Our Case Number: ACP-323985-25

Your Reference: Drumdowney Solar Farm Limited

An Coimisiún Pleanála

HWP
hw planning
04 MAR 2026
RECEIVED

HW Planning
C/o Conor Frehil
5 Joyce House
Barrack Square
Ballincollig
Co. Cork

Date: 02 March 2026

Re: Proposed 110kV Gas Insulated Switchgear (GIS) electricity substation, associated grid connection and all ancillary site works. (www.drumdowneysubstation.ie)
Located in Rathpatrick (townland), County Kilkenny.

Dear Sir / Madam,

Enclosed for your information is a copy of 5 submissions received by the Commission from the following in relation to the above mentioned proposed development:

Column1	Customer
1	Development Applications Unit
2	HSE National Environmental Health Service
3	Kilkenny County Council
4	Transport Infrastructure Ireland
5	Uisce Éireann

The Commission hereby considers it appropriate to invite you to make a submission on the observations received in relation to the application. Please be advised that any response to the Commission's invitation should not contain any additional reports or supplementary reports and should be confined to the issues raised in the observations received by the Commission. Any submission in relation to the above must be received by the Commission within 4 weeks from the date of this letter (i.e. not later than **30th of March 2026**).

If you have any queries in relation to the matter 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.

Teil **Tel** (01) 858 8100
Glao Áitiúil **LoCall** 1800 275 175
Facs **Fax** (01) 872 2684
Láithreán Gréasáin **Website** www.pleanala.ie
Ríomhphost **Email** communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Yours faithfully,

PP LD

Honor Caird Marren
Executive Officer
Direct Line: 01-8049315

VA10

Teil	**Tel**	(01) 858 8100
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64 Marlborough Street
Dublin 1
D01 V902

Our Case Number: ACP-323985-25

An Coimisiún Pleanála

HSE National Environmental Health Service
St. Dympnas Hospital
Athy Road
Co. Carlow
R93 DE62

Date: 27 February 2026

Re: Proposed 110kV Gas Insulated Switchgear (GIS) electricity substation, associated grid connection and all ancillary site works. (www.drumdowneysubstation.ie)
Located in Rathpatrick (townland), County Kilkenny.

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 or email sids@pleanala.ie quoting the above mentioned An Coimisiún Pleanála reference number in any correspondence with the Commission.

Yours faithfully,

PP JD

Honor Caird Marren
Executive Officer
Direct Line: 01-8049315

VA11

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Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Our Case Number: ACP-323985-25

An Coimisiún Pleanála

Kilkenny County Council
County Hall
John Street
Kilkenny
Co. Kilkenny

Date: 27 February 2026

Re: Proposed 110kV Gas Insulated Switchgear (GIS) electricity substation, associated grid connection and all ancillary site works. (www.drumdowneysubstation.ie)
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PP JD

Honor Caird Marren
Executive Officer
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D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Our Case Number: ACP-323985-25

An Coimisiún Pleanála

Transport Infrastructure Ireland
c/o Michael McCormack
Parkgate Business Centre
Parkgate Street
Dublin 8
D08 DK10

Date: 27 February 2026

Re: Proposed 110kV Gas Insulated Switchgear (GIS) electricity substation, associated grid connection and all ancillary site works. (www.drumdowneysubstation.ie)
Located in Rathpatrick (townland), County Kilkenny.

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

PP JD

Honor Caird Marren
Executive Officer
Direct Line: 01-8049315
VA11

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64 Marlborough Street
Dublin 1
D01 V902

Our Case Number: ACP-323985-25

An Coimisiún Pleanála

Development Applications Unit
Department of Housing, Local Government and Herit
Government Offices
Newtown Road
Wexford
Co. Wexford
Y35 AP90

Date: 27 February 2026

Re: Proposed 110kV Gas Insulated Switchgear (GIS) electricity substation, associated grid connection and all ancillary site works. (www.drumdowneysubstation.ie)
Located in Rathpatrick (townland), County Kilkenny.

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Yours faithfully,

PP JD

Honor Caird Marren
Executive Officer
Direct Line: 01-8049315
VA11

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64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Jonathan Dunne

From: SIDS <sids@pleanala.ie>
Sent: Friday 27 February 2026 15:45
To: planning@water.ie
Subject: ACP-323985-25 -110kV Gas Insulated Switchgear (GIS) electricity substation, associated grid connection and all ancillary site work. Rathpatrick (townland), County Kilkenny.
Attachments: ACP-323985-25 - Submission Acknowledgment.pdf

To whom it may concern,

Please find a letter acknowledging your recent submission in respect of the above.

Should you have any queries – please do not hesitate to contact us.

Kind Regards
Jonathan Dunne

Our Case Number: ACP-323985-25

An Coimisiún Pleanála

Uisce Éireann

Emailed

Date: 27 February 2026

Re: Proposed 110kV Gas Insulated Switchgear (GIS) electricity substation, associated grid connection and all ancillary site works. (www.drumdowneysubstation.ie)
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More detailed information in relation to strategic infrastructure development can be viewed on the Commission's website: www.pleanala.ie.

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Yours faithfully,

PP JD

Honor Caird Marren
Executive Officer
Direct Line: 01-8049315

VA11

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Ríomhphost	**Email**	communications@pleanala.ie	D01 V902	D01 V902

An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage

Your Ref: ACP-323985-26
Our Ref: SID-KK-2025-039
(Please quote in all related correspondence)

25 February 2026

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Via email to: laps@pleanala.ie

Re: Notification under the Planning and Development Act, 2000, as amended.

Proposed Strategic Infrastructure Development (SID): Drumdowney Solar Farm Limited substation and associated loop-in / loop-out grid connection

A chara,

I refer to correspondence received in connection with the above. Outlined below are heritage-related observations/recommendations of the Department under the stated heading(s).

Archaeology

It is noted that the planning application documentation includes a desk-based Archaeological Impact Assessment (AIA), which was carried out in relation to the proposed development by Rubicon Archaeology Ltd (dated 4 December 2025).

The proposed development is located in proximity to a number of Recorded Monuments, which are subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1930–2014. The AIA acknowledges that there is a potential that previously unknown sub-surface archaeological features or deposits may be present within the proposed development site. If present, these would be directly impacted by the proposed development.

It is noted that the assessment has been informed by a walkover survey only. There has been no advance prospection, such as archaeological geophysical survey or advance

archaeological test excavation, which would provide greater clarity as to the potential presence of sub-surface archaeological features or deposits. If such material is present, then additional mitigation measures to ensure the preservation in situ or preservation by record (i.e. full archaeological excavation) of such discoveries will be necessary. The Department advises that this can be addressed by the inclusion of an appropriate condition if the development is permitted.

The Department, therefore, advises that the following should be included as a condition of any grant of permission. Note these recommended conditions align with Sample Conditions C3, C5 and C6 as set out in OPR Practice Note PN03: Planning Conditions (October 2022), with appropriate site-specific additions/adaptations based on the particular characteristics of this development and informed by the findings of the AIA.

