that all necessary supplementary statutory consents and licences can be obtained and implemented. Such consents and licences, many of which can only be applied for following the granting of planning consent (including those related to the Seven Hills Wind Farm), include:-

- discharge of all planning conditions to be agreed with the Planning Authority;
- grid connection offer/agreement from EirGrid/ESB Networks;



- Authorisation to Construct as issued by the Commission for the Regulation of Utilities;
- Licence to Generate as issued by the Commission for the Regulation of Utilities and,
- Road Opening Licences and Road Closure Permits as issued by the Planning Authority.

A 10-year planning permission is therefore commonplace for wind energy and associated developments in Ireland, including the permitted Seven Hills Wind Farm, as specifically provided for at Section 7.20 of the Wind Energy Development Guidelines for Planning Authorities 2006.

In addition to the above, the pre-construction process of a renewable energy and associated electrical infrastructure project is particularly time-consuming and requires extensive consultation with multiple statutory bodies over extended periods of time; with many of these licencing and consultation processes currently experiencing significant delays. The Applicant submits, therefore, that a 10-year permission is appropriate to ensure that all processes can be satisfactorily completed such that there is no risk of the planning consent lapsing. In the event that the planning consent were to lapse prior to all necessary licencing arrangements being in place, the Seven Hills Wind Farm may not be in a position to connect to the electricity network and contribute to the achievement of Ireland's binding renewable energy and greenhouse gas abatement targets.

Ms. Farrell refers to comments made by the Department and contends that the project may represent project splitting.

The issue of project splitting has been addressed in response to comments made by Mr. Walsh & Ms. Farrell above, and we refer the Board to same.

Ms. Farrell refers to comments in the EIAR Scoping Report that a cumulative assessment has not been undertaken.

Section 5.0 of the Noise & Vibration Scoping Report enclosed within Annex 1.1 (Volume II) of the EIAR states that:-

"Due to the 8km distance from proposed development to Seven Hills Wind Farm, cumulative assessment considering the wind farm is not included in the scope of the environmental noise assessment. However, if desired, discussion of cumulative construction noise due to other development, whether they be renewable energy, quarries, infrastructure or residential, can be included."

Subsequently, the Applicant decided that a full cumulative assessment of the likely significant noise and vibration effects arising from proposed development should be undertaken and it is provided at Section 11.5.5 of Chapter 11 (Volume I) of the EIAR. During the construction phase, it is assessed that there is no risk of likely significant cumulative effects due, primarily, to the separation distance between receptors likely to be affected by the subject proposed development and the permitted Seven Hills Wind Farm. In the village of Brideswell, at the interface between the proposed development and permitted development, works will be undertaken consecutively thus avoiding any likely significant noise or vibration effects.

During the operational phase, the proposed development will not generate any noise or vibration effects and, therefore, cumulative effects will not occur.



The Applicant submits, therefore, that a full cumulative assessment of likely noise and vibration effects has been undertaken.

Ms. Farrell contends that the cumulative assessment undertaken is inadequate and fails to assess the permitted wind farm and grid connection infrastructure.

The Applicant rejects this contention and submits that a comprehensive cumulative assessment of the proposed development has been conducted; within both the EIAR and NIS; in combination with all relevant existing, permitted and proposed developments, including the permitted Seven Hills Wind Farm.

Ms. Farrell submits that previous assessments and investigations were not reviewed to determine if there had been any changes to the baseline environment.

The Applicant can confirm that the EIAR, NIS and all accompanying information relevant to the permitted Seven Hills Wind Farm was reviewed by the project EIAR team as part of the environmental scoping and constraints analysis process as described at Annex 1.1 (Volume II) of the EIAR. For reasons including the recency of the baseline information and the separation distance between the proposed development and the permitted Seven Hills Wind Farm (particularly the locations of the wind turbines), it was concluded that further baseline investigations and assessments were not warranted and that all necessary information to inform a cumulative assessment of the respective projects could be obtained through desktop reviews of the available information.

Ms. Farrell questions the decision of the Applicant to screen out SPAs, NHAs and pNHAs due to an absence of ecological connectivity.

Despite the absence of specific guidance on establishing ecological connectivity, there are a wide range of best-practice methods which can be used to identify such connectivity. Full details of the methods used in the identification of connectivity with Natura 2000 sites is set out at Section 3.4 of the NIS and includes the 'source-pathway-receptor' model; consultation with the guidance document Assessing Connectivity with Special Protection Areas (SPAs) (2016) as prepared by NatureScot (formerly Scottish Natural Heritage); the identification of core foraging distances of waterbirds which utilise SPAs in the wider region; and consideration of the risks of airborne pollution.

The screening of Natura 2000 sites and the establishment, or otherwise, of ecological connectivity is described at length at Table 3.2 of the NIS.

With respect to designated conservation sites and other ecological receptors, a Zone of Influence was defined on the basis of the characteristics of the proposed development and whether, or not, connections or pathways for potential effects exist. Further details on the method used for the establishment of the Zone of Influence are described in detail at Section 5.2.4.2 of Chapter 5 (Volume I) of the EIAR. Moreover, connectivity between the proposed development site and designated conservation sites is comprehensively assessed at Tables 5.4 and 5.6 of Chapter 5 of the EIAR and we refer the Board to same for further details on the establishment of ecological connectivity.

Where potential ecological connectivity between the proposed development site and designated sites could not be established, the relevant designated site was subsequently screened out from further assessment.



Ms. Farrell submits that the Curlew population ought to have been afforded a higher level of importance and that it has not been demonstrated that the proposed development would not contravene the conservation objectives of bird species including Whooper Swan, Lapwing and Black-headed Gull.

During the ornithological surveys undertaken, a single curlew was heard during the non-breeding season within 500m of the proposed electricity substation which clearly illustrates a very low level of usage of the proposed development site and its environs by the species. This corresponds to 0.007% of the Republic of Ireland non-breeding population, and 0.26% and 0.35% of the regional (Roscommon & Westmeath) and county (Roscommon) curlew populations. On this basis, it is assessed at Table 5.9 of Chapter 5 (Volume I) of the EIAR that curlew at the proposed development site and its environs are of local-higher importance.

