

The Secretary
An Coimisiún Pleanála
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by e.mail; sids@pleanala.ie

Dáta | Date

13 November 2025

Ár dTag | Our Ref.

TII25-133452

Bhur dTag | Your Ref.

Re: Strategic Infrastructure Development Application for Construction of a 9 turbine wind energy development (Cooloo Windfarm) and all associated works, Galway

ACP case ref. PAX07.323761

Dear Sir / Madam,

The Authority acknowledges receipt of referral of the above proposed Strategic Infrastructure Development Application on behalf of Neoen Renewables Ireland Limited. Transport Infrastructure Ireland (TII) acknowledges that the subject development proposal can contribute to achieving the national target of renewable energy generation and reduction in greenhouse gas emissions.

In that regard, TII welcomes and is supportive of proposals aimed at achieving the transition to a low carbon and climate resilient economy, increasing renewable energy generation and enhancing energy security giving effect to National Strategic Outcome no. 8 of the National Planning Framework 'Transition to a Low Carbon and Climate Resilient Society'.

Within the foregoing context, it is proposed to address the proposed development in relation to the provisions of official policy and in relation to national road network maintenance and safety to ensure the proposed development can proceed complementary to the requirements of official policy concerning maintaining the strategic capacity and safety of the national road network in accordance with National Strategic Outcome no. 2 of the National Planning Framework 'Enhanced Regional Accessibility'.

1. Official Policy

The Board will be aware that 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 the application documentation submitted indicates no direct access requirements to the national road network in the first instance.

2. National Road Network Maintenance and Safety

In addition to the above, there are a number of operational issues related to the subject development proposal, in the Authority's opinion, that are required to be considered to address network maintenance and road safety prior to any decision on this planning application.

2.1 Proposed Turbine Component Delivery Route

Section 15.1.9 of the submitted EIA outlines an 'Abnormal Load Route Assessment'. Port of entry is identified as Galway and the turbine component haul route indicates that the N6, M6, M18, M17 and N83 national roads are utilised. Minor and temporary works are proposed to facilitate turbine component delivery to site.

EIA Section 15.1.9 'Abnormal Load Route Assessment' identifies the requirement for a temporary over-run area in third party land on the southwest corner of the N63 / R332 junction in order to accommodate the abnormally sized loads.

EIA Section 4.5.2.1.1 confirms that the temporary access road will only be used for the transportation of abnormally sized loads, which will be delivered with a Garda escort and transient traffic management vehicles operated by the haulage company. The road will not be available for any other traffic and will be closed off and opened only for the delivery of the abnormally sized loads. Upon the completion of the construction phase, the temporary road will be covered with a layer of topsoil and reseeded and will only be used again in the unlikely event that an oversized delivery was required for wind turbine maintenance purposes.

In the first instance, the national road network is managed by a combination of PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities. The applicant/developer should consult with all PPP Companies, MMaRC Contractors and road authorities over which the haul routes traverse 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 authorities, 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. Where temporary works within any MMaRC Contract Boundary are required to facilitate the transport of any abnormal loads to site, the applicant/developer shall contact thirdpartyworks@tii.ie in advance, as a works specific Deed of Indemnity will be needed by TII before the works can take place.

In the interests of clarification, any proposed works to the national road network to facilitate turbine component delivery to site 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 the local road authorities shall be in place.

All national road and ancillary overground/underground assets shall be subject to proper undamaged reinstatement and properly certified to the relevant standards in accordance with the assets' functions together with any working widths/depths which they require.

Any damage caused to the pavement of the existing national road due to the turning movement of abnormal 'length' loads (eg. 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.

In addition to the foregoing, TII outlines the following matters for the Commissions consideration in the assessment of the subject proposal concerning the proposed works for the temporary over-run area in third party land on the southwest corner of the N63 / R332 junction in order to accommodate the abnormally sized loads identified in EIAR Section 15.1.9 'Abnormal Load Route Assessment';

- The proposed temporary works to the N63 / R332 junction in order to accommodate abnormally sized loads are for a temporary period only to facilitate turbine component delivery and thereafter temporary works shall be removed and lands reinstated following completion of the construction phase of development in the interests of road safety and adherence to the provisions of official policy.
- The proposed temporary works to the N63 / R332 junction should be closed off with a temporary safety barrier when not in use for turbine component delivery, as it could be misinterpreted by drivers as part of the roadway. Pending completion of construction, the temporary works shall thereafter be permanently closed and the lands reinstated.
- Any damage caused to the pavement on the existing national road at the access to the N63 / R332 junction temporary works, due to the turning movement of abnormal loads (eg. 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.
- A Road Safety Audit shall be undertaken where warranted and all recommendations of the Road Safety Audit shall be incorporated into final designs for construction and the requirements to implement the recommendations of the Road Safety Audit included as a condition on any permission granted.
- In the interests of road user safety, all works to the national road shall comply with TII Publications (formerly NRA DMRB); technical design standards for national roads.