Archaeological Requirements:

1. All mitigation measures in relation to archaeology and cultural heritage as set out in the Archaeological Impact Assessment (dated 4 December 2025) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.

2. The developer shall engage a suitably qualified archaeologist (licensed under the National Monuments Acts) to carry out a pre-development Archaeological Geophysical Survey and a pre-development Archaeological Test Excavation at all areas of proposed ground disturbance (including temporary measures such as construction compounds or crane bases) and to submit an archaeological impact assessment report for the written agreement of the planning authority, following consultation with the National Monuments Service of the Department, in advance of any site preparation works or groundworks, including site investigation works/topsoil stripping/site clearance and/or construction works.

    a. The Archaeological Geophysical Survey must be carried out under licence from the National Monuments Service of the Department and in accordance with an approved method statement. Having completed the work, the archaeologist shall submit a written report to the National Monuments Service of the Department and the Planning Authority describing the results of the Archaeological Geophysical Survey.

    b. The archaeologist shall liaise with the National Monuments Service of the Department to establish — based on the results of the Archaeological Geophysical Survey — the appropriate scope of the Archaeological Test Excavation to adequately

characterise the character and extent of any potential sub-surface archaeological material within the development site.

c. The report on the Archaeological Test Excavation shall include an archaeological impact statement and mitigation strategy. Where archaeological material is shown to be present, avoidance, preservation in-situ, preservation by record (archaeological excavation) and/or monitoring may be required.

d. Any further archaeological mitigation requirements specified by the planning authority, following consultation with the National Monuments Service of the Department, shall be complied with by the developer.

e. No site preparation and/or construction works shall be carried out on site until the archaeologist's report has been submitted to and approval to proceed is agreed in writing with the planning authority.

3. A suitably qualified archaeologist shall be retained to advise on and establish appropriate Exclusion Zones around the external-most elements of vulnerable Heritage Assets located within or in close proximity to the development site (as identified in the Archaeological Impact Assessment (dated 4 December 2025) or by any subsequent investigations associated with the project).

a. Exclusion Zones shall be fenced off or appropriately demarcated for the duration of construction works in the vicinity of the monuments. The location and extent of each Exclusion Zone and the appropriate methodology for fencing off or demarcating at each location shall be agreed in advance with the National Monuments Service of the Department and the planning authority.

b. No groundworks of any kind (including but not limited to advance geotechnical site investigations) and no machinery, storage of materials or any other activity related to construction will be permitted within Exclusion Zones.

4. The Construction Environment Management Plan (CEMP) shall include the location of any and all archaeological or cultural heritage constraints relevant to the proposed development as set out in Archaeological Impact Assessment (dated 4 December 2025) and by any subsequent archaeological investigations associated with the project. The CEMP shall clearly describe all identified likely archaeological impacts, both direct and indirect and all mitigation measures to be employed to protect the archaeological or

cultural heritage environment during all phases of site preparation and construction activity.

5. The planning authority and the National Monuments Service of the Department shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any archaeological investigative work/excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.

Reason: To ensure the continued preservation (either *in situ* or by record) of places, caves, sites, features or other objects of archaeological interest.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at: manager.dau@npws.gov.ie, or to the following address:

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90

Yours faithfully,

Julie Sullivan
Assistant Principal
Development Applications Unit
Administration

Uisce Éireann's Ref: PN25000034926

Uisce Éireann
Bosca OP 448
Oifig Sheachadta na
Cathrach Theas
Cathair Chorcaí

Uisce Éireann
PO Box 448
South City
Delivery Office
Cork City

www.water.ie

Planning Ref: Proposed development of a 110kV Gas Insulated Switchgear (GIS) electricity substation and grid connection

Planning Authority: An Coimisiún Pleanála

Issue Date: 23 February 2026

Development Location: Rathpatrick, County Kilkenny

Development Description:

Drumdowney Solar Farm Limited substation and associated loop-in / loop-out grid connection.

A Chara,

Uisce Éireann (UÉ) has reviewed the plans and particulars submitted with the application and has the following observations;

There are no Uisce Éireann assets in the vicinity of the proposed development. it is anticipated that there will be no adverse impact on any assets or sources belonging to Uisce Éireann.

Queries relating to the terms and observations above should be directed to planning@water.ie

Yours sincerely,

Dermot Phelan

Dermot Phelan
Connections and Developer Services

Advisory Note(s):

*Uisce Éireann does not permit build over of its assets. Separation distances from public infrastructure, as per Uisce Éireann's Standards Codes and Practices must be achieved. It is the applicant's responsibility to submit a diversion enquiry to Uisce Éireann Diversions Section (diversions@water.ie) prior to construction, where a potential build over of public assets is in question and/or where the applicants proposals cannot achieve separation distances from public infrastructure as per UÉ Standards & Codes of Practice.

** Protection of drinking water source(s) from potentially adverse impacts is a priority for Uisce Éireann. It is Uisce Éireanns current policy to maintain safe and secure drinking water supplies

Stiúrthóirí / Directors: Jerry Grant (Cathaoirleach / Chairperson), Niall Gleeson (POF / CEO), Gerard Britchfield, Douglas Millican, Michael Nolan, Patricia King, Eileen Maher, Cathy Mannion, Paul Reid, Michael Walsh.
Oifig Chláraithe / Registered Office: Teach Colvill, 24-26 Sráid Thalbóid, Baile Átha Cliath 1, D01 NP86 / Colvill House, 24-26 Talbot Street, Dublin, Ireland D01NP86
Is cuideachta ghníomhaíochta ainmnithe atá faoi theorainn scaireanna é Uisce Éireann / Uisce Éireann is a designated activity company, limited by shares.
Cláraithe in Éirinn Uimh.: 530363 / Registered in Ireland No.: 530363.

UE / LH / OP448 / 1024

and ensure that development will not give rise to any deterioration in water quality. Development proposals shall not impact public drinking water sources and/or abstraction point(s). It is also a requirement of the Water Framework Directive that waters used for the abstraction of drinking water are protected to avoid deterioration in quality. Development proposals shall not impact public drinking water sources and/or abstraction point(s).

Any person discharging trade effluent** to a sewer, must have a Trade Effluent License issued pursuant to section 16 of the Local Government (Water Pollution) Act, 1977 (as amended). More information and an application form for a Trade Effluent License can be found at the following link: https://www.water.ie/business/trade-effluent/about/ . Trade effluent is defined in the Local Government (Water Pollution) Act, 1977 (as amended).

Uisce Éireann does not permit surface waters into the public sewer network.