Notwithstanding the above, Chapter 5 of the EIAR assesses that the proposed development poses a risk of significant disturbance/displacement effects on curlew during the construction phase. However, with the implementation of mitigation measures as described at Section 5.7.1.5 of Chapter 5, it is assessed that likely effects on the curlew population will not be significant.

A similar assessment has been adopted in respect of Whooper Swan, Lapwing and Black-headed gull; each of which have been identified as 'important ecological features'. For further details of the assessment of each of these species, we refer the Board to Chapter 5 (Volume I) of the EIAR submitted. However, in summary, the assessment finds that the proposed development is not likely to give rise to significant effects on any avian species, including each of those referred to by Ms. Farrell.

Each of these species are also qualifying interests of SPAs assessed in the NIS. Full details of the assessments undertaken are therefore also enclosed within the NIS and we refer the Board to same. Again, on the basis of the assessments undertaken, it is assessed that that the project, either alone or in combination with other plans or projects will not, beyond all reasonable scientific doubt, undermine the conservation objectives of any European sites or have an adverse effect on the integrity of any European site.

The Applicant submits that the assertion of Ms. Farrell is therefore unfounded and that the conservation objectives regarding avian species will not be contravened.

Ms. Farrell asserts that the conclusion that there will be no significant effects on terrestrial mammals is predicated on incomplete baseline data and inadequate assessments.

The Applicant does not accept the assertion of Ms. Farrell and submits that the assessment of likely significant effects on terrestrial mammals has been completed on the basis of a comprehensive desktop assessment, field surveys and an assessment of the characteristics of the proposed development. All surveys were undertaken in accordance with best practice methods and the Applicant rejects the suggestion that the surveys are incomplete and that the assessment is inadequate or erroneous.

Ms. Farrell also submits that impacts on badgers are under-identified or unidentified in the EIAR; however, no evidence to support this contention has been provided.

Ms. Farrell contends that the effects on otter have not been adequately assessed.

The EIAR and NIS have each conducted a comprehensive assessment of the likely



effects of the proposed development on otter; with each assessment being undertaken on the basis of desktop studies regarding the known distribution of otter, field surveys and an assessment of the characteristics of the proposed development.

Given the identification of otter activity within the Cross River/Drain, the species was afforded a local-higher importance in the EIAR and identified as an important ecological feature. The likelihood of effects on the species was assessed and, during construction, it was assessed that indirect effects arising due to reduced water quality and the consequential effects on fish stocks could, in the absence of mitigation, have a significant short-term effect on otter. Similarly, it was assessed that cumulative effects on otter could arise due to in-combination effects with other existing, permitted and proposed developments.

However, with the implementation of a comprehensive set of mitigation measures as described at Chapter 5 (Volume I) of the EIAR, residual effects on the species are assessed as likely to be not significant.

The effects on otter, as a qualifying interest of River Shannon Callows SAC, and as an Annex IV species, have been assessed in full in the NIS which identified a risk of disturbance/displacement and reduced prey in the absence of mitigation. With the implementation of mitigation measures as described at Section 5.7 of the NIS, the assessment found that the proposed development will not have a significant effect on the species or on the conservation objectives or integrity of any European nature conservation site.

Ms. Farrell submits that the Applicant has not followed the advice of the Board in terms of notifying the public as to the scope of the proposed development.

As Ms. Farrell has correctly identified; the Record of Meeting, as prepared by the Board pursuant to a pre-application consultation meeting under Reference ABP-319042-24, records the advice given to the Applicant and the request to provide clarity "<u>in the public notices and the application documentation of what is proposed</u> <u>and the need for such an approach</u>..." [emphasis added]. Contrary to the submission of Ms. Farrell, the advice of the Board does not direct the Applicant to set out the rationale for seeking planning permission under Section 182A of the Planning Act in both the public notices and the planning application documentation, or within the public notices only.

The Applicant therefore submits that the planning application has been prepared and submitted fully in accordance with the advice of the Board. Firstly, the public notices specify the description of the proposed development in detail, including the characteristics of the electricity substation, underground electricity line and all associated ancillary infrastructure. Secondly, the approach adopted by the Applicant in lodging a planning application under Section 182A, as opposed to seeking to alter the permitted Seven Hills Wind Farm under Section 146B, has been provided at Section 1.0 of the Planning Statement i.e. within the "application documentation". The Applicant respectfully submits, therefore, that the instructions of the Board have been complied within full and that there has been no departure from the advice of the Board, as alleged by Ms. Farrell.

21.0 CONCLUSION

We trust that the information provided herein satisfactorily addresses each of the matters raised in the submissions and observations received by the Board. This



submission has, as agreed in writing with the Board, been provided in digital format; however, hard copies can be provided on request.

Kind Regards,

Galetech Energy Services

Galetech Energy Services
ANNEX 1 – PLANNING-STAGE TRAFFIC MANAGEMENT PLAN





PLANNING-STAGE TRAFFIC MANAGEMENT PLAN

MOYVANNAN ELECTRICAL SUBSTATION

ENERGIA RENEWABLES ROI LIMITED

April 2025



Contents

1.	Intro	duction	1
	1.1	Development Description	1
	1.2	Scope of this Report	1
	1.3	Site Description	1
2.	Trans	port Management Principles	1
3.	Trans	port Route Identification and Assessment	2
	3.1	Existing Road Network	2
	3.1.1	National Secondary Road Network	2
	3.1.2	Local Road Network	2
	3.2	Aggregate Haul Route	2
4.	Subst	ation & Electricity Line Construction	2
	4.1	Construction Programme	2
	4.2	Working Hours	3
	4.3	Construction Traffic Volumes	3
	4.4	Construction Parking	3
	4.5	Turning Facilities	4
	4.6	Passing Bays	4
	4.7	Site Security	4
5.	Dutie	s and Responsibilities	4
	5.1	Appointed Contractor	4
	5.2	An Garda Síochána	5
	5.3	Road Engineers for Local Authority	5
	5.4	Emergency Services	5
6.	Trans	port and Traffic Management	5
	6.1	Traffic Management Procedures	5
	6.1.1	Traffic Control Tools	5
	6.1.2	Road Closures	6
	6.1.3	Traffic Diversions	6
	6.1.4	Lane Width Restrictions	6
	6.1.5	Public Notices	6
	6.1.6	Communications	7
	6.2	Traffic Management Controls	7

