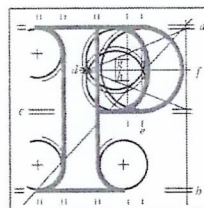


Our Case Number: ABP-317809-23



**An
Bord
Pleanála**

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

Date: 11 October 2023

Re: Proposed Coolglass windfarm and related works
In the townlands of Fossy Upper, Aghoney, Gorreelagh, Knocklead, Scotland, Brennanshill,
Monamantry, Coolglass, Crissard and Kylenebehy, Co. Laois.

Dear Sir / Madam,

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


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

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

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime, please contact the undersigned officer of the Board or email sids@pleanala.ie quoting the above mentioned An Bord Pleanála reference number in any correspondence with the Board.

Yours faithfully,


Evan McGuigan
Executive Officer
Direct Line:

PA09

Executive Officer
Direct Line:

PA04

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64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Evan McGuigan

From: Landuse Planning <LandUsePlanning@tii.ie>
Sent: Monday 2 October 2023 16:24
To: SIDS
Cc: Landuse Planning
Subject: RE: TII submission ABP Ref. PA11.317809_ windfarm and related works in townlands including Fossy Upper and Kylenabehy, Co. Laois_Coolglass Windfarm Ltd., TII ref. TII23-124100
Attachments: TII23-124100 - SID for windfarm & assoc. works, Co. Laois, ABP ref. PA11.317809 _issued 02.10.2023.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir/Madam,

Please find attached a copy of TII's observation on the above application.

Please acknowledge receipt of this submission.

Acknowledgements can be forwarded to landuseplanning@tii.ie.

Regards,

Cliona Ryan
Land Use Planner
Transport Infrastructure Ireland
Phone: +353 (0)1 646 0000
Land Use Planning Email: landuseplanning@tii.ie
Address: [Parkgate Business Centre, Parkgate Place, Parkgate Street, Dublin 8, Ireland, D08 DK10](#)



In accordance with TII's Right to Disconnect policy, if you are receiving this email outside of normal working hours, I do not expect a response or action outside of your own working hours unless it is clearly noted as requiring urgent attention.

De réir pholasáí BIÉ An Ceart gan a bheith Ceangailte, má tá an ríomhphost seo á fháil agat lasmuigh de na gnáthuaireanta oibre, nílim ag súil le freagra ná le gníomh uait lasmuigh de do ghnáthuaireanta oibre féin mura bhfuil sé ráite go soiléir go bhfuil gá gníomhú go práinneach.

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Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag <https://www.tii.ie/about/about-tii/Data-Protection/?set-lang=ga>

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postmaster@tii.ie and delete the original including attachments.

Córas r-phoist BIE: Tá an ríomhphost seo agus aon chomhaid a tharchuirtear leis faoi rún agus beartaithe lena n-úsáid ag an duine aonair nó ag an eintiteas a bhfuil siad dírithe chuige/chuici amháin. Más rud é go bhfuair tú an ríomhphost seo trí bhotún, cuir sin in iúil do postmaster@tii.ie, le do thoil, agus scríos an ríomhphost bunaidh agus aon cheangaltáin.

Strategic Infrastructure Development Section
An Bord Pleanála
64 Marlborough Street
Dublin 1

Email: sids@pleanala.ie

Dáta | Date
02/10/2023

Ár dTag | Our Ref.
TII23-124100

Bhur dTag | Your Ref.
PA11.317809

RE.: Proposed Coolglass windfarm and related works in the townlands of Fossy Upper, Aghoney, Gorreelagh, Knocklead, Scotland, Brennanshill, Monamantry, Coolglass, Crissard and Kylenebehy, Co. Laois.

Dear Secretary,

Transport Infrastructure Ireland (TII) acknowledges referral of the above proposed Strategic Infrastructure Development application on behalf of Coolglass Windfarm Limited (Applicant) for a wind farm comprised of 13 no. turbines, 1 no. substation, 1 no. borrow pit and 2 no. temporary construction compounds, and a Turbine Delivery Route (TDR) to deliver the wind turbine and substation components. It is noted that the submitted EIAR assess the above development and two potential cable routes and a recreational amenity trail. Chapter 1 of the submitted EIAR states that the cable routes and amenity trail will form the subject of a separate planning application.