2.2 Structures

While the application documentation indicates the turbine component haul route and addresses abnormal 'length', 'width' or 'height' loads in that context, it is unclear if the application includes provision for any abnormal 'weight' loads related to either turbine component delivery to site or related to proposed substation components.

In relation to this matter, ID 11 of Table 15-1a of the EIAR Submitted 'Issues raised by TII in relation to the Proposed Project and Responses' outlines the following

'The proposed haul routes are identified in this Chapter 15 of the EIAR. While it is proposed that the delivery stage of the Proposed Project will involve abnormally large loads, the axle loadings will not exceed accepted limits. A program of pre-delivery condition and structural assessment of the route is however proposed, as set out in the Traffic Management Measures, included set out in Section 15.1.12.5.'

In the interests of clarity and for the Commissions consideration, 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.

With specific reference to national road structures on any proposed haul route, all structures should be checked by the applicant/developer to confirm that all the structures can accommodate the proposed loading associated with the delivery of development components to site where the weight of the delivery vehicle and load exceeds that permissible under the Road Traffic Regulations.

While an abnormal load is defined as anything above 46 tonnes and below 180 tonnes, any load above 180 tonnes, represents an 'Exceptional Abnormal Load' ('EAL'). All structures to be crossed will need a full structural assessment by the developer in accordance with TII Publications AM-STR-06048 to verify that they can sustain any 'EAL' load safely and without any damage. Reference should be made to Department of Transport Circular RW18 of 2024 ('Exceptional Abnormal Loads') in that regard.

Full details of the transportation of all Abnormal Loads and all 'Exceptional Abnormal Loads' associated with the subject development shall be agreed with all planning and road authorities along all proposed haul routes prior to the commencement of any development.

2.3 Grid Connection Routing

Section 12.4.1.1 'Accelerate Renewable Electricity Generation' of the Climate Action Plan 2024 (CAP24) outlines the objective of reaching 80% of electricity demand from renewable sources by 2030 through a range of measures, including; *'All relevant public bodies will carry out their functions in a manner which supports the achievement of the renewable electricity targets, including, but not limited to, the use of road and rail infrastructure to provide a route for grid infrastructure where this is the optimal solution'*.

Consistent with CAP24, for all renewable energy developments requiring grid connection to the national grid, TII recommends that a full assessment of all route alternatives for grid connection takes place, including alternatives to public road, where appropriate. In TII's experience, grid connection accommodated on national roads has the potential, inter alia, to result in technical road safety issues such as differential settlement due to backfilling trenches and can impact on ability and cost of general maintenance, upgrades and safety works to existing national roads. TII respectfully requests that the Commission assess the proposed grid routing to determine that the 'optimal solution' results.

TII also refers the Commission to Department of Transport Circular RW 07 of 2025 and the 'Interim Guidance to Road Authorities (placement of Medium or High Voltage electricity assets)' which can be accessed at; <https://www.gov.ie/en/publication/ece06-electricity-transmission-infrastructure-development-roads-sector-engagement-framework-interim-guidance/>.

The 'Interim Guidance' which, as outlined in the Circular, are issued pro tem until the development of any procedures for the planning, regulation, construction and management of Medium or High Voltage cables under public roads by the 'HV Forum' and the conclusion of any outcomes from the Private Wires Consultation undertaken by the Department of Energy, Climate and Communications.

Section 4.3.2.1 of the EIAR submitted indicates that upon decommissioning of the proposed Wind Farm, the 110kV substation will remain in situ and form part of the national grid infrastructure and as the proposed grid connection is 110kV, TII also considers that the 'Electricity Transmission Infrastructure Development – Roads Sector Engagement Framework' also included in Department of Transport Circular RW 07 of 2025 applies

Section 3.5.4 of the EIAR acknowledges that the proposed grid connection will be subject to a separate planning application but that it has been assessed within the submitted EIAR. The Section also details the 'Alternative Grid Connection Cabling Route Options' assessed. It is noted that underground grid connection proposals to both the Cloon 110kV Substation and the Cashla 220kV Substation are considered.