	6.2.1	General	7
	6.2.2	Access to Commercial /Business Properties	7
	6.2.3	Pedestrian Safety	7
	6.2.4	Signage	8
	6.2.5	Cleanliness of Roads	8
	6.2.6	Operator Training	8
	6.2.7	Emergency Crew	8
6.	3 Tr	affic Management Systems	8
	6.3.1	Road Closures	8
	6.3.2	Diversions	9
	6.3.3	Stop/Go Road Management System	9
	6.3.4	One-Way System	9
7.	Mitigati	on	9

Appendices

- Appendix A- Indicative Passing Bay Drawings
- Appendix B Sample Schedule of Signs
- Appendix C Sample Traffic Management Drawings and Check Sheets.
- Appendix D Traffic Diversion Drawing

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1. Introduction

1.1 Development Description

Malachy Walsh & Partners Ltd. (MWP) were appointed by Energia Renewables ROI Limited to provide planninglevel engineering services for the civil/structural design of a 110kV electricity substation and 110kV underground electricity line. The project, known as the Moyvannan Electricity Substation, is located in Co. Roscommon, approximately 8km northwest of Athlone town. The two primary design areas are:

- 1. 110kV electricity substation to EirGrid standards located in the townland of Moyvannan, Co. Roscommon.
- 2. 110kV underground electricity line located within in public road corridor.

1.2 Scope of this Report

The purpose of the Planning-Stage Traffic Management Plan is to provide a framework for managing the movement of construction vehicles to/from the site; specifically focused on the L7551, L7556 and the N61; with the aim to minimise the impact on the local road network during the construction period.

1.3 Site Description

The underground electricity line and electricity substation is associated with the Seven Hills Wind Farm which was granted planning permission by An Bord Pleanála in November 2023.

2. Transport Management Principles

The two core principles for planning, developing, and implementing transport management proposals are:

- To maximise the safety of the workforce and the travelling public.
- To keep traffic flowing as freely as possible and reduce the impact of the construction traffic and road works to a minimum.

For the purposes of the works to be carried out and in order to ensure that there is minimal effect on the commercial and socio-economic life of the surrounding areas, the appointed contractor will have regard to the above principles. The appointed contractor shall endeavour to meet these objectives by proper planning of the project and by compliance with the relevant procedures. Against this background and in the context of the construction of the substation and electricity line, the appointed contractor shall properly plan and manage the project to ensure that:

- Any works within the road network do not result in a safety hazard to road users or the workforce involved in the project.
- Any resulting increase in traffic delays and congestion are minimised.



The appointed contractor will liaise with An Garda Síochána and Roscommon County Council in the preparation of specific traffic management proposals and will ensure consideration of other planned construction schemes in the area. The appointed contractor will recognise that other external factors such as severe weather events can affect traffic flow close to the project and will endeavour to minimise the effect of the works on traffic in the planning and programming of the works at construction stage.

3. Transport Route Identification and Assessment

Impacts on the public road are intrusive for the construction of the underground electricity line; however, as demonstrated within the Environmental Impact Assessment Report (EIAR) accompanying the planning application, impacts for the substation are indirect and limited to impacts associated with deliveries to/from the site during the construction phase and the operational phase over the lifetime of the project.

3.1 Existing Road Network

3.1.1 National Secondary Road Network

The following National Secondary Roads in County Roscommon will be used during delivery and construction of the project.

• N61 and its junctions with the L7551 and the L7556

3.1.2 Local Road Network

The following Local Roads in County Roscommon will be used during delivery and construction of the project.

- L7551: Full route of road and the junctions with the N61 and L7556.
- L7556: Junction with L7551, approximately 675m towards N61 and the junction with the N61

3.2 Aggregate Haul Route

Aggregate and concrete deliveries will be sourced from local quarries, as described at Section 2.3.5 of Chapter 2 of the EIAR. Prior to the commencement of construction, a quarry (or quarries) will be selected to provide aggregates and the related haul routes will be selected.

4. Substation & Electricity Line Construction

4.1 Construction Programme

The proposed works will be in two distinct sections, electricity line and substation works. The construction works for the substation and electricity line are estimated to take 15-18 months. This will include the construction of

internal access tracks, temporary compound, surface water management systems, substation compound, internal/external cable trenches and associated works.

The construction of the substation and its associated deliveries are expected to last approximately 8-12 months.

The construction of the underground electricity line, its associated deliveries and road closure/traffic diversions along the L7551 are expected to last approximately 6-8 weeks.

4.2 Working Hours

Construction is proposed to occur within the following hours:

- 07.00 19.00* (Monday Friday)
- 07.00am 13.00* (Saturday)

Within these times, works will be programmed to avoid peak local traffic e.g. school runs

* The working day may extend occasionally at times when critical elements of work need to be advanced. If required, this will be agreed with the Local Authority in advance.

4.3 Construction Traffic Volumes

It's estimated that 15-18 months will be required for the construction phase of the substation and electricity line, which includes 2 months required for testing and energising. The two distinct sections of works require different vehicles, some of which are listed below, and the traffic volumes will fluctuate throughout the construction phase.

- Articulated trucks (HGVs) to bring initial plant and machinery to site and later to bring electrical equipment and other construction materials.
- Tipper trucks and excavation plant involved in site development and excavation works.
- Miscellaneous vehicles and handling equipment, including vehicles associated with construction workforce.

4.4 Construction Parking

It is forecast that there will be a maximum of 40 staff on site at any one time during the construction period, although this will vary subject to the overall programme of works. It is likely that there will be a degree of vehicle sharing by staff and, therefore, it is anticipated that there will be 15 staff vehicles per day arriving on site. Labour vehicle sharing will be actively encouraged to reduce vehicular movements.

On entrance/exit to/from the site, workers vehicles will report directly to the area of hard standing at the temporary site construction compound where there will be sufficient space for parking and turning. Site opening hours will be before the peak traffic period, and closing time will be after nighttime peak hours, and should therefore, not cause disruption at the peak periods on entrance/exit of the site.