The site for the proposed windfarm is located south of the M7. The application submitted appears to identify the M7 as the most likely main section of the proposed turbine delivery route (TDR) to turn onto local roads beginning with the R445. The submitted EIAR further appears to identify that works including earthworks, utility diversions, tree clearance and temporary removal of street furniture and signage will be required at Junction 16 of the M7 (Portlaoise (East)), an interchange that is part of Motorway Maintenance and Renewal Contracts (MMaRC) Service Area C and at the roundabout junction of the N80 with the R425.

Project Ireland 2040, National Development Plan 2021 - 2030, sets out the key sectoral priority of maintaining Ireland's existing national road network to a robust and safe standard for users. Government also includes the objective to maintain the strategic capacity and safety of the national roads network, including planning for future capacity enhancements, in National Strategic Outcome 2 of the *National Planning Framework*.

The national road network caters for Ireland's inter-urban and inter-regional transport requirements and gives access to regional and international markets through strategic airport and port locations. As part of this network, the M7 and N80 are part of the national roads network with the N/M7 also part of the TEN-T Comprehensive Network. The Authority's priorities in relation to existing national roads are the maintenance of the existing national road network, including junctions, safeguarding the Exchequer investment in national roads to date.

TII's observations seek to address the safety, capacity and strategic function of the national road network in accordance with TII's statutory functions and the provisions of official policy outlined in the Section 28 *Guidelines Spatial Planning and National Roads Guidelines for Planning Authorities* (2012) and the *EMRA Regional Spatial and Economic Strategy* (RSES). The maintenance and protection of the strategic function of the national road networks and associated junctions are amongst the guiding principles of the transport

strategy of the RSES at *Regional Policy Objective* (RPO) 8.1. RPO 8.2 promotes the management and enhancement of strategic land transport networks, including by travel demand management. In addition, RPO 8.3 requires future development is to be planned and designed in a manner that *inter alia* maximises the efficiency and protects the strategic capacity of the metropolitan area transport network both existing and planned, and further protects and maintains regional accessibility.

Having regard to official policy and in the interests of national road network maintenance and safety TII provides the following observations for the Board's consideration.

1.0 Official National Roads Policy

As noted above, official policy concerning development management and access to national roads is outlined in the Section 28 Ministerial Guidelines *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012).

Section 2.5 of the DoECLG Guidelines sets out policy that seeks to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses (i.e. non-public road access) to national roads, to which speed limits greater than 50 kph apply.

In that regard, the Authority acknowledges that site access to all turbine locations is facilitated via the local road network.

The proposed turbine delivery haul routes indicate utilisation of the national road network.

TII as the national roads authority, sets guidance and standards for traffic and road assessments and construction that may be necessary by reason of proposed development location, scale or typology.

Elements of the national road network are operated and managed by a combination of (Public Private Partnerships) PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities in association with TII. Any crossing of the national road network, including by under or over pass will require prior consultation with TII and compliance with all relevant TII standards as detailed within the TII publications website www.tiipublications.ie.

2.0 National Road Network Maintenance and Safety

In addition to the above, there are a number of operational issues related to the subject windfarm development proposal, in the Authority's opinion, that are required to be resolved to address concerns relating to network maintenance and road safety.

2.1 Proposed Turbine and Construction Haul Routes

Chapter 12 *Traffic* of the submitted EIAR includes 3 no. Technical Appendices as follows: 12.1 *Coolglass Wind Farm Turbine Delivery Route (TDR) Report*; 12.2 *Traffic Survey Data*; and 12.3 *Construction Traffic Management Plan (CTMP)*.

Subsection 12.1.3 of the EIAR is entitled *Consultation and Scoping Responses* and records TII as providing "no response" to EIA Scoping documentation issued in June 2022. It is noted that this "no response" record from TII is repeated at Technical Appendix 2.1 entitled *Scoping Responses* of the submitted EIAR at table A.2 *Summary of Scoping Responses* records 'date contracted' as 17.06.2022 and 'second date contracted' as 17.10.2022 for TII. This table further records 'date response received' as 20.06.2022 and 'summary of concern' as 'no response'.



