

From: [Landuse Planning](#)
To: [PLANNING CPU](#)
Subject: Wind Energy Variation; Proposed Variation to the County Donegal Development Plan 2018-2024
Date: Monday 30 May 2022 09:45:14
Attachments: [Proposed Variation to the County Donegal Development Plan 2018-2024.pdf](#)

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Dear Sir/Madam,

Please find attached a copy of TII's observations on the Proposed Variation to the County Donegal Development Plan 2018-2024 (As Varied) in respect of a Wind Energy Policy Framework.

Yours sincerely,
Michael McCormack
Senior Land Use Planner

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by e.mail; windenergycdpvariation@donegalcoco.ie

Dáta | Date
30 May, 2022

Ár dTag | Our Ref.
TII22-118472

Re. Proposed Variation to the County Donegal Development Plan 2018-2024 (As Varied) in respect of a Wind Energy Policy Framework

Dear Sir/Madam,

The Authority welcomes consultation on the Proposed Variation to the County Development Plan, 2018 – 2024, and submits the following observations for the Councils consideration.

The preparation of the proposed Wind Energy Policy Framework for incorporation into the County Donegal Development Plan is welcome. TII appreciates that the availability of a safe, secure and reliable supply of electricity is an essential requirement for Ireland's current and future economic wellbeing. The greening of energy generation via the transition from conventional fossil fuel power generation to sustainable forms of renewable energy supply such as wind and solar power is an essential development if Ireland is to meet its obligations to cut greenhouse gas emissions as we move towards a zero-carbon economy and TII fully supports Government policy in this regard.

In TII's experience, the dispersed nature of renewable energy resources generally has the potential to result in interactions, to varying degrees, with the strategic national road network that require careful consideration and management. This dispersed and rural nature of renewable energy resources requires the development of associated grid connection development. However, it does not appear that the proposed variation has considered the implications of grid connection proposals supporting renewable energy developments and implications for the national road network.

In accordance with the National Planning Framework National Strategic Outcome no. 2 'Enhanced Regional Accessibility', there is a requirement to maintain the strategic capacity and safety of the national road network. This requirement is further reflected in the National Development Plan, the National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities as well as TEN – T Regulation (EU) No 1315/2013.

There is around 99,000km of roads in Ireland, the national road network which caters for strategic inter-urban travel consists of only approx. 5.4% of this. There is a critical requirement to ensure the strategic capacity and safety of this national road network is maintained and significant Government investment already made in the national road network is safeguarded.

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In TII's experience, grid connection proposals predominantly utilise the public road network for routing transmission lines from wind energy developments to connect to existing or proposed substation locations. Utilising the public road network in such a manner is not restricted to lower category lightly trafficked local roads.

The provision of grid connection cabling along the national road network represents a number of significant implications for TII and road authorities in the management and maintenance of the strategic national road network. Grid connections utilising the strategic national road network is a practice that road authorities, including TII, have generally accommodated to date except in specific circumstances. However, experience has resulted in a number of practical difficulties and cost issues arising which include but are not limited to;

- Potential for uneven/differential settlement on existing roads due to backfilling trenches, particularly in locations with softer ground. This raises significant road safety and road maintenance issues.
- Impact on ability and cost of general maintenance and safety works to existing roads, including signing, drainage works, safety barriers, etc., as a result of having high voltage cabling laid on a national road corridor.
- The constraints and additional costs arising to on-line national road improvements and upgrades, including very minor horizontal alignments, where any cabling would have to be relocated in advance of any works, noting in particular the greater likelihood that strategic national roads will require improvement and upgrade as opposed to non-national roads.
- Attendant road safety and traffic management issues on a strategic highly trafficked high speed national road that would not otherwise pertain to more lightly trafficked sections of non-national road.
- The additional costs arising as a result of the foregoing issues are generally the responsibility of the road authority and can compromise the case for undertaking important road improvement and safety works.

In that regard and having regard to the requirement to maintain the strategic capacity and safety of the national road network in accordance with official policy provisions, TII recommends that grid connection proposals should be developed which safeguard the strategic function of the national road network by utilising available alternatives in the first instance, as opposed to the strategic national road network contrary to the provisions of official policy. TII would welcome this matter being considered for incorporation into the Proposed Variation prior to adoption.

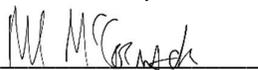
Recommendation

TII would welcome consideration by the Council of the following:

- TII would welcome an objective included in the Proposed Variation to the County Development Plan, 2018 – 2024, in relation to renewable energy and in relation to safeguarding the national road network, indicating that grid connection routing options should be developed to safeguard the strategic function of the national road network in accordance with Government policy by utilising available alternative routes.

It is respectfully requested that the above observations are taken into consideration prior to the adoption of the proposed variation to the Donegal County Development Plan, 2018 – 2024.

Yours sincerely,



Michael McCormack
Senior Land Use Planner