No parking will be allowed for construction workers on the public road network in the vicinity of the site. A number of additional unscheduled visits may be required throughout the construction period for site inspections and unforeseen circumstances.



4.5 Turning Facilities

The construction compound has been designed to provide adequate space for vehicle manoeuvring and turning, and all HGV deliveries will report here for unloading. The turning area will ensure that all vehicles will ingress and egress in a forward gear to maintain safety on the public roadway in the vicinity of the site.

4.6 Passing Bays

The indicative passing bays have been designed to provide adequate space for vehicle manoeuvring and passings of HGV deliveries/movements. Five passing bays are proposed to be constructed, and maintained for the duration of the construction phase, along the L7551 for use by construction and public traffic. Existing natural widening in the road may also be utilised to allow vehicles to pass each other. The passing bays will minimise traffic disruption and avoid reversing of HGV vehicles on public roads. Details of the indicative proposed bays are shown in **Appendix A** and discussed further below.

4.7 Site Security

For security and safety purposes, the development site will be closed to the general public via security fencing and a locked gate. The security fence installed around the perimeter of the substation will be erected at the start of the construction programme and will remain for the duration of the construction phase.

Access to the construction site during construction hours will be controlled by personnel located at the entrance of the substation. All visitors will sign in and out with security. Visitors to the site will be given a Health and Safety site induction, escorted around the site and will remain with an appropriately trained person at all times. The escort will alert the visitors to hazards on site (including workplace health and safety issues) together with appropriate Personal Protective Equipment requirements.

5. Duties and Responsibilities

The following parties will have an input into traffic management and will be kept informed by the appointed contractor of developments in relation to traffic management:

- Appointed Contractor
- Project Supervisor Construction Stage (PSCS)
- Project Supervisor Design Process (PSDP)
- An Garda Síochána
- Road Engineers for Local Authority (Roscommon County Council)
- Emergency Services

5.1 Appointed Contractor

The appointed contractor shall consult with An Garda Síochána, the emergency services and all other relevant parties listed above during the preparation of any traffic management proposals. The appointed contractor, in their role as PSCS, will co-ordinate the implementation of the developed/detailed traffic management plan.



Where any issues arise with the traffic management plan, they shall consult with the relevant parties to revise or modify the traffic management plan to each party's satisfaction.

5.2 An Garda Síochána

An Garda Síochána shall have final authority regarding day-to-day traffic control. The appointed contractor will comply with all directions, instructions and requirements of An Garda Síochána.

5.3 Road Engineers for Local Authority

Road Engineers for Roscommon County Council are primarily engaged in the maintenance and management of the road network and its services in the area of the substation and electricity line. In respect of all works on, under, and above the road network, they are empowered as officers of the Road Authority to issue directions to undertakers of all works in relation to timing, the manner in which works are carried out, reinstatement and satisfactory completion. The appointed contractor will always ensure to work with the Roads Department of Roscommon County Council.

5.4 Emergency Services

In relation to accidents occurring on or caused by the works, the appointed contractor will provide all necessary assistance to deal with any emergency to An Garda Síochána, Ambulance and Fire Brigade services. The appointed contractor will consult with the emergency services regarding the traffic proposals for work in public areas/on public roads and within the project site.

Where a road closure may be active, the emergency services will be notified of suitable diversions. If the emergency is located along the works area, the appointed contractor will allow the emergency services to pass the works area by removing machinery from the road in an orderly fashion and allowing the emergency services pass under the supervision of the team leader. In the event of an emergency along the electricity line route, steel road plates will be available at the applicable works area to span the electricity line trench.

6. Transport and Traffic Management

6.1 Traffic Management Procedures

6.1.1 Traffic Control Tools

The contractor will use a range of traffic control tools, including temporary road closures, temporary traffic lights, stop/go boards, two way radios, safety barriers, cones, signage etc. Each crew on site will have personnel on site trained in Signing, Lighting and Guarding/Health and Safety at Road Works. Communication/Instruction of the Traffic Management Plan will come from the Project Manager and communicated to site personnel with the relevant training.

6.1.2 Road Closures

When a road closure is necessary to carry out the works, the contractor will seek a Temporary Closing of Roads Order. The contractor will advise the relevant Roads Authority (Roscommon County Council) of the following:

- Name of the road to be closed.
- Location of closing points.
- Date and period of closure required.
- Reasons for closure.
- Details of alternative routes.
- Details of traffic management method and maintenance of alternative routes, including sign posting and traffic control plans.

6.1.3 Traffic Diversions

Where traffic diversions are necessary due to temporary road closures associated with the works, the contractor will advise the relevant Road Authority (Roscommon County Council) of the following details:

- Location of proposed diversion.
- Reasons for specific traffic diversion.
- Duration of proposed diversion.
- Plan of diversion routes.
- Details for management and control of proposed method of diversion route traffic, including sign posting layouts and locations.
- Details of proposed system of diversion route maintenance and repair, including existing carriageway and street furniture etc.
- Details of proposed system of public communications and public liaison.

Alternative routes where traffic is to be diverted will require an inspection prior to diverting traffic. These will need to be inspected again closer to the time of the works to ensure no hazards have occurred since the traffic management plan was developed.

6.1.4 Lane Width Restrictions

Where lane width restrictions are necessary due to the construction of the electricity line, the contractor will advise the relevant Road Authority (Roscommon County Council) of the following details:

- Reasons for lane width restrictions.
- Details of restricted width of traffic lane.
- Details of associated signage and warnings to motorists and pedestrians, including road markings.
- Details of proposed system of public communications and public liaison.
- Temporary footpaths.

6.1.5 Public Notices

Public notices in respect of road closures or other traffic management tools are the responsibility of the Roads Authority (Roscommon County Council) who will undertake to publish such notices.



6.1.6 Communications

The employer is committed to providing a high level of communication to the general public and business community regarding the extent and duration of the project. The contractor will co-operate with the employer in this regard.