On the contrary, TII issued a scoping response in June 2022 (Appendix A) and reissued that response in October 2022 under TII ref. TII22-119049. The response was acknowledged by the consultants who prepared the EIAR (SLR) on 27th October 2022. Here follows a record of the correspondence in respect of EIA Scoping:

- 17.06.2022 Automatic TII email acknowledgement issued from info@tii.ie of receipt of initial EIA scoping request from the consultants who prepared the EIAR (SLR) also by email of 17.06.2023 entitled *Coolglass Wind Farm Environmental Impact Assessment Report – Scoping and Consultation* by email 17.06.2023. This acknowledgement as exhibited at pg. 252 of 2631 of Technical Appendix 2.1 of the submitted EIAR.
- 20.06.2022 TII individually acknowledged the receipt of the EIA scoping request from SLR by email.
- 21.06.2022 TII EIA scoping response was returned by email under TII ref. TII22-119049. Copy at Appendix A.
- 20.10.2022 TII EIA scoping response was reissued under TII ref. TII22-119049 on foot of reminder email of EIA scoping request from SLR on 17.10.2022.
- 27.10.2022 TII EIA scoping response was reissued under TII ref. TII22-119049 on foot of reminder email of EIA scoping request from SLR on 26.10.2022. This re-issue email included attachments of the TII email scoping response originally issued 21.06.2022 and re-issued 20.10.2022. Copy of email at Appendix B
- 27.10.2022 SLR acknowledges TII EIA scoping response. Copy of acknowledgment of receipt of EIA scoping response at Appendix C.

TII are concerned that the scoping response issued was not considered in the preparation of the submitted EIAR.

2.1.1 Proposed Turbine Haul Route

A proposed Turbine Delivery Route (TDR) is depicted at Figure 3-5 *Proposed Turbine Delivery Route Overview* which is repeated as Figure 12-5-a. The route identifies 'nodes' where accommodation works appear to be required for the TDR as each identifies a red lined "*proposed development site boundary*". Certain of the 'nodes' i.e. 1, 2 and 4 include parts of the national road network.

Nodes 1 and 2 are identified at Figure 12-5-b and encompass the M7 interchange of Junction 16 (Portlaoise East) with the R445. The entire of this dumb-bell junction is within MMarC Area C and the M7 overbridge at its centre is a TII Structure.

Node 4 is identified at Figure 12-5-d and indicates the utilisation of the R425 that at its roundabout junction with the N80 includes a portion of the "*proposed development site boundary*" indicating works to be undertaken on the N80.

It is further noted that the TDR proposes to utilise the R425 that crosses the M7 by overbridge which is also a TII Structure.

Section 12.3.3 of the submitted EIAR is entitled *Turbine Delivery Route* that identifies turbine competent delivery from Dublin Port.

The 'nodes' description appears in the Swept Path Assessment described at section 7.0 of Technical Appendix 12.1 *Coolglass Wind Farm Turbine Delivery Route (TDR) Report* of the submitted EIAR. Utilisation of Junction 16 of the M7 as described in this report and summarised at Table 2 of that report, appears to require significant works within the motorway area, including earthworks and "*utility diversions*" (nodes 1 and 2). Utilisation of the R425 / N80 roundabout appears to require "*clearance / reinstatement of landscaping*" and utility diversions. Table 3 of this report is *Summary Description of Works* that identifies where "*land required*"

for the TDR. It is noted that land is identified as required at Nodes 1, 2 and 4. Nodes 1 and 2 are the dumb-bell roundabouts of the M7 Junction 16 and within MMaRC Area C. The *Coolglass Wind Farm Turbine Delivery Route (TDR) Report* states that consultations have not been undertaken for the report but that consultation with Laois County Council and TII would be undertaken as part of EIA Scoping. As recorded at the last section 2.1 of this submission, EIA scoping consultation with TII is not considered in the submitted EIAR which is a concern.

Technical Appendix 12.1 *Coolglass Wind Farm Turbine Delivery Route (TDR) Report* of the submitted EIAR at Section 6.0 states “*Modifications that will be required along the route, which include construction of overrun areas, removal of street furniture, etc. are not specifically identified in this report.*” In deference to TII Publications for national road management requirements, identification of works on or in the vicinity of the national road network is required.

Section 12.6 of the submitted EIAR is entitled *Potential Impacts of the Proposed Development* that includes reference to the CTMP submitted as technical Appendix 12.3 and refers the reader to Technical Appendix 12.1 *Turbine Delivery Route (TDR) Report* for “*Impact Cause[d] by Movement of Abnormal Loads*”. In the CTMP is a commitment that “*Any modifications to existing road layouts would be confirmed through a trial run and further surveys, and any modifications or works required to accommodate abnormal loads would be discussed with Laois County and TII as the Roads Authorities and the necessary consents and permits would be obtained in advance of any works or delivery periods.*” Impact associated with the delivery of turbine components is identified in the EIAR as “*....an unavoidable moderate magnitude impact*”. This section of the EIAR does not appear to identify the accommodation works for the TDR as set out at Technical Appendix 12.1. It does not appear that recognition of TII as the national road authority is recorded as part of consideration of mitigation of impact for the proposal in the EIAR or the submitted CTMP.