KILKENNY COUNTY COUNCIL

Planning and Development Act 2000 (as amended)

Planning and Development (Strategic Infrastructure) Act 2006

Planning Authority report in accordance with the requirements of

Section 182(A) of the Planning and Development Act 2000 (as amended)

An Coimisiúin Pleanála Ref. No.:	**VA10.323985**
Applicant:	**Drumdowney Solar Farm**
Agents:	**HWP Planning**
Description of Development	**Proposed development of a 110kV Grid Connection for Solar Farm**
Site location:	**Townlands of Atateemore or Blackneys, Ballyhobuck, Ballyrahan, Carriganurra, Charlestown, Davidstown, Drumdowney Lower, Drumdowney Upper, Gorteens, Grogan, Kilmurry, Nicholastown, Rathpatrick, Scartnamoe, Tinvaucoosh and Treanaree in County Kilkenny**

The proposed development:
The proposed development will comprise a 10-year permission for the following:-

1) A 110kV Gas Insulated Switchgear (GIS) electricity substation with two -storey GIS substation building, single -storey Independent Power Producer (IPP) control room building, High Voltage (HV) electrical equipment and associated infra structure (to include transformer, lightning protection masts, back -up diesel generator, fire/blast wall, telecoms pole, perimeter security fencing, security lighting, water and drainage infrastructure, and temporary construction compound) to connect to and serve solar farm development;
2) Associated loop -in / loop out grid connection infrastructure to connect into existing 110kV overhead transmission line (including underground 110kV cabling, 2 No. new interface towers and decommissioning of ca. 15m of existing 110kV overhead line);
3) Construction and operational access from public road L34142;
4) All ancillary site development, landscaping and earthworks. Development subject to application forms part of grid connection and access arrangements which will facilitate the connection of proposed Drumdowney Solar Farm to the national grid.

An existing EirGrid 110kV overhead line linking Great Island substation to Waterford substation crosses proposed development site and this can be used to 'loop' the solar farm into the national electricity transmission network. There are two overhead lines connecting Great Island to Waterford. The Drumdowney Solar Farm project would be connecting into just one of these.

The 2 no. new interface towers are required to achieve this. The Interface towers will be 16m in height and approximately 5.75m in width.

The construction of the Interface Towers will be as follows will be approximately 15 metres apart, therefore the similar length of the existing 110kV Great Island to Waterford overhead line will need to be decommissioned. The proposed substation will connect into each interface tower via an underground 110kV cable. This cable is comprised of 3 no. power ducts, 2 no. telecom ducts and 1 no. earth continuity duct. The cables to each interface tower are 68 and 83 metres in length.

33kV underground interconnector cables which are required to transport the electricity generated at each land parcel of the the Drumdowney Solar Farm to the proposed substation form part of the planning application for the Drumdowney Solar Farm which recently received notification of grant of planning permission from Kilkenny County Council.

Proposed to provide a temporary construction compound west of proposed substation, accessed from entrance from L34142. Temporary compound will include the following facilities:

- Canteen space to facilitate all workers during the peak period;
- Office space with lighting, heating and internet facilities;
- Toilets, adequate welfare facilities for construction staff in accordance with the relevant statutory Health & Welfare guidelines;
- Parking space for light and heavy vehicles; Designated skips and temporary storage areas.

This will involve the reinstatement of all other excavated materials and associated landscaping works. It will include the replacement of topsoil in disturbed ground areas such as access tracks and the removal of the construction compound and other temporary work areas.
The proposed landscaping provides for the removal of c.87 metres of hedgerow to facilitate the proposed development. Approximately 531 metres of existing hedgerow will be bolstered (Type 1) as part of the development, with an additional 287 linear metres of new hedgerow planting (Type 2) as per the submitted Landscape Mitigation Plan.

A Natura Impact Statement (NIS) and an Ecological Impact Assessment have been prepared in respect of the proposed development which also considers the proposed solar farm. EIA Screening took place which screened out the necessity to undertake an Environmental Impact Assessment Report for both the substation and also the concurrent solar farm application(including grid connection) reg. ref. 2560391. This recieved notification to grant planning permission from Kilkenny County Council on the 13/02/2026.

The operational lifetime of the solar farms is assumed to be 40 years. However, following the decommissioning of solar farms, envisaged that substation (and underground cable grid connection) remain in situ as a valuable functioning and operational part of electricity transmission network managed by the Transmission Systems Operator, EirGrid.

Planning Process including Pre-Planning

The planning application for the solar farm was submitted to Kilkenny County Council on 27th June 2025.

A Request for Further Information was issued by the Council on 21st August 2025 and the Applicant responded to this on the 12th December 2025 Notification to grant planning pmerission issued on the 13th of February 2026. Early in project development phase, identified the proposed substation and grid connection may constitute 'strategic infrastructure development' having regard to provisions of Planning and Development (Strategic Infrastructure) Act 2006 and established case precedent on such matters.

The applicant entered into pre-application consultations with An Coimisiún Pleanála on 15th August 2025. An Coimisiún confirmed opinion that proposed development meets definition of 'strategic infrastructure development' as defined in legislation by means of a formal notice dated 24th October 20251.

An Coimisiún Pleanála has also confirmed, in closing the pre-application consultation process under Section 182E of the Planning and Development Act 2000, as amended, proposed grid connection: "would be strategic infrastructure within the meaning of transmission as per the definitions provided in the Planning and Development Act 2000.

Application received by An Coimisiún Pleanála on 30th December 2025.

Construction

The duration of the construction works be confirmed and agreed with local authority prior to construction. Construction programme for the Drumdowney Solar Farm (including the substation and grid connection) estimated to be a total of 24 months.

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PART II – INTERNAL REFERRALS

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PART IV – SUPPORTING REPORTS

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PART VI - CONDITIONS, COMMUNITY GAIN AND BONDS

PART VII OVERALL CONSIDERED VIEW

PART I – SITE LOCATION AND DEVELOPMENT DESCRIPTION

Site Location

The application site area is 1.75 hectares and comprises of a layout which extends across two agricultural fields, with proposed underground cabling and grid connection masts extending in a third field to the east under the existing transmission network lines. The site is located in the townland of Rathpatrick. The L3414 local road is located to the south, with the proposed development to be accessed for both the construction and operational phases by means of a single entrance from the L3414 to/from the west. The wider national road network including the N25 and N29 are located to the west and northwest. There is a service station off the N29 to the southwest and some dwelling houses and farm yards to the northwest and north of the substation site. The nearest dwelling house is c.185 metres to the nearest part of the proposed substation compound.

Proposed Development

The proposed development comprises of:

1) A 110kV Gas Insulated Switchgear (GIS) electricity substation with two -storey GIS substation building, single -storey Independent Power Producer (IPP) control room building, High Voltage (HV) electrical equipment and associated infrastructure (to include transformer, lightning protection masts, back -up diesel generator, fire/blast wall, telecoms pole, perimeter security fencing, security lighting, water and drainage infrastructure, and temporary construction compound) to connect to and serve solar farm devel opment;

2) Associated loop -in / loop out grid connection infrastructure to connect into an existing 110kV overhead transmission line (including underground 110kV cabling, 2 No. new interface towers and decommissioning of ca. 15m of existing 110kV overhead line);

3) Construction and operational access from the public road L34142;

4) All ancillary site development, landscaping and earthworks. The development subject to this application forms part of grid connection and access arrangements which will facilitate the connection of the proposed Drumdowney Solar Farm (Kilkenny County Counci l Reference 25/60391) to the national grid. A Natura Impact Statement (NIS) has been prepared in respect of the proposed development.

it is envisaged that the substation may remain in situ as valuable functioning infrastructure on the national electricity transmission network subject to appropriate land agreements.