The employer / contractor will advise to the public:

- Commencement and duration periods for the works.
- Current and proposed road closures or other traffic management tools.
- Alternative routes.
- Provision for access / egress.

In the event of potential conflicts arising from construction activities, such conflicts shall be resolved, if possible, in consultation with the Roads Authority (Roscommon County Council), the contractor and, where necessary, An Garda Síochána.

6.2 Traffic Management Controls

6.2.1 General

- Material deliveries to site will be contained and managed to have minimal impact on the local community, details will be provided to Roscommon County Council by the appointed contractor.
- The contractor shall make provision for safe access at all times to private residences in proximity to the construction works.
- Steel plates or stone will be made available to allow access to residential properties. This will be done in co-operation / communication with local residents in the area.
- The contractor will will liaise with the residences along the L-7551 to understand their daily routines in terms of access/egress from their homes. Every effort will be made to accommodate their daily routines and to plan works around them.

6.2.2 Access to Commercial / Business Properties

• The contractor shall make provision along the L-7551 for safe access to commercial and business premises for employees, customers, the general public and for deliveries.

6.2.3 Pedestrian Safety

- The contractor shall ensure that throughout the course of the works its operations do not put pedestrians at any risk.
- Where the construction work necessitates the restriction or partial closure of a pedestrian walkway where they may exist, the contractor shall provide adequate safety barriers, signposts, lighting and temporary surfacing (if applicable) to ensure safe passage for pedestrians.
- Where the construction work necessitates the closure of a pedestrian walkway, the contractor shall provide a safe and reasonable alternative. The contractor shall provide adequate safety barriers, signposts, and lighting (if applicable) to direct pedestrians and ensure their safe passage.
- With respect to pedestrians, the contractor shall refer to and observe the requirements of the updated version of the *Traffic Signs Manual 2010* titled *Temporary Traffic Measures and Signs for Roadworks*.



6.2.4 Signage

- All sign faces are to be retro-reflective material to Class Ref 2 of EN 12899. The colours, chromaticity and luminance factors shall be as specified in Specification TS4. Sample Schedule of Signs included in **Appendix B**.
- Signage shall be inspected at least twice daily by the contractor so as to ensure that it is in place, secure and appropriately fitted with warning lights as required.

6.2.5 Cleanliness of Roads

• The contractor will provide sufficient resources on site to reduce the dirt and dust arising on the site and being trafficked onto the public road. Road sweeping and dust suppressant equipment will be kept onsite and will be used to ensure the cleanliness of the site entrance and the adjacent road network.

6.2.6 Operator Training

- The contractor will provide training to operatives in the traffic control systems being used on site. The importance of transport management, the safety of motorists, pedestrians and site staff shall be emphasised to all construction staff.
- There must be at least one competent person with a valid Construction Skills Registration Card on site at all times when work is being carried out on roads.

6.2.7 Emergency Crew

- The contractor's emergency contact telephone number shall be displayed at the contractor's site office and shall be notified to the Local Authority Roads Engineer, utility companies and the Emergency Services Providers. This telephone will be manned by the contractor's Project Manager or by an authorised deputy capable of making decisions in an emergency situation.
- The contractor shall set up an emergency crew, led by an experienced foreman or an engineer, for dealing with emergencies arising as a result of the works on roads outside of normal working hours. The emergency crew shall be available to respond to an event seven days a week.
- The contractor will issue the emergency crew with contact details for the emergency services and the utility companies, in the event that they are required.

6.3 Traffic Management Systems

A system of lane closures, diversions, stop/go measures and one-way systems will be implemented in the public roadway during the construction phase. See **Appendix C** for sample Traffic Management Drawings and Check Sheets.

The contractor will apply to Roscommon County Council for a Road Opening Licence prior to works commencing.

6.3.1 Road Closures

Roads closures will not be required for the construction of the electricity substation. Traffic will be accommodated by installing passing bays along the L-7551 to allow construction vehicles and public traffic to pass during times when the one-way system (see Section 6.3.4 below) is not being implemented. However, closures cannot be avoided on the L-7551 during construction of the electricity line as there is insufficient space



on the existing public roadway to implement a single lane closure. A road closure will be controlled by way of diversions but local access will be accommodated on the route where possible, with all residents on the route informed of the programme for a road closure. Road closures are to be planned on a rolling basis so when works on a section of the electricity line are complete then roads will re-open. This will ensure roads are not closed for longer than necessary. The appointed contractor will ensure that procedures and works for closures are in accordance with the *Temporary Traffic Management Design Guidance, Third Edition 2019.* Temporary traffic management and roadwork signs will be to Chapter 8 of the *Traffic Signs Manual 2019.*

6.3.2 Diversions

Diversions will be implemented while the electricity line is being constructed along the L-7551 to provide an alternative route for road closures. A sample traffic diversion drawing included in **Appendix D**. Road closures will be sequenced in order to prevent unnecessary delays to the public and allow the contractor to meet the delivery programme. Information and directional signage will be provided to inform the public of road closures and direct them along diversion routes. Local access will be maintained for residents where possible. The contractor will ensure that procedures and works for diversions are in accordance with Section 4.3.3. of the *Guidance for the Control and Management of Traffic at Road Works, Second Edition 2010.* Temporary traffic management and roadwork signs will be to Chapter 8 of the *Traffic Signs Manual 2010.*

6.3.3 Stop/Go Road Management System

A stop/go road management system may be implemented along the L-7551 and L-7556. It is likely to be used on the majority of the electricity line route where width is not available for 2 cars. It is possible that a stop/go road management system is used where sightlines and road width is constrained for HGVs. The contractor will ensure that procedures are in accordance with Section 4.3.3. of the *Guidance for the Control and Management of Traffic at Road Works, Second Edition 2010.* Temporary traffic management and roadwork signs will be to Chapter 8 of the *Traffic Signs Manual 2010.*

6.3.4 One-Way System

A one-way traffic management system could be implemented during the construction phase for the substation. This would limit the instances for vehicles having to pass each other on narrow sections of the existing road. It would also limit the use of the passing bays to the period during which the underground electricity line is being installed in the L-7551. This system would require all vehicles to travel in an anticlockwise direction on the L-7551. They would be required to enter the L-7551 from the L-7556 and exit the L-7551 onto the N61. The details of this approach would be discussed and agreed with the Local Authority in advance of implementation.