In relation to specific proposals included in the submitted EIAR, the underground cabling route measures approximately 21km of which approximately 18.2km is located within the public road corridor. The on-road sections of the Proposed Grid Connection underground cabling route travels along 4.2km of the N63 National Secondary Road,

Table 15-26 of EIAR submitted indicates significant impact to the national road concerned identifying closure over 42 construction days and Table 15-27 identifying a diversion route adding 7.1km to associated trips.

Appendix 15-2 Traffic Management Plan Section 5 outlines that prior to the construction of the Proposed Grid Connection, the final diversion routes that will be used during the construction of the various sections of the cabling route will be discussed and agreed with Galway County Council.

In considering the proposed grid connection routing TII requests that the Commission assesses the proposed grid routing to determine that the 'optimal solution' results. TII notes the following points of concern resulting in significant impact to the N63, national road;

- The proposed underground cable routing measures approx. 21km of which approximately 18.2km is located within the public road corridor, of which 4.2km is proposed to be placed in the N63, national secondary road,
- Drawings included in Appendix 4-4 'Grid Connection Drawings indicate up to 6 proposed joint bays included in the N63 national road reservation. (*Drawings include the text that 'Exact location of cable/joint bay in the road curtilage to be subject to ESB/EirGrid specifications and agreement with Galway County Council'*).
- The impacts to the N63, national road, are significant and the EIAR identifies closure of the national road over 42 construction days and Table 15-27 identifies a diversion route adding 7.1km to associated trips.
- Further, in relation to the 'Alternative Grid Connection Cabling Route Options' assessed to the Cloon 110kV Substation and the Cashla 220kV Substation, it is noted that no 'loop-in' connections appear to be considered or alternative overhead lines. In that regard, it is noted that the EIAR Scoping associated with the subject application had initially identified a 'loop-in' connection to the Cloon-Lanesborough line.

Table 15-1a of the EIAR submitted 'Issues raised by TII in relation to the Proposed Project and Responses' does not appear to address this alternative nor acknowledge that an alternative grid connection proposal was outlined during the EIAR Scoping process.

It is unclear why a 'loop in' connection to the overhead line was not proposed in the instance of the subject application given the proximity of the overhead line to the subject windfarm site, as opposed to laying grid connection in approx. 18.2km of public road network, including the 4.2km section proposed in the N63, national road, and associated joint bays with the potential to significantly impact this strategic national road asset in the region.

TII respectfully requests that the above considerations are taken into account in any subsequent application for grid connection routing. TII also respectfully requests that the Commission assess the proposed grid routing to determine that the 'optimal solution' results taking account of the above considerations and having regard to the provisions of official policy in relation to national road network maintenance and safety to ensure the proposed development can proceed complementary to the requirements of official policy concerning maintaining the strategic capacity and safety of the national road network in accordance with National Strategic Outcome no. 2 of the National Planning Framework 'Enhanced Regional Accessibility'.

Where an 'optimal solution' for grid routing impacts the national road network, the following principles apply;

- Any cable routing should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, embankments, drainage, structures, 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.
- The Commission will also note that Section 5.5 of TII Publications DN-STR-03012 (Design for Durability) requires that electricity cables 10kV or greater shall not be located on or over road structures, including buried structures. Where electricity cables 10kV or greater are required to cross a road structure they shall pass below the structure, at a sufficient depth so as to remove the potential for any impacts on the structure during operation.

2.4 Greenways

In relation to any Greenway or Active Travel proposals in the vicinity of the proposed works, consultation with Galway County Councils own internal project and/or design staff is recommended.

Conclusion

It is requested that the above matters are taken into consideration prior to any decision on the subject application.

In the interests of clarification, no part of this submission shall be construed as TII giving consent to access or alter any national road infrastructure assets including drainage regimes, vehicle restraint and safety systems, ducting, HDD crossings, structures, etc.

In the event that any damage is caused by any development works to the national road or associated assets, overground or underground, costs arising to fully remediate all impacted infrastructure assets to TII Publications standards and requirements will be pursued by or on behalf of TII.

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

Yours faithfully,



Michael McCormack
Senior Land Use Planner