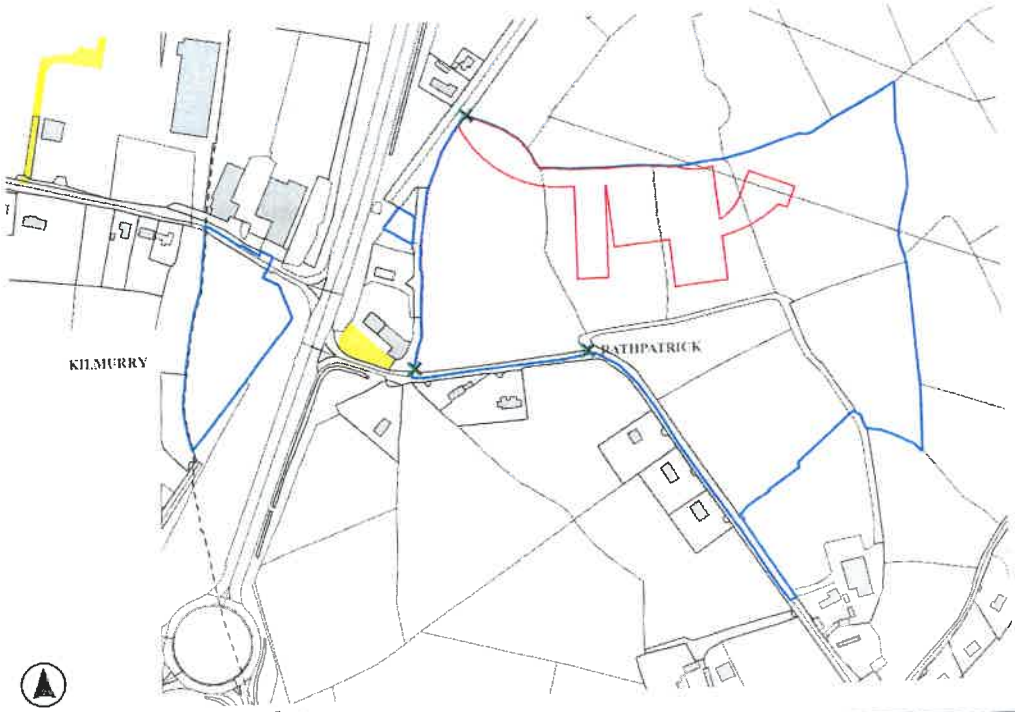

Fig: Site Location Map

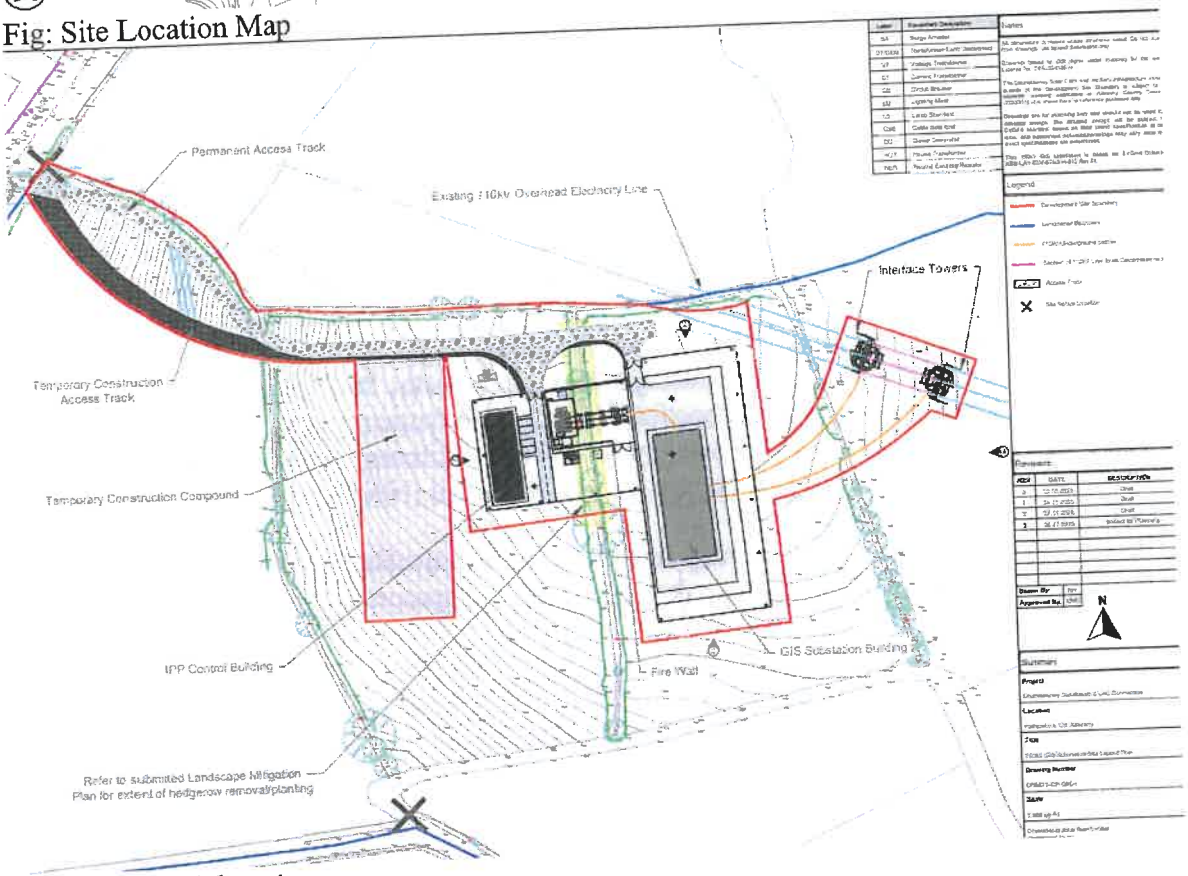

Fig: Onsite Substation

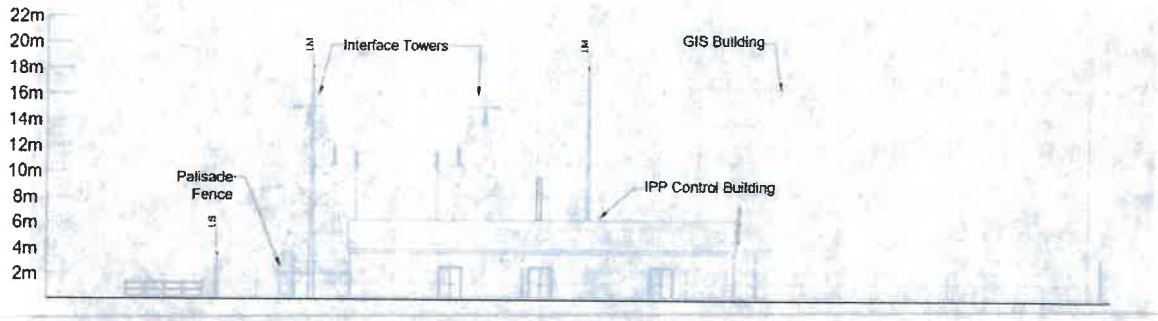

Fig: Long Elevation of Buildings and Structures

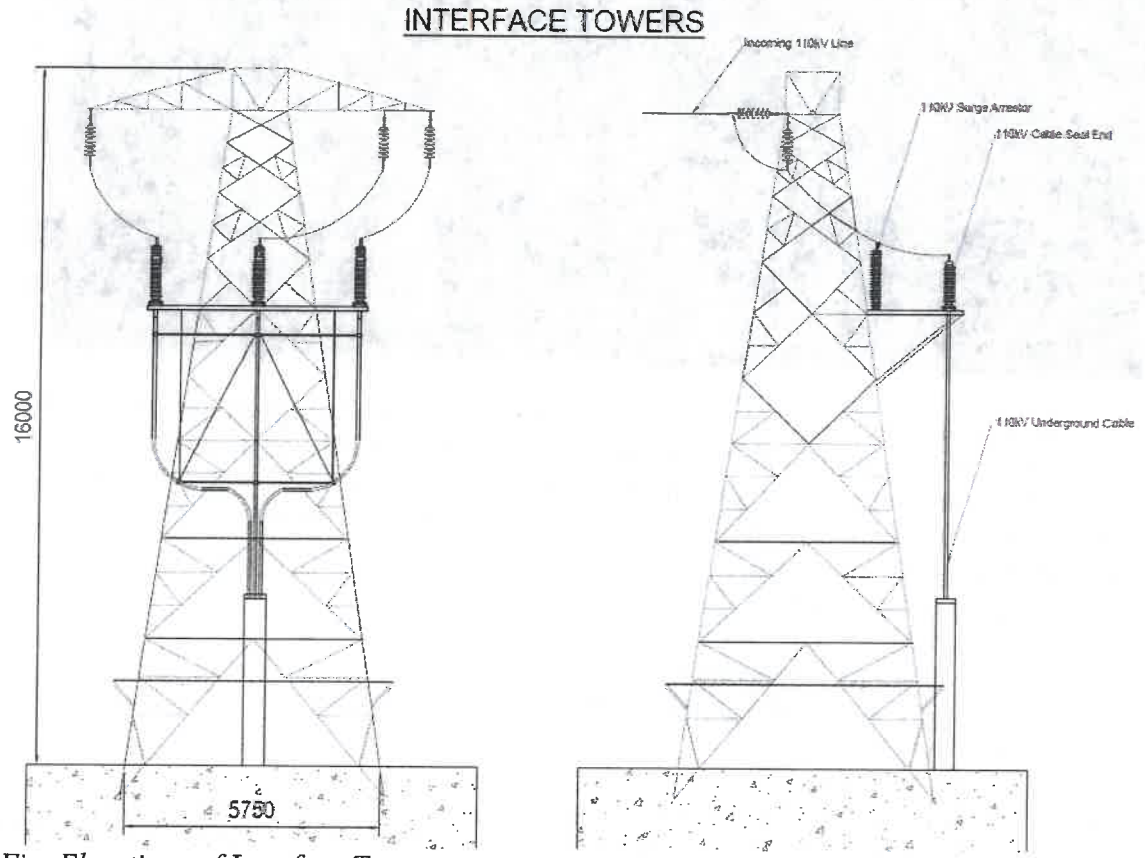

Fig: Elevations of Interface Towers



The substation will be based on EirGrid design specifications. The substation compound will consist of a two-storey GIS substation building, single-storey IPP Control Room building, HV electrical equipment and associated infrastructure including palisade fences and concrete post and rail fences. Installation of HV electrical equipment will include a transformer with associated equipment along with:

- Lightning Masts (LM);
- Back-Up Diesel Generator;
- Harmonic filters if required by EirGrid;
- Capacitor Bank if required by EirGrid;
- Fire/Blast Wall;
- Telecoms Pole.

The substation compound has a total area of 5,335m2 . Earthworks will be undertaken so compound is level, with finish compound level of 91.65m. The substation area will be secured by a 2.6m high palisade fence.
This onsite substation will provide a connection point between the proposed solar farm subject of notification to grant planning permission 2560391 connecting into the Great-Island to Kilkenny 110 kV overhead line which passes over the site.

The purpose of the proposed development is to transport the electricity generated at the proposed Drumdowney Solar Farm to the national electricity grid via the existing 110kV overhead lines which cross the development site.

PART II INTERNAL REFERRALS

Roads Section

The comments of Kilkenny County Council's Road Design section are as follows:

3rd February 2026

Our Ref.
Your Ref. ACP-323985-25

Mr. Conor Sweeney
Administrative Officer
Planning

Re: An Coimisiún Pleanála Strategic Infrastructure Development 323985-25

Drumdowney Solar Farm Ltd