7. Mitigation

The traffic impact of the proposed development has been identified as being temporary in nature and associated with the construction stage only. It is still important that any impact is minimised as far as possible and, in light of this, the following mitigation measures have been considered:

• A traffic diversion will be implemented along the L-7551 during the construction phase of the electricity line to maintain access for residents of L-7551.

- Temporary Passing Bays will be constructed on the L-7551 for the duration of construction for deliveries to minimise disruption to residents on the L-7551.
- A Stop/Go system will be implemented on the L-7551 and L-7556 during the construction of the underground electricity line, and potentially for substation deliveries, to minimise disruption to residents.
- Construction traffic and construction vehicle movements on the L-7551 will be limited to minimise
 disruptions and maintain access for residents, unless otherwise agreed in writing with Roscommon
 County Council. Further, deliveries will be scheduled to avoid peak times around the morning and
 evening peak hours. This will avoid HGV traffic arriving during the morning peak hour creating conflicting
 with local residents on their commute/school run. Construction personnel will be encouraged to carpool, or to travel to site in minibuses.
- Signage will be erected in accordance with "Chapter 8 Temporary Traffic Measures and Signs for Roadworks", Department of Transport, Tourism and Sport, August 2019.
- During the construction phase, clear construction warning signs will be placed on the L7551 and L7556 local roads, and the N61 advising the general public as to the presence of the construction site. The site entry point will also be appropriately signed. Access to the construction site will be controlled by on site personnel and all visitors will be asked to sign in and out of the site by security / site personnel. Security gates will be sufficiently set back from the road, so that vehicles entering the site will stop well clear of the private road. Site visitors will all receive a suitable Health and Safety site induction, and Personal Protective Equipment ("PPE") will be worn.
- To control, prevent and minimise dirt on the access route and emissions of dust and other airborne contaminants during the construction works, the following mitigation measures will also be implemented:
 - A water bowser will be available to spray work areas and access tracks, with particular attention given during periods where works coincide with dry periods of weather. This will suppress dust migration from the site.
 - All loads with potential to cause dust nuisance will be covered to minimise the potential for fugitive emissions during transport.
 - o All other stockpiles will be kept damp and covered to prevent windblown dust emissions.
 - The access and egress of construction vehicles will be restricted to designated locations, along defined routes and all vehicles will be required to comply with on-site speed limits.

8. Summary

This Planning-Stage TMP sets out the overall framework for managing the movement of construction and delivery traffic to and from the proposed development site, as well as considering the type of traffic which will be generated.

This Planning-Stage TMP takes into account parts of the guidance which are suitable for this project, namely to include details of the existing conditions and issues relating to the proposed development.

Increased volumes of traffic will be generated by the proposed development during the anticipated 15-18 month construction period. However the overall volumes of traffic generated by the development during the construction period are considered to be quite low..



The planning-Stage TMP sets out a variety of specific mitigation measures that will be implemented during construction which will minimise the impact of the construction traffic on the environment and local communities, the following provides a brief summary of each:

- Limitations on working times and HGV scheduling.
- Site security and signage.
- Measures to control emissions of dust and other airborne contaminants

The Planning-Stage Traffic Management Plan conforms to the Design Manual for Roads and Bridges published by the National Roads Authority (NRA) and "Chapter 8 – Temporary Traffic Measures and Signs for Roadworks", Department of Transport, Tourism and Sport, August 2019.



Appendix A

Indicative Passing Bay Drawings



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	 PLEASE NOTE THE INFORMATION ON THIS PLAN IS A GENERAL GUIDE AND THE ACCURACY THEREFORE CANNOT BE GUARANTEED. NO LIABILITY IS ACCEPTED FOR ANY DISCREPANCY, OMISSION OR DEVIATION AND THE ACTUAL POSITION OF INDIVIDUAL SERVICES MUST BE VERIFIED AND ESTABLISHED ON SITE BEFORE ANY MECHANICAL EXCAVATING PLANT IS USED.
	2. ALL DRAWINGS ARE TO BE READ IN CONJUNCTION WITH ALL RELEVANT SPECIFICATIONS, BILLS OF QUANTITIES, ARCHITECTURAL, SERVICES AND ENGINEERING DRAWINGS.
	3. ANY DISCREPANCIES BETWEEN THESE DOCUMENTS SHALL BE BROUGHT TO THE ATTENTION OF THE ENGINEER.
	4. DRAWINGS ARE NOT TO BE SCALED.
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	P01 24/04/25 ISSUED FOR PLANNING MV PC REV DATE DESCRIPTION BY APP
	PROJECT: MOYVANNAN SUBSTATION AND 110kV GRID CONNECTION
	TITLE: PROPOSED PASSING BAY LAYOUT SHEET 05 OF 05
	client: energia
	ENGINEERING AND ENVIRONMENTAL CONSULTANTS CORK TRALEE LONDON LIMERICK mwp.ie
	DRAWN: CHECKED: APPROVED: M.V. G.McN. P.C. PROJECT NUMBER: DATE: SCALE @ A1:
	24154 MAR. '25 1:250 STATUS DESCRIPTION STATUS: FOR APPROVAI S4
	DRAWING NUMBER: 24154 - MWP -GR-XX-DR-C-5112 P01

Scale : 1:75

DO NOT SCALE FROM THIS DRAWING. USE FIGURED DIMENSIONS IN ALL CASES VERIFY DIMENSIONS ON SITE AND REPORT ANY DISCREPANCIES TO THE DESIGNERS IMMEDIATELY. THIS DRAWING TO BE READ IN CON UNCTION WITH THE DESIGNERS						
© THIS DRAWING TO BE READ IN CONJUNCTION WITH THE DESIGNERS SPECIFICATION. © THIS DRAWING IS COPYRIGHT AND MAY ONLY BE REPRODUCED WITH THE DESIGNERS PERMISSION.						
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4. DRAWINGS ARE NOT TO BE SCALED.						
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P01 24/04/25 ISSUED FOR PLANNING MV PC						
REV DATE DESCRIPTION BY APP PROJECT: MOYVANNAN SUBSTATION AND 110kV GRID CONNECTION						
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CLIENT: energia switched on						
ENGINEERING AND ENVIRONMENTAL CONSULTANTS CORK TRALEE LONDON LIMERICK mwp.ie						
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FOR APPROVAL STATUS:						
DRAWING NUMBER: 24154 - MWP -GR-XX-DR-C-5410 P01						