While both Chapter 12 *Traffic* and Technical Appendix 2.1 *Turbine Delivery Route (TDR) Report* EIAR, confirm abnormal loads, it does not appear to be confirmed whether abnormal weight as opposed to and / or abnormal size loads only will be a feature of the proposed development.

It remains the requirement that any operator who wants to transport a vehicle or load whose weight falls outside the limits allowed by the Road Traffic (Construction Equipment & Use of Vehicles) Regulations 2003, SI 5 of 2003, must obtain a permit for its movement from each Local Authority through whose jurisdiction the vehicle shall travel.

2.1.2 Proposed Construction Haul Route

Development Site Construction Haul Route at subsection 12.3.2 of the submitted EIAR does not identify the national road network for construction traffic, anticipating that HGVs and deliveries will travel from Portlaoise from the north as the largest town in the vicinity of the windfarm site and a smaller percentage travelling from the south.

2.1.3 Construction Traffic Management Plan (CTMP) and Proposed Mitigation

Technical Appendix 12.3 *Construction Traffic Management Plan (CTMP)* repeats the above anticipated construction haul routes at subsection 2.3.2. Subsection 2.3.3 of the CTMP is entitled *Turbine Delivery Route* and describes a TDR from Dublin Port, though the Dublin Tunnel onto the M50 and the N/M7. It should be noted that the M50 is also part of the national road network as is the Dublin Tunnel that has advance permission requirements for larger loads that is identified in subsection 5.1 of Technical Appendix 12.1 *Coolglass Wind Farm Turbine Delivery Route (TDR) Report*, but not identified as part of the mitigation measures of the CTMP.

Section 4.0 *Mitigation Measures* of the submitted CTMP does not identify national road network management requirements, including compliance with TII Publications and obtaining requisite consents, that are specifically required for national road network utilisation, any temporary works and associated signage and reinstatement for construction traffic and the proposed TDR. This omission is a concern for TII and potential impact on the safe and efficient operation of the national road network.

Subsection 12.6.3 *Mitigation Measures* of Chapter 12 *Traffic* of the submitted EIAR refers to the CTMP and a Construction Environmental Management Plan (CEMP) as mitigation at *Wind Farm and TDR*. *Table 12-21 Summary of Predicted Effects (Pre and Post-Mitigation)* does not appear to include effects on safe and efficient operation of the national road network that will be at least subject to temporary impacts by the proposed Turbine Delivery Route that appears to include land take and physical accommodation works including on a motorway that require compliance with TII Publications, co-ordination with national road and motorway management entities and their protocols and specific consents.

Technical Appendix 3.3 of the submitted EIAR is the *Schedule of Mitigation Measures*. Section 8.0 of this Appendix is entitled Traffic and Transportation and again refers to the CTMP and a Construction Environmental Management Plan (CEMP) as mitigation at 8.1 *Wind Farm and TDR*. *Table 8-1 Summary of Predicted Effects (Pre and Post-Mitigation)* is a repeat of Table 12-21.

These omissions are a serious concern for TII and potential impact on the safe and efficient operation of the national road network.

2.2 National Road Network Maintenance and Safety

The national road network being traversed is managed by a combination of Public Private Partnership (PPP) Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities.

The proposed development includes a proposed Turbine Delivery Route (TDR) that appears to require physical works capable of impacting the national road network directly by accommodation works within the network and indirectly by the requirement for co-ordination of component delivery.

It is critical to the safe and efficient operation of the national road network during and after the proposed works that any potential impacts of the proposed works are adequately mitigated.

TII notes with concern no record of the requirement for adherence to, and compliance with, TII Publications procedures nor mitigation of impacts on the national road network including structures and services by commitment to consultation with TII and / or the MMaRC Area C Contractor as part of mitigation at section 12.6 Chapter 12 *Traffic* nor associated Technical Appendix 12.3 the CTMP.