Application under section 182A of the Planning and Development Acts (as amended) by Drumdowney Solar Farm Limited for the approval by An Coimisiún Pleanála for a period of 10 years for development at Rathpatrick (townland), County Kilkenny. The proposed development comprises 1) A 110kV Gas Insulated Switchgear (GIS) electricity substation with two-storey GIS substation building, single-storey Independent Power Producer (IPP) control room building, High Voltage (HV) electrical equipment and associated infrastructure (to include transformer, lightning protection masts, back-up diesel generator, fire/blast wall, telecoms pole, perimeter security fencing, security lighting, water and drainage infrastructure, and temporary construction compound) to connect to and serve solar farm development; 2) Associated loop-in / loop out grid connection infrastructure to connect into an existing 110kV overhead transmission line (including underground 110kV cabling, 2 No. new interface towers and decommissioning of ca. 15m of existing 110kV overhead line); 3) Construction and operational access from the public road L34142; 4) All ancillary site development, landscaping and earthworks. The development subject to this application forms part of grid connection and access arrangements which will facilitate the connection of the proposed Drumdowney Solar Farm (Kilkenny County Council Reference 25/60391) to the national grid. A Natura Impact Statement (NIS) has been prepared in respect of the proposed development. The NIS includes consideration of the proposed Drumdowney Solar Farm which is located in the townlands of Atateemore or Blackneys, Ballyhobuck, Ballyrahan, Carriganurra, Charlestown, Davidstown, Drumdowney Lower, Drumdowney Upper, Gorteens, Grogan, Kilmurry, Nicholastown, Rathpatrick, Scartnamoe, Tinvaucoosh and Treanaree in County Kilkenny

A Chara,
We refer to correspondence received 5th January 2026 in relation to the above Strategic Infrastructure Development (SID) and the following is noted:

General
The proposed development comprises the substation and associated loop-in / loop out grid connection into an existing 110kV overhead transmission line (including underground 110kV

cabling, 2 No. new interface towers and decommissioning of ca. 15m of existing 110kV overhead line) at Rathpatrick (townland), County Kilkenny.