Appendix B

Traffic Diversion Drawing

Scale : 1:7500

JIEC.		DESIGNERS PERMIS	SION.	
LEGI	<u>END:</u>			
		LAND O	WNERSHIP BOU	JNDAR
_		SITE BO	UNDARY	
		DIVERS	ON(770m)	
		CLOSED) ROAD(720m)	
		STOP/G	O TRAFFIC(400	m)
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ONE WAY SYSTEM

Scale : 1:5000

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NOTES	S:	DESIGNERS PERMISSIO	N.	
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DRAWN:		CHECKED:	APPROVE	mwp.ie
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STATUS	24154 DESCRIPTION	MAR. '25		1:7500 STATUS:
	FOR	APPROVAL		S4
DRAWING	^{в NUMBER:} 154 - MWP	-GR-XX-DR-C-	5114	P01

Appendix C

Sample Schedule of Signs

WK 073 - Loose Chippings

WK 052 - Site Access

Isteach SITE ACCESS

Appendix D

Sample Traffic Management Drawings and Check Sheets

Required Locations for Advance Warning Signs to Roadworks

Level	Longitudinal Safety Zone (m)			
2(i)	45			
2(ii)	60			

Example Layout of an "All Stop" Traffic Operation

Roadworks Type	Speed (km/h)	No. Adv. Warning Signs	Cumulative Distance (m)	Sign Visibility (m)	Longitudinal Safety Zone (m)	Lateral Safety Zone (m)	Max Cone / Lamp Spacing (m)
Level 2 (i) A	80	4	480	90	45	1.2	12/24
Level 2 (i) B	80	3	360	90	45	1.2	12/24
Level 2 (ii) A	100	4	800	120	60	1.2	12/24
Level 2 (ii) B	100	3	600	120	60	1.2	12/24

Summary Criteria

Speed (km/h)	Coned Area Length	Max Traffic Flow (3 min count)	Clear Visibility Before and After Coned Area (m)	
80	80m	10	80	
100	maximum	40 venicies	100	

Lane Widths

Cars only	≥ 2.5m	
HGVs present	≥ 3.0m	
Preferred width	3.3m	
Preferred (with cyclists)	4.0 - 4.3m	-

Example Layout of a Priority Yield Operation

Roadworks Type	Speed (km/h)	No. Signs	Cumulative Distance (m)	Sign Visibility (m)	Longitudinai Safety Zone (m)	Lateral Safety Zone (m)	Max Cone / Lamp Spacing (m)
Level 2 (i) A	80	4	480	90	45	1.2	12/24
Level 2 (i) B	80	3	360	90	45	1.2	12/24
Level 2 (ii) A	100	4	800	120	60	1.2	12/24
Level 2 (ii) B	100	3	600	120	60	1.2	12/24

Summary Criteria

Shuttle Length	Maximum Traffic / 3 mins	Notes		
500m	45			
400m	50	Shall be 2 operators, 2 discs when ≥ 200m		
300m	55			
200m	60	May be 1 operator with remote discs. Operator must be s		
100m	70	100m from each disc and have clear view of each		
20m	25	May be 1 operator, 1 disc		

Lane Widths

≥ 2.5m
≥ 3.0m
3.3m
4.0 - 4.3m

Example Layout of a Stop and Go Operation

ΛWP

Roadworks Type	Speed (km/h)	No. Adv. Warning Signs	Cumulative Distance (m)	Sign Visibility (m)	Longikudinai Safety Zone (m)	Lateral Safety Zone (m)	Max Cone / Lamp Spacing (m)
Level 2 (i) A	80	4	480	90	45	1.2	12/24
Level 2 (i) B	80	3	360	90	45	1.2	12/24
Level 2 (ii) A	100	4	800	120	60	1.2	12/24
Level 2 (ii) B	100	3	600	120	60	1.2	12/24

Signal Heights

10m min 05m mail

Signal Checks

- .
- .
- Batteries Bulb / LEDs operating Signals communicating with each other Housing is in good condition .
- •

Signal Sequence

- Red time is set by Operative Green time is set by Operative •
- .
- Amber 3 seconds .