TII considers that arrangements for any other or related works occurring over, under or adjacent to the motorway within the MMaRC area has not been addressed appropriately in the application documentation. It would be expected that intended actions such as earth moving, landscaping and access arrangements to Junction 16 of the M7 and the recorded utility diversions. It is not clear from the information submitted how much of these works will occur within the MMaRC area which itself is a concern for TII and the impact on this critical national road.

TII recommends that that these matters need to be addressed prior to a decision being made on this planning application in the interests of demonstrating that the proposed development will not have a detrimental impact on the capacity, safety, or operational efficiency of the national road network in the vicinity of the site.

To ensure the strategic functions of the national road network, in particular the M7, junction 16 of the M7 and the N80 national roads are safeguarded the following is advised:-

- Demonstration of consideration of TII EIA Scoping Response (copy at Appendix A of this submission).
- Any proposed works to the national road network, including signage, to facilitate turbine component delivery to site shall comply with TII Publications (Standards) in accordance with relevant TII

Publications (Technical) for any work that may impact the national road pavement, structures and infrastructure including drainage and shall be subject to Road Safety Audit as appropriate. Works should ensure the ongoing safety for all road users and prior to any development necessary licenses, approvals or agreements with PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) Companies and local road authorities, as necessary, shall be in place.

- Where temporary works within any MMaRC Contract Boundary are required to facilitate the transport of turbine components or construction traffic to site, the applicant/developer shall contact thirdpartyworks@tii.ie in advance, as a works specific Deed of Indemnity will be required by TII before the works can take place.
- Access for the Turbine Delivery Route preparation and utilisation periods and any subsequent monitoring and maintenance in relation to any works proposed, including temporary and permanent signage, landscaping or groundworks that affect the national road and associated junctions in terms of operational requirements, timetabling, etc. will require prior consultation with the MMaRC Network C Contractors and fulfilment of requirements to complete their 3rd party protocols, via the relevant road authorities and TII.
- The developer should consult with all PPP Companies, MMaRC Contractors and road authorities over which the haul route traverses to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is maintained.
- TII requests referral of all proposals agreed between the road authority, PPP Concessions and MMaRC Companies and the applicant impacting on national roads. Mitigation measures identified by the applicant should be included as conditions in any decision to grant permission.
- Any damage caused to the pavement of the existing national road due to movement of abnormal loads (e.g. tearing of the surface course) shall be rectified in accordance with TII Pavement Standards and details in this regard shall be agreed with the Road Authority prior to the commencement of any development on site.
- Separate structure approvals/permits and other licences may be required in connection with the proposed development, including where temporary modification to the road network may be required.

It is appropriate that specific mitigation and monitoring commitments for potential impact on the national road network especially at the M7 and N80 in the vicinity of the proposed Wind Farm site and included within the “*proposed development site boundary*” are reflected in the submitted EIAR where appropriate, including at Chapter 12 *Traffic*, and Technical Appendices 12.1 *Coolglass Wind Farm Turbine Delivery Route (TDR) Report*, 12.3 *Construction Traffic Management Plan (CTMP)* and 3.3 *Schedule of Mitigation Measures*.

3.0 Further information recommendation to ensure the maintenance of the safety, efficiency, and capacity of the National Road Network

Based on the information submitted with the planning application, in particular proposed mitigation measures for the national road network contained in the proposed CTMP and at Chapter 12 *Traffic* of the EIAR, TII are unable to ascertain or evaluate national road interactions within the TII maintained area, and all associated infrastructure assets including e.g. lighting, gantries, signage, substations, boundary treatments, drainage arrangements, construction access and future maintenance arrangements.

TII recommends that the following matters are required to be addressed prior to a decision being made on this planning application in the interests of demonstrating that the proposed development will not have a detrimental impact on the capacity, safety, or operational efficiency of the national road network in the vicinity of the site:

1. The applicant shall submit revised documentation and plans demonstrating the requirements of TII Publications and have regard to the extents of the Motorway Maintenance and Renewal Contracts (MMaRC) Maintenance Area C in the proposed development. As part of this exercise, the Authority recommends the submission of a drawing that identifies the extents of the MMaRC area C relative to proposed works alongside a schedule of the TII Publications applicable and intended method of compliance with TII Publications.
2. An updated Construction Traffic Management Plan (CTMP) and, as necessary the Construction Environmental Management Plan (CEMP) is required that shall demonstrate the following in relation to proposed Turbine Delivery Route accommodation works and other proposed works in the vicinity of the M7 to ensure compliance with TII Publications requirements and mitigation of potential impact on the national road network:-
 - a) a pre-construction survey along the length of the proposed works over the extents of the motorway boundary;
 - b) methodology for the preparation and submission of, a post-construction survey along the length of the proposed works the extents of the motorway boundary;
 - c) details demonstrating compliance of works on, or in the vicinity of the motorway with TII Publications;
 - d) record of consultation with Motorway Maintenance and Renewal Contracts (MMaRC) Maintenance Area C, via TII and the relevant road authority;
 - e) detailed information on traffic management, including signage (static and VMS) to ensure the strategic function of the national road network is protected; and
 - f) record of works specific indemnities, Section 53 consent and arrangements for third party access as arise following consultation with thirdpartyworks@tii.ie.
3. An update to the proposed Construction Traffic Management Plan (CTMP) and, as necessary the Construction Environmental Management Plan (CEMP) are required that shall include the following to ensure compliance with TII Publications requirements and mitigation of potential impact on the national road network:-
 - a) details demonstrating compliance of proposed works to the national road network, including signage, to facilitate construction and component delivery traffic with TII Publications;
 - b) an abnormal load assessment. Where abnormal loads fall outside height, weight or length loads allowed by the Road Traffic (Construction Equipment & Use of Vehicles) Regulations 2003, SI 5 of 2003. Where abnormal weight and size loads are proposed, with specific reference to structures on national roads on any proposed haul or component delivery route, all structures should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal size and weight load proposed, where relevant.
 - c) consultation with TII Bridge Management Section to ensure that national road structures are not adversely affected and to ensure adherence to required standards and procedures;
 - d) consultation with all relevant PPP Companies, MMaRC Contractors and road authorities over which the component delivery route traverses to ascertain any operational requirements such as delivery timetabling, etc. to ensure that the strategic function of the national road network is maintained;
 - e) copies of any proposals agreed between the road authority, PPP Concessions and MMaRC Companies and the applicant impacting on national roads; and

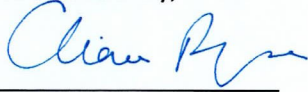
f) consultation with thirdpartyworks@tii.ie where temporary works within national road network maintenance boundaries are required to facilitate construction and component delivery traffic to site, as a works specific Deed of Indemnity may be required by TII before the works can take place.

Conclusion

TII recommends resolution of the above matters in advance of any decision on the subject application.

Please acknowledge receipt of this submission.

Yours sincerely,



Cliona Ryan
Land Use Planner

Appendix A Copy of TII EIA Scoping Response by email 21.06.2022 under TII ref. TII22-119049

Appendix B Copy of TII email of 27.10.2022 to SLR that attached TII EIA Scoping Response of 21.06.2022 and its re-issued by email 20.10.2022 under TII ref. TII22-119049

Appendix C Copy of Acknowledgment of TII EIA Scoping Response by email 27.10.2022

From: INFO
Sent: Tuesday 21 June 2022 09:10
To: 'egoulding@slrconsulting.com'
Subject: TII Ref: TII22-119049 - EIAR Scoping - Coolglass Wind Farm. Your Ref: 501.00727.00006.

Dear Ms. Leiker,

Thank you for your correspondence of 17 June 2022 regarding the above EIAR scoping exercise. The position in relation to your enquiry is as follows.

Transport Infrastructure Ireland (TII) will endeavour to consider and respond to planning applications referred to it, given its status and duties as a statutory consultee under the Planning Acts. The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidelines, as outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). Regard should also be had to other relevant guidance available at www.TII.ie.

The issuing of this correspondence is provided as best practice guidance only and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals, following the examination of any valid planning application referred.

National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national roads network. In addition, Chapter 7 'Enhanced Regional Accessibility' of the 'National Development Plan, 2021 – 2030', sets out the key sectoral priority of maintaining Ireland's existing national road network to a robust and safe standard for users. This requirement is further reflected in the publication of the National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 'Spatial Planning and National Roads Guidelines for Planning Authorities'.

With respect to EIAR scoping issues, the recommendations indicated below provide only general guidance for the preparation of an EIAR, which may affect the national road network.

The developer/scheme promoter should have regard, inter alia, to the following:

- Consultations should be had with the relevant Local Authority/National Roads Design Office, with regard to locations of existing and future national road schemes.
- TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development.
- The developer should assess visual impacts from existing national roads.
- The developer should have regard to any EIAR/EIS and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area. The developer should, in particular, have regard to any potential cumulative impacts.
- The developer, in preparing EIAR, should have regard to TII Publications (formerly 'DMR'B and the 'Manual of Contract Documents for Road Works'). It is noted that the EIAR Scoping Report makes reference to the DfT DMRB and this will require updating.

- The developer, in preparing EIAR, should have regard to TII's Environmental Assessment and Construction Guidelines, including the 'Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes' (National Roads Authority (NRA), 2006).
- The EIAR/EIS should consider the 'Environmental Noise Regulations 2006' (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see 'Guidelines for the Treatment of Noise and Vibration in National Road Schemes' (1st Rev., NRA, 2004)).
- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site, with reference to impacts on the national road network and junctions of lower category roads with national roads. In relation to national roads, TII's 'Traffic and Transport Assessment Guidelines' (2014) should be referred to in relation to proposed development, with potential impacts on the national road network. It is noted that TII's TTA Guidelines have not been referenced in the EIAR Scoping Report. The scheme promoter is also advised to have regard to Section 2.2 of the TII's TTA Guidelines, which addresses requirements for sub-threshold TTA. Any improvements required to facilitate development should be identified. It will be the responsibility of the developer to pay for the costs of any improvements to national roads to facilitate the private development proposed, as TII will not be responsible for such costs.
- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required.
- In the interests of maintaining the safety and standard of the national road network, the EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network.
- TII recommends that that applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Where abnormal 'weight' loads are proposed, separate structure approvals/permits and other licences may be required in connection with the proposed haul route and all structures on the haul route through all the relevant County Council administrative areas should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal 'weight' load proposed.

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

The applicant/developer should also consult with all PPP Companies, MMaRC Contractors and road authorities over which the haul route traverses, to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is safeguarded.

Additionally, any damage caused to the pavement on the existing national road, arising from any temporary works due to the turning movement of abnormal 'length' loads (e.g., tearing of the surface course, etc.), shall be rectified in accordance with TII Pavement Standards and details in this regard shall be agreed with the Road Authority prior to the commencement of any development on site.

- Any grid connection and cable routing proposals should be developed to safeguard proposed road schemes, as TII will not be responsible for costs associated with the future relocation of cable routing, where proposals are catered for in an area of a proposed national road scheme. In that regard, consideration should be given to routing options, use of existing crossings, depth of cable laying, etc.

In the context of the existing national roads 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 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'.

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.

The provision of 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 and TII is of the opinion that grid connection cable routing should reflect the foregoing provisions of official policy. Therefore, TII advises that grid connection cable routing should seek to utilise available alternatives, as opposed to the strategic national road network, contrary to the provisions of official policy.

Other consents or licences may be required from the road authority for any trenching or cabling proposals crossing the national road. TII requests referral of all proposals agreed and licensed between the road authority and the applicant, which affect the national road network.

Cable routing should avoid all impacts to existing TII infrastructure, such as traffic counters, weather stations, etc. and works required to such infrastructure shall only be undertaken in consultation with and subject to the agreement of TII. Any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network.

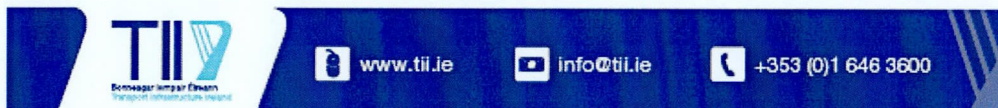
Notwithstanding, any of the above, the developer should be aware that this list is non-exhaustive, thus site and development specific issues should be addressed in accordance with best practise.

I hope that this information is of assistance to you.

Yours sincerely,

Alban Mills

Senior Regulatory and Administration Executive



Appendix B Copy of TII email of 27.10.2022 to SLR that attached TII EIA Scoping Response of 21.06.2022 and its re-issued by email 20.10.2022 under TII ref. TII22-119049

From: INFO
Sent: Thursday 27 October 2022 11:43
To: 'goreilly@slrconsulting.com'
Cc: 'egoulding@slrconsulting.com'
Subject: TII Ref: TII22-119049 - EIAR Scoping - Coolglass Wind Farm, Co. Laois.
Attachments: TII Ref: TII22-119049 - EIAR Scoping - Coolglass Wind Farm. Your Ref: 501.00727.00006.; TII Ref TII22-119049 - EIAR Scoping - Coolglass Wind Farm Co. Laois. Your Ref Your Ref 501.00727.00006. - resend.msg