The purpose of the proposed development is to transport the electricity generated at the proposed Drumdowney Solar Farm to the national grid via the existing overhead 110kV lines that traverse this site. It is intended that the development will continue to be retained by Eirgrid as an asset after the operational 40-year lifespan of the proposed Drumdowney Solar Farm.

The Drumdowney Solar Farm is currently the subject of a planning application Ref 25/60391, which is undetermined at this stage(notification to grant). This solar farm development is predominately located on 5 no. separate parcels of lands within the overall proposed solar farm development. Inverter/transformer stations located in each parcel will be ultimately connected to the proposed 110kV substation under ACP-323985-25, via 33kV underground AC electrical interconnections (hereafter referred to as 33kV UGC Interconnectors). These are to be placed on private lands and within the public road network, with 5 no. separate Interconnectors. The number of ducts and cables, and therefore the trench width, will vary depending on the section of the 33kV UGC Interconnector. There is a combined length of 13.7km underground ducting proposed in the public road. There are varying circuit arrangements for each of the interconnector routes ranging from single to three-way circuits in the public road and the larger the number of circuits the greater the trench width and impact on the public road network.

Grid Connection

It is noted that under this SID application that the proposed grid connection from the substation to the 110Kv overhead lines is contained within the development site as part of a loop in-loop out arrangement and no element of the grid connection is proposed in the public road. Whilst reference is made to other associated planned development under application Ref 25/60391 (Kilkenny), the grid connection associated with the proposed Drumdowney Solar Farm under 25/60391 does not form part of this SID application. The Road Design Office have no observations in relation to the grid connection from the substation to the 110kV overhead lines. The grid connection associated with the Drumdowney Solar Farm under 25/60391 connecting the solar farm development to the substation will be considered separately under that application.

Substation Site Access

The applicant has provided details of the access arrangements for the construction and operational phases of the development and shall be conditioned to carry out all works to provide the required sightlines as indicated on the drawings as set out in the submitted Drumdowney Substation and Grid Connection Site Access Report (Dec 2025 - CSEA Civil and Structural Engineering Advisors Ltd). The applicant shall be conditioned to ensure that the indicated sightlines are provided for the development access and that all boundary treatments are setback behind the visibility sightlines.

All works associated with entrance details, layouts and the provision of sightlines shall be agreed and confirmed in writing with the Municipal District Office and subject to a Road Opening Licence. Existing roadside drainage shall not be adversely impacted by the proposed entrance and the applicant shall take measures to ensure that surface water from the development site is not discharged onto the public road.

Construction Traffic Assessment and Management

The applicant has provided preliminary details regarding deliveries of materials to the development site and associated traffic generation in conjunction with a preliminary construction programme. The works are envisaged to be completed over a two-year period and include for the Drumdowney Solar Farm construction phase to run concurrently subject to permission.

Prior to commencement of construction works, the applicant shall be conditioned to submit a detailed construction programme for the development including a more detailed traffic impact assessment for the construction phase including details of the anticipated traffic types and volumes for the development which should be provided broken down in daily, weekly, and monthly figures. Details should also include expected peak site traffic, day to day hours and duration.

The applicant has provided details of the proposed construction haul route for the construction of the 110Kv substation. There is approximately 300m of the route located on the local road network extending from the N25 Roundabout to the site entrance.

The applicant shall be conditioned to conduct Pre and Post construction condition survey of the roads affected by the works and construction haul routes in accordance with the "Pavement Survey Standard for Regional and Local Roads" in consultation with Municipal District Office. Proposals to upgrade a road or structure shall be provided where it is shown to be structurally unsuitable and/or where excessive damage to public road(s) is identified based on the Pre and Post surveys.

The applicant shall be conditioned to develop a Construction and Traffic Management Plan for the duration of the project for the construction phase as part of the Construction Environmental Management Plan CEMP. This is a live working document, and the applicant will be required to prepare an updated environmental, construction and traffic management plan for the construction phase which shall be submitted to the Municipal District Office prior to the commencement of development works for agreement. The Construction Traffic Management Plan is also considered a live working document and shall be amended where required as the project progresses and shall reflect any changes to construction and staffing traffic patterns during the work phases or arising from Health and Safety Audits. To facilitate the construction of the development, the junction of the L34142 and the L34141 shall be amended from the current Yield configuration to a Stop layout and the appropriate signage and road markings provided in the interests of traffic safety. The final layout arrangement shall be agreed with the Municipal District Office on completion of the development works.

Road Opening Licences

The applicant shall be conditioned to obtain a road opening licence for all works affecting the public road and verge.

Abnormal Loads

The applicant has indicated that two abnormal loads will be delivered to the substation development site over the course of the construction. Accordingly, the applicant shall be advised that this operation is subject to an abnormal loads permit process.

Attention is drawn to the requirements for Exceptional Abnormal Loads (EAL) introduced in 2024. Where appropriate, Kilkenny County Council intends to adopt in principle the assessment process outlined in the exceptional abnormal load management flow chart to any abnormal loads associated with this development. The applicant shall be requested to consult with Kilkenny County Council in this regard to agree arrangements for the assessment of structures on the delivery route where required. Transport Infrastructure Ireland (TII) considers that it is critical a full assessment by the applicant/developer of all structures on the national road network along the haul route should be undertaken, where relevant, to confirm that all structures can accommodate the proposed loading associated with the delivery of turbine and associated development components to site where the weight of the delivery vehicle and load exceeds that permissible under the Road Traffic Regulations. Specific arrangements for 'Exceptional Abnormal Loads' will also be required, where necessary. The Authority (TII) requests referral of all proposals agreed between the road authorities and the applicant impacting on national roads.

The applicant shall be conditioned to comply with TII requirements as set out in Section 5.4 of the submitted Drumdowney Substation and Grid Connection Site Access Report (Dec 2025 - CSEA Civil and Structural Engineering Advisors Ltd)

Summary

It is recommended that the above observations and requirements are satisfactorily addressed prior to issue of a planning decision.

Mise, le meas,

Owen Shine
Executive Engineer
Road Design

Harry Shine
A/Senior Executive Engineer
Road Design

Seamus Kavanagh
Senior Engineer
Roads

Environment Section

Planning Reg. Ref. No. VA10.323985 Date: 24/02/2026

To: Planning Section
Re: Drumdowney Solar Farm Limited- Substation Grid Connector

A Chara,

I would like to note the following item for the attention of ACP

1. Stormwater management withing the substation area is deemed as acceptable based on an assumption that any vestige of an ability of the area to permeate surface water into the subsoils will suffice especially when the area is covered in surface stone being similar to 6F2 or Cl 804/808. However, the applicant shows distinct twin soakaways and deliberately defers provision of their design details in lieu of the aforementioned logic.
   We believe that no assumptions can be made and that proper design demands proper infiltration testing which should be conducted at or near both the plan location and elevation depths of the proposed soakaways and thereafter any such soakaway should be designed to the BRE Digest 365 Soakaway Design.