Summary Criteria

Example Layout for a Temporary Traffic Signals Operation


Example of a Road Opening Works Operation

MWP





Example of a Road Detour and Signage Operation

PLANNED WORKS TRAFFIC MANAGEMENT DESIGN SHEETS

Road Closure	When:	afety Zona +	Lano Wid	th cannot be	achiove	and and		-	- 6,75m - 6.0	7.4m-	-	-3.2	5m-3.7m->	LION		Max Speed	Length of	Traffic		
	2) Alternative	Bafe Method	of Work of	annat ha imr	achieve	d or								8	Method	Limit (km/h)	Works (m)	(veh/hr)	Notes	
	3) Semi Static 4) Convoy Wo	Operation fo	r Minor Ro	ads not app ented	licable, (or								E	Give and Take See 4.5.1	50	50	400	Visibility	
	24/7 W detour gr	here RESID	UAL risks n the Deto	on Road Wo ur even whe	orks Sector active	tion are works ar] 🙀			UHS :	Priority	100	80	850	Speed 50 km/h	Distance 60m
	Working W	ot taking place	uAL risks	on Road Wo	orks Sec	tion are	-				1	-	11	EP 2		No Y		1 in all	60 km/h 80 km/h	70m 80m
	hours gi detour w	eater than o here the RE	n the Deta SIDUAL ris	ur when wor iks on Road	rks are a Works S	ctive ANI Section	D	4	- 5.9m - 5.0 m	n		8HOU 2.7 1F (Sm-1,25m CYCLISTS	5		If used at nig	ht, will requir	e flashing lan	100 km/h nps	100m
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	Maximum 3.	7m	Inne width	hotupon 2	76-0 000	12.0Em		_						1	2 Person	100	500	850	2 Person/	2 Signs
Marshall	Shuttle with m	ainly light ve	hicles and	alternatives	not suita	ible		> Limit Si	huttle len	aths to 50	0m general	ly (+/- at juncti	ions/ specific	reasons)	manic Lights	100	500	IVa	venicie Au	ualeu
Convoy	Select Where:					-	2	> Use Ve	hicle Act	uated Tra	fic Lights					VULNE	RABLE RO	AD USERS	P	
	1) Adequate S 2) Alternative S 3) Semi Static	afety Zone + Safe Method Operations f	of Work c	h cannot be annot be imp oads not ap	achieve plemente plicable	d ed	,	 Notify C 	Gardal if u	using Tra	flic Lights/ S	top-Go boards	s To cater f	or persons 1.8n	with disabilities		Footway D Vulnerab Mi	Desirable min le users' min nimum width	imum width imum width at obstacle	
Semi-Static	> On Minor Ro	ads use for	Surface Dr	essing						(3	2way)		preferr	ed min			Min	nimum width mum width a	at bus stop	4
Management	> For moving s	single vehicle	operation	S							1 5m	-		4 2-		-				
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Worl	ks Name:							La	out Pa	rameters							TDC		
Traffic	Management Se	ection		Note	s			Ad	Advance Distance					Inspections					
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Roadw	orks Speedlimit							Ma	xìmum	Length of Shu	uttle			Buses	School Bus	es Milk I	orries		
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WK 001	Roadworks Ahead		km/h]	WK 071	Uneven Surface		SLDW km/h	07		Hump or Ramp		<u>(m</u>)		WK 001 P010	*	Roadworks End			
RUS 014	No Overtaking		-	RUS 001	Keep Left			W/		Side Road		Oscentt Chiette CONCEALED ENTRANCE		RUS 014 P010		No Overtaking End			
RUS 039- 044	Roadworks Speedlimit		Specify Speed Both Sides	RUS 002	Keep Right			W/ 05		Side Road Right		Oscalt Chaits CONCEALED ENTRANCE		С	A	Cone			
WK 032	Road Narrows Left		m	W 062L	Chevron Let			W1 05		Site Access	6	Desmit Cherite CONCEALED ENTRANCE		WB	["1	Workman Barrier			
WК 033	Road Narrows Right		()	W 062R	Chevron Right			WI 05		Site Access Right	5	Oscoult Cheilte CONCEALED ENTRAHCE		LS	s	teady State Lamp			
WK 034	Road Narrows Both			W183 W184 W185	Barrier Board			WI 07		Soft Verge				LF	٩	Flashing Warning Lamp			
WK 4	Temporary Traffic Signal	-		RUS 060/ 061	Stop and Ge		8G-M=Married Step/Ge SG-A=Auto/Centrolled S delete as appropriate	100 08		Pedestrians Cross Left	5			RR	• <mark>∕</mark>	Rotating Reflector			
WK 061	Flagman Ahead			τL	Temporary Traffic Signal			WI 08		Pedestrians Cross Righ	s			RUS 026	VIELD	Priority Signage			
WK 062	Queues Likely			WК 095	Stop Here or STOP HERE OH RED Red			Pi	E	Pedestrain Barrier	1.21								
WK 094	Road Closed			WK 030	Single Lane			P		Herace Styl Fencing	e								



PROIECT NAME:	JKKS TRAFFIC MA	ANAGEMENT S	Phase:	
Date:	Time:	1).	2).	
TRAFFIC MANACEM	ENT SET UR/ MO	DIFICATION	NEDECTIONS	
1) IKAFFIC MANAGEMI 1–1) Installation Ch	ent SET-UP/ MU	DIFICATION, I	NSPECTIONS	
Does the Traffic Managemer	t conform to the De	sign Layout and	Parameters?	
Have all hazards been addre	ssed in the Traffic M	lanagement Plan	?	
Has allowance been made fo	or the delivery and re	moval of materia	als?	
Have Gardaí been informed	of any Traffic Lights,	/ Stop-Go Board	s in use?	
Have Gardaí been Informed	of Roadworks Speed	Limits being int	roduced?	
2) TRAFFIC MANAGEM	ENT OPERATION I	INSPECTIONS		
2-1) Operation Che	cks	and the state of the		1
Are Safety Zones being kept	clear of operatives,	plant and materi	ials?	
Are all the signs in good cor	idition/ are all cones	in good conditi	on with sleeves?	
Are sign vision lines free fro	m bends, hills/dips	in the road, park	ed vehicles, hedges etc?	
Will the site be safe at night	or in wind, fog, snow	w or rain? (delete	e as appropriate)	
Are all misleading permaner	it signs and road ma	rkings covered?	Colds marticle	
is the carriageway/footway i	being kept clear of m	nud and surplus	equipment?	
Are materials/ plant that are	left on verges or lay	y-bys being prop	perly guarded and lit?	
2-2) Tramic Checks	ant promiser?			
Does Signing and Guarding	meet the (changing)	conditions?		
Are traffic control arrangem	ents working at the	optimum level to	reduce traffic delays?	
If present, are the needs of	cyclists or horse ride	rs incorporated	into the layout?	
2-3) Pedestrian and	Vulnerable Road Us	er Checks		
Have the needs of pedestria	ns and vulnerable ro	ad users been a	ddressed in the layout?	
If pedestrian route blocked,	has a suitable altern	ative route been	provided?	
Are pedestrian routes clearly	/ evident/ indicated?			
If a footway in the road is to	be used, are ramps	to the kerb prov	vided?	
Are pedestrian hazards suffi	ciently GUARDED at	night?		
3) TRAFFIC MANAGEM	ENT CESSATION I	NPECTIONS		
3–1) Works Comple	te Checks			
Have all signs, cones, barrie	rs, and lamps been r	removed?		
Have any covered permanen	t signs been restored	d7	C	
Have Gardal been Informed	mat Speedilmits/ Tra	amic Signals/ Sto	p-Go removed?	
4) EXCEPTIONS REPOR				
(Append attachments as	s necessary)			

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