Dear Mr. O'Reilly,

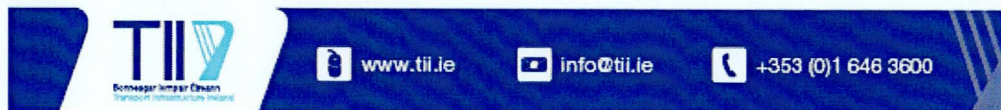
Thank you for your further correspondence of 26 October 2022 regarding the above. The position in relation to your enquiry is as follows.

I wish to advise that Transport Infrastructure Ireland's (TII's) position remains as set out in its initial response of 21 June 2022, which is attached for your convenience and which was reissued to you on 20 October 2022, which is also attached for your convenience.

I hope that this information is of assistance to you.

Yours sincerely,

Andrew Moore
Regulatory and Administration Executive



From: Gerald O'Reilly <goreilly@slrconsulting.com>
Sent: Wednesday 26 October 2022 15:25
To: INFO <Information@tii.ie>
Subject: RE: Coolglass Wind Farm Environmental Impact Assessment Report – Scoping and Consultation

You don't often get email from goreilly@slrconsulting.com. [Learn why this is important](#)

CAUTION: This email originated from outside of TII. Do not click links or open attachments unless you recognise the sender and are sure that the content is safe.

Dear Sir/Madame

Further to my email below, we have not yet received a response from you. You should note that the date indicated in the letter for your response is the **4th November 2022**. It would be appreciated if you could provide a response before that date, as we will be progressing the design of wind farm.

Regards;

Gerald O'Reilly.

Gerald O'Reilly

Associate Planner-Environmental & Social Impact Assessment

+44 28 6634 8584

goreilly@slrconsulting.com

SLR Consulting Limited

Clockwise, River House, 48 High Street, Belfast, BT1 2BE

From: Gerald O'Reilly <goreilly@slrconsulting.com>

Sent: 17 October 2022 14:48

To: info@tii.ie

Cc: Crystal Leiker <cleiker@slrconsulting.com>

Subject: Coolglass Wind Farm Environmental Impact Assessment Report – Scoping and Consultation

Dear Sir / Madam,

Please find attached the following items for consultation for the above named project

- Consultation Letter
- Site layout plan
- Site location plan
- Scoping Report

This letter is being issued to you as part of the consultation process for the EIAR. As part of the consultation process, we would be interested in receiving any comments you may have on the proposed development, relevant to your area of expertise, before 4th November 2022 in writing or in email to: goreilly@slrconsulting.com

The coordinates of the proposed wind turbines are:

Turbine	X	Y
1	655032.3	687984.7
2	655375.3	688631.6
3	655674.6	688369.3
4	656166.5	688287.6
5	656876	688333
6	656562.8	687954.9
7	657154.4	687730.8
8	657544.7	684470.8
9	657391.3	684900.4
10	656561.5	684216.1
11	656622.8	683576.1
12	656977.7	684061.7
13	657268	683883

Yours Sincerely,

Gerald O'Reilly

Associate Planner-Environmental & Social Impact Assessment

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The Prince's
Responsible
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Race at Work Charter signatory

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From: Gerald O'Reilly <goreilly@slrconsulting.com>
Sent: Thursday 27 October 2022 11:56
To: INFO
Cc: Edward Goulding
Subject: RE: TII Ref: TII22-119049 - EIAR Scoping - Coolglass Wind Farm, Co. Laois.

Thank you for your replies.

Regards

Gerald.

Gerald O'Reilly

Associate Planner - Environmental & Social Impact Assessment

+44 28 6634 8584

goreilly@slrconsulting.com

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Clockwise, River House, 48 High Street, Belfast, BT1 2BE

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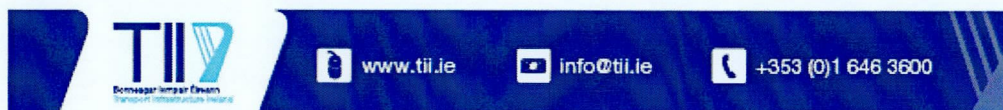
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Gerald O'Reilly

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Clockwise, River House, 48 High Street, Belfast, BT1 2BE

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