2. The applicant needs to elaborate on the methods for the provision of lighting and heating for the temporary site compound and include any mitigation measures necessary to alleviate adverse noise and light emissions resultant to any such provisions.

3. The applicant shows a significant temporary site compound however it is unclarity haw the topography of this area will be incorporated into the design layout of the proposed temporary site compound.

4. The applicant has not elaborated any a lightening design for the proposed area nor have they shown any effects from light spill.

5. The applicant has suggested that the site be served by a dedicated borehole/well. This should be shown on an appropriate site layout of the area.

6. The access road is formed with a stone material being specified as 40mm to dust, however any dust generating material should ideally be avoided and standard hard surfacing methods employed over affect regions of the site.

Mise, le meas,

Ivan Taylor
Executive Technician
Environment Section Tel no. Environment Section: 056-7794470

Date 12/01/2026

COMMENTS ON PLANNING APPLICATION and SID Application (Strategic Infrastructure Development) from An Coimisiun Pleanala as per section 13 of Fire Services Acts 1981 and 2003

Re: Planning Application CC/25/60314

Address: In the townlands of Atateemore or Blackneys, Ballyhobuck, Ballyrahan, Carriganurra, Charlestown,, Davidstown, Drumdowney Lower, Drumdowney Upper, Gorteens, Grogan, Kilmurry, Nicholastown,, Rathpatrick, Scartnamoe, Tinvaucoosh and Treanaree in County Kilkenny

Applicant: Drumdowney Solar Farm Limited

A Chara,

Further to your memo dated 22nd December 2025 (PL-25-60314), see below our views as based on the details submitted with this planning application and any proposed changes either to the design of the buildings or materials to be used in their construction must be submitted to the Planning Authority before any work is carried out.

1.0 Comments

In accordance with the Building Control Regulations 1997 and 2009, this development will require the benefit of a fire safety certificate before works commence on site.

NOTE – It is noted that there is no reference to any units / pods for the storage of energy – BESS – battery energy storage systems within these applications – there are special unique and emerging fire safety risks concerning BESS – battery energy storage systems which may not be subject to the tradition fire safety certificate process under the Building Control Regulations 1997.

2.0 Conditions

We, Kilkenny Fire/Building Control Authority, have no objection in principle from a fire safety point of view to the granting of planning permission in respect of this application subject to the following conditions –

CONDITION 1.0

No new or greater contravention

Kilkenny Fire/Building Control Authority order for the applicant to comply with article 9 of Building Regulations, 1997, SI 497 of 1997, states:

{1} Every works or building to which these regulations apply shall be so designed and constructed –

[a] in accordance with the appropriate requirements set out in the second schedule, and

[b] in such a manner as to avoid the breaching of any other requirements of the schedule.

{2} No works shall be carried out to a building which would cause a new or greater contravention in the building of any provision of these regulations.

Reason for Condition:

(a) To ensure compliance with the building regulations.

CONDITION 2.0

Obligation to obtain a certificate

Kilkenny Fire/Building Control Authority order for the applicant to comply with article 12 of Building Regulations, 1997, SI 496 of 1997, states:

{1} A fire safety certificate shall be required in respect of all works or buildings (modules) to which this Part applies.

{2} Where a fire safety certificate is required in respect of works or a building, a person shall not carry out such works or make a material change of use as regards such a building –

(a) in the absence of a fire safety certificate in respect of the works or building, or

(b) in contravention of any conditions subject to which the certificate is granted.

Reason for Condition:

(a) To ensure compliance with the building regulations.

(b) To ensure an adequate provision of facilities for the fire authority, in the event of fire, for fire fighting within and around the development for the purpose of protection of life and property from fire, whether such outbreak has occurred or not.

CONDITION 3.0
Fire Safety Management

Kilkenny Fire/Building Control Authority orders for such like developments to demonstrate in detail compliance with fire safety management principles in design, construction and operation. Acceptable design codes for fire safety management in this development are as follows -

1. BS 9999: 2017 +Corr 1-Feb 2017, Fire safety in the design, management, and use of buildings - Code of practice.

    a. Section 8.3.2 of BS 9999: 2017 +Corr 1-Feb 2017, fire risk assessment shall be submitted to the fire authority on completion of the works;

2. BS 9997: 2019, Fire risk management systems – Requirements with guidance for use.
3. NFCC – National Fire Chiefs Council - *Grid Scale Battery Energy Storage System planning – Guidance for FRS* - Version 1.0 November 2022 (10-pages)

Therefore, Kilkenny fire authority orders that this development demonstrably complies with the above document with specific reference to 'managing fire safety'.

Section B.0 of Technical Guidance Document B 2024 - *Fire Safety – Volume 1 - Buildings other than Dwelling Houses*, Building Regulations 2024 suggests that it would be appropriate and prudent to consider the importance of this aspect to the overall fire safety of this development. The management of active fire safety measures during the life of the building is an important consideration. The management of passive systems, which include the fire protection provided by the fabric and construction of the building is fundamental, to ensure that deterioration over the life of a building will not impair the level of fire safety.

Kilkenny Fire/Building Control Authority orders that there will be an adequate level of fire safety management within this development at all material times.

Reason for Condition:

(a) To ensure an adequate provision of access/egress and facilities for the public and the fire authority, in the event of fire, for escape & fire fighting within and around the development for the purpose of protection of life and property from fire, whether such outbreak has occurred or not.
(b) To ensure compliance with the building regulations.
(c) To ensure that what is constructed is in accordance to the building codes that are transferable in both design and intent to the capabilities of the emergency services i.e. fire service, to where the development takes place.

CONDITION 4.0

Fire brigade access

The development shall be so designed and constructed that there is adequate provision for access for fire appliances and for such other facilities as may be reasonably required to assist the fire service in the protection of life and property, as per Technical Guidance Document B 2024 - *Fire Safety – Volume 1 - Buildings other than Dwelling Houses*, Building Regulations 2024, Statutory Instrument 497 of 1997.

The access to the properties should comply with the following -

(a) minimum width 3.1m at gates,
(b) 3.7m between kerbs,
(c) minimum clearance height 3.7m,
(d) archway minimum clearance height 4.0m,
(e) minimum carrying capacity 12.5 tonnes, or in accordance with the heaviest operational appliance as part of the Kilkenny Fire Authority fleet e.g. high-reach platform 18.5 tonnes.

CONDITION 5.0

Storage – hazard classification – Appendix D of TGD-B – Purpose Group(s) 6a / 6b or 7a / 7b

Kilkenny Fire Authority orders for such like developments to demonstrate in detail compliance with Appendix D of Technical Guidance Document B 2024 - *Fire Safety – Volume 1 - Buildings other than Dwelling Houses*, Building Regulations 2024

To determine the assessment of risk in industrial and storage buildings.

- Two-storey GIS Sub-station building
- IPP building (independent power producer)
- Equipment containers (5no) (spare parts)

Kilkenny Fire Authority orders that there will be an adequate level of fire safety management within this development at all material times.

Reason for Condition:

(a) To ensure an adequate provision of access/egress and facilities for the public and the fire authority, in the event of fire, for escape & firefighting within and around the development for the purpose of protection of life and property from fire, whether such outbreak has occurred or not.
(b) To ensure compliance with the building regulations.
(c) To ensure that what is constructed is in accordance to the building codes that are transferable in both design and intent to the capabilities of the emergency services i.e. fire service, to where the development takes place.

CONDITION 6.0

Fire Water and Static Storage and interfaced with monitoring system for minimum content

The fire authority requires a specific risk assessment to determine if a fire water static storage tank(s) may be provided on-site -

- to be sizing according to the risk assessment and
- to provide an adequate supply of water for firefighting.

The proposed nature and use of this development i.e. BESS – battery energy storage systems – are new technology and the known requirement for copious volume of water for fire suppression where a thermal run-away incident occurs.

Prior to commencement on-site, full and complete details shall be to the Fire Authority in relation to the static storage tank concerning (but not limited to) its type, size, construction, location, access arrangements, safety arrangements, filling facilities, decanting facilities and any other details required by the Fire Authority at the time.

Under no circumstances whatsoever shall the development be used without full compliance with this condition having been met on a continuing basis.

Reason for Condition:

(a) To ensure an adequate provision of facilities for the fire authority, in the event of fire, for firefighting within and around the development for the purpose of protection of life and property from fire, whether such outbreak has occurred or not.
(b) To ensure compliance with the regulations.
(c) To ensure the protection of the entire building.
(d) Fire-fighters must have immediate access to adequate supplies of water.

CONDITION 7.0

Fire Hydrants + Fire Water Main (**Commercial Development - Industry**)

All fire hydrants, where provided, shall be installed in accordance with the following engineering codes and standards – I.S. 391: 2020 Fire mains for buildings – Installation, commissioning, maintenance and testing; B.S. 9990: 2015 Code of practice for non-automatic fire-fighting systems in buildings; and marked in accordance with BS 3251: 1976; and installed in accordance with BS EN 14339: 2005 and BS 750: 2023, and Technical Guidance Document B; where large capacity flow rate fire hydrants with flow rate capacities of not less than 2,000 litres per minute are required – they shall have an internal clear diameter of 80mm or greater; and / or equivalent approved standard and Technical Guidance Document B.

The water supply infrastructure to any industrial development should have a minimum nominal diameter of 150mm and have a water supply capable of delivering a minimum of 20 to 35 litres per second through any single hydrant.

The flows (l/s) and pressure (dynamic – bar) from the existing/adjacent/extended fire water main hydrants should be confirmed in writing to the fire authority, thus to demonstrate an adequate fire water main supply for the fire authority in the event of an emergency. Fire-fighters must have immediate access to adequate supplies of water.

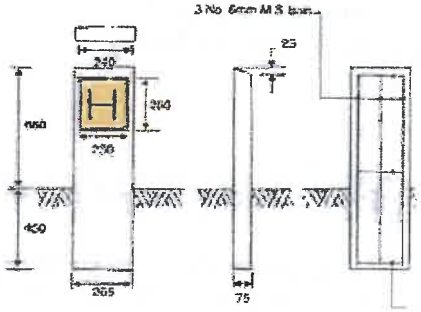

Figure 1.0, Hydrant markers



Figure 2.0, Hydrant markers

On completion of the development a set of "as constructed" drawings, electronic copy and paper in duplicate, should be submitted to the Fire Authority indicating the location of each hydrant and their associated flow(s).

Reason for Condition:

(a) To ensure an adequate provision of facilities for the fire authority, in the event of fire, for fire fighting within and around the development for the purpose of protection of life and property from fire, whether such outbreak has occurred or not.

(b) To ensure compliance with the regulations.

CONDITION 8.0
Fire Detection and Alarm System - Monitored

A fully monitored fire detection and alarm system(s) shall be designed, installed, tested, commissioned and maintained fully in compliance with I.S. 3218: 2024 Fire Detection and Alarm systems for buildings – system planning, design, installation, commissioning, servicing and maintenance.

Reason for Condition:

(a) To ensure an adequate provision of facilities for the fire authority, in the event of fire, for fire fighting within and around the development for the purpose of protection of life and property from fire, whether such outbreak has occurred or not.

(b) To ensure compliance with the regulations.

(c) To ensure the protection of the entire building.

CONDITION 9.0
Compartmentation – Space Separation – Fire Spread (FIRE WALL)

The compartmentation / space separation – fire spread risk of these premises shall be designed to be in accordance with the principles of Technical Guidance Document B 2024 - *Fire Safety – Volume 1 - Buildings other than Dwelling Houses*, Building Regulations 2024 and/or other engineering codes as agreed with the Chief Fire Officer of Kilkenny Fire Authority.

The design, size, and distribution of the 'fire compartments' shall be submitted to the Chief Fire Officer of Kilkenny Fire Authority for agreement and consultation under the fire safety certificate application process.

The fire authority will seek for confirmation of the minimum separation distances between the [1] transformer kiosk(s) and [2] equipment container(s) and other risks to ensure the risk fire spread from one part to another part has been adequately considered – further consultation will be required.

Reason for Condition:

(a) To ensure an adequate provision of facilities for the fire authority, in the event of fire, for fire fighting within and around the development for the purpose of protection of life and property from fire, whether such outbreak has occurred or not.
(b) To ensure compliance with the regulations.
(c) To ensure the protection of the entire building / groupings of units / to minimize fire spread.
(d) To ensure that fire spread from any fire event will be contained to be minimised to be as small as reasonably practicable from the initial design stage.

CONDITION 10.0

Provision for suppression systems

Kilkenny Fire Authority is of the view that due to the following reasons–

1. The proposed nature and use of this development *i.e. BESS – battery energy storage systems, where applicable,*
2. The size and scale and rural location of the development,
3. The limited nature of the fire appliance fleet available to Kilkenny Fire Authority, that provision for suppression systems within this development may be required.

The design and scope of the installation shall be agreed with Kilkenny Fire Authority prior to commencement of works.

Kilkenny Fire Authority order that a full fire risk assessment be carried out to demonstrate the scope and nature and risk of the and the capabilities of the fire appliance fleet available to Kilkenny Fire Authority to extinguish a fully developed fire within the largest fire compartment within this development.

Reason for Condition:

(a) To ensure an adequate provision of facilities for the fire authority, in the event of fire, for fire fighting within and around the development for the purpose of protection of life and property from fire, whether such outbreak has occurred or not.
(b) To ensure compliance with the regulations.

CONDITION 11.0

Suppression systems for premises (pr risk areas within premises)

The design proposal within this development, yet to confirmed, will direct the most appropