Our Case Number: ACP-322845-25



Transport Infrastructure Ireland Land Use Planning Parkgate Business Centre Parkgate Street Dublin 8 D08 DK10

Date: 07 July 2025

Re: Proposed development of 11 wind turbines and ancillary development

within the townlands of Ballynamullagh, Kilmurry, Coolree, Killyon, Mulgeeth and Drehid, County

Kildare (www.drehidwindfarmSID.ie)

Dear Sir / Madam,

An Coimisiún 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 Commission 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 Coimisiún Pleanála when they have been processed by the Commission.

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

If you have any queries in the meantime please contact the undersigned officer of the Commission. Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

DC.

Lauren Murphy **Executive Officer**

Direct Line: 01-8737275

PA09

Teil Glao Áitiúil

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64 Sráid Maoilbhríde Baile Átha Cliath 1 D01 V902 64 Marlborough Street Dublin 1 D01 V902

Lauren Murphy

From:

Landuse Planning < LandUsePlanning@tii.ie>

Sent:

Friday 27 June 2025 16:40

To:

SIDS

Subject:

TII submission to Case Ref. PA09.322845_North Kildare Wind Farm Limited, TII ref.

TII25-131949

Attachments:

TII25-131949 - Drehid Wind Farm SID application Co. Kildare - Case ref.

PA09.322845 issued 27.06.2025.pdf

Categories:

Lauren

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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

Tel: +353 (0)1 646 0000 Email: landuseplanning@tii.ie



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An Coimisiún Pleanála (Strategic Infrastructure Division) 64 Marlborough Street Dublin 1

By email: sids@pleanala.ie

Dáta | Date

Ár dTag | Our Ref.

Bhur dTag | Your Ref.

27 June 2025

TII25-131949

PA09.322845

RE:

Proposed development of 11 wind turbines and ancillary development within the townlands of Ballynamullagh, Kilmurry, Coolree, Killyon, Mulgeeth and Drehid, Co. Kildare

Applicant: North Kildare Wind Farm Limited.

Dear Sir /Madam,

Transport Infrastructure Ireland (TII) acknowledges receipt of referral of the above application concurrent with an associated application for the proposed development of a 110kV substation and associated works, An Coimisiún Pleanála case ref. VA09.322843 on behalf of the same applicant.

T!I welcomes and is supportive of proposals aimed at achieving *Project Ireland 2040* National Strategic Outcomes (NSO) including *NSO 8 Transition to a Low Carbon and Climate Resilient Society* and *NSO 9 Sustainable Management of Water and other Environmental Resources.*

TII consider that individual projects should proceed where they are complementary to the requirements of official policy concerning maintaining the strategic capacity and safety of the national road network in accordance with NSO 2 Enhanced Regional Accessibility. Therefore, in the case of the above planning application, the Authority will rely on the Coimisiún to abide by official policy in relation to development on/affecting national roads as outlined in DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), subject to the following matters:

TII observes that the proposed windfarm development and associated grid connection are together the "project" described in the submitted shared EIAR. TII reiterates that the national road network includes its interchanges and works to those interchanges are subject to observance of official national roads policy, demonstration of TII Publication compliance and co-ordination with relevant national road network management entity.

Notwithstanding that proposed site access is from the local road network, TII notes in *Chapter 13 Traffic and Transportation*, subsection 13.6.5 Construction Mitigation Measures and Appendix 13.1 includes for the Turbine Delivery Route (TDR) that:

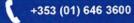
- The M4 is proposed as part of the proposed TDR and,
- "minor accommodation works" are proposed for Junction 9 (Enfield) of the M4 to facilitate the TDR.

TII advises that Junction 9 of the M4 and adjacent carriageway and national road network services are maintained and managed under the M4/M6 Kinnegad-Kilcock Motorway PPP Contract. Kildare

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County Council is not the road authority for the M4/M6 Kinnegad-Kilcock Motorway PPP Contract Area.

Til notes with concern that the submitted Construction Environmental Management Plan (CEMP) and associated Construction Traffic Management Plan, (Appendix 3.2 of the submitted EIAR) is to be updated by the appointed contractor in advance of the works and is to be agreed with Kildare County Council and An Garda Síochána. The document does not acknowledge or record the requirement for observance of official national roads policy, TII Publication compliance nor necessity for co-ordination with the PPP Contractor. This despite the requirements for the use of and alterations to, the motorway network.

This concern is heightened as these matters were highlighted in EIAR scoping response issued by TII in May 2024 (TII ref. TII24-127792) in respect of "proposed Drehid Wind Farm and grid connection, County Kildare, a revision of previously permitted Kildare Reg. Ref. 181534 (appeal ref. ABP-306500-20)". Receipt of the TII EIAR scoping response is recorded in *Chapter 5 EIA Scoping, Consultation and Key Issues* of the submitted EIAR.

TII advises the following recommendations:

- 1. Any Mitigation measures identified by the applicant should be included as conditions in any decision to grant permission.
- 2. An updated Construction Traffic Management Plan (CTMP) shall be prepared and agreed with Kildare County Council, An Garda Síochána and TII, prior to the commencement of development. The matters to be addressed in the CTMP relating to national road network maintenance and road safety shall include:
 - Demonstration that Compliance with TII Publications (Standards) in accordance with relevant TII Publications (Technical) will be required for any work that may impact the national road pavement, structures and infrastructure including drainage.
 - ii. Any proposed works to the national road network, including signage, to facilitate construction traffic shall comply with TII Publications and shall be subject to Road Safety Audit as appropriate. Works should ensure the ongoing safety for all road users and prior to any development necessary licenses, approvals or agreements with PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) Companies and local road authorities, as necessary, shall be in place.
 - iii. Any damage caused to the pavement of the existing national road due to the turning movement of abnormal 'length' 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.
 - iv. Separate structure approvals/permits, and other licences may be required in connection with the proposed works, including where temporary modification to the road network may be required.
 - v. In association with the above the applicant/developer shall 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.

The foregoing matters and their reflection as part of the proposed development is essential to avoid detrimental impact on the capacity, safety, or efficiency of the national road network, is in the

interests of sustainable development, and the promotion of an integrated approach to land use and transportation planning.

Please acknowledge receipt of this submission.

Yours faithfully,

on behalf of

Land Use Planning Unit