

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

By email: sids@pleanala.ie

Dáta | Date

11 March 2026

Ár dTag | Our Ref.

TII26-135157

Bhur dTag | Your Ref.

PAX09.324055

RE: 10 year permission for Derrynadarragh wind farm comprising of 9 no. wind turbines, onsite 110kV substation, turbine delivery route and a grid connection route located across various townlands in County Kildare, Offaly and Laois

Applicant: Dara Energy Limited

Dear Sir /Madam,

Transport Infrastructure Ireland (TII) acknowledges receipt of referral of the above proposed windfarm, grid connection and turbine delivery route application on behalf of Dara Energy Ltd.

TII 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 set out in the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) concerning maintaining the strategic capacity and safety of the national road network in accordance with *NSO 2 Enhanced Regional Accessibility*.

As the Commission is aware, the national road network consists of carriageways and includes its interchanges and associated services, including drainage and structures. Any works that temporarily or permanently interact with the national road network are subject to observance of official national roads policy, demonstration of TII Publications compliance and co-ordination with relevant national road network management entity.

TII observes that Chapter 14 *Traffic and Transportation* of the submitted EIAR in section 14.4 *Proposed Project* describes “routes” associated with the proposed development; grid connection, construction haul route, and turbine delivery route (TDR). The construction haul route and TDR interact with the national road network, including motorway (M6 and N52 named). Subsection 14.4.5 *Turbine Delivery Route* (TDR) of the submitted EIAR describes that the TDR will require traffic management interventions including abnormal load permitting and temporary accommodation works to identified locations, including on the national road network (also identified in the Route Survey Review (RSR) in Appendix 2.3 of the submitted EIAR).

Appendix 14 *Traffic and Transportation* of the submitted EIAR includes *Appendix 14.1 – Traffic Management Plan* repeats the identification of the national roads network as part of the proposed construction haul route and TDR including the requirement for traffic management interventions

including abnormal load permitting and temporary accommodation works to identified locations, including on the national road network (“*node reference 13*” M6 Slip Road / N52 Roundabout).

TII advises that elements of the national road network, including the N/M6 and likely associated routes from landing port to proposed wind farm site comprise national road and motorway network maintained, managed and operated sections under Motorway Maintenance and Renewal Contracts (MMaRC) and by Public Private Partnerships (PPP) Concessions and not local roads authorities.

TII determines that the proposed development includes use of, and alterations to, the national road network. TII notes that submitted project information, including EIA Chapter 14 *Traffic and Transportation* and Appendix 14 *Traffic and Transportation* of the submitted EIA holding Appendix 14.1 – *Traffic Management Plan* does commit to “...an objective to always maintain the strategic capacity and safety of the M6 and N52 carriageways, cognisant of the National Development Plan, 2021 - 2030, with key sectoral priorities for maintaining the national road network to a robust and safe standard for users” at section 4.2 *Turbine Delivery Route*. However, specific Traffic Management Plan mitigations proposed, do not record nor commit to the requirements of observance of official national roads policy, TII Publications (Technical and Standards) compliance nor necessity for co-ordination with MMaRC and PPP Contractors who manage and operate parts of the national road network on behalf of TII. Only local roads authorities and “*local residents*” are recorded for “*consultation*” in EIA subsection 14.7.1.3 *Turbine Component Delivery Mitigation* and the proposed final TMP is only recorded in EIA 14.7 *Mitigation Measures*, subsection 14.7.1.1 *Main Wind Farm Site* to be agreed with local authorities and the An Garda Síochána prior to commencing construction.

TII observes that Appendix 14 *Traffic and Transportation* of the submitted EIA includes Appendix 14.1 – *Traffic Management Plan* which is a proposed TMP referring to a “*final TMP*” to be prepared post consent by the appointed contractor.

Therefore, in the case of the above planning application, the Authority will rely on the Commission 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 makes the following recommendations:

1. prior to the commencement of development, a final Traffic Management plan (TMP) shall be submitted for the written agreement of relevant County Councils subject to the written agreement of TII. The matters to be addressed in the TMP relating to national road network maintenance and road safety shall include:
 - i. 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.

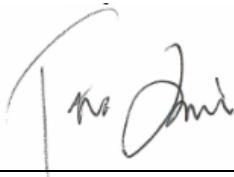
- iv. Separate structure approvals/permits, and other licences may be required in connection with the proposed works, including where temporary modification to the road network may be required.
- v. In association with the above the applicant/developer shall consult with all PPP Companies, MMaRC Contractors 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.

For clarity, EIAR Chapters 5 *EIA Scoping and Consultation* and 14 *Traffic and Transportation*, both dated January 2026, record that “no response” to EIA scoping request was received from TII despite an EIAR Scoping response issuing from TII in December 2024 (TII ref. TII24-129783). TII is concerned that the applicant is not recording stakeholder interactions appropriately.

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,

A handwritten signature in black ink, appearing to read 'T. O. O.', is written above a horizontal line.

**on behalf of
Land Use Planning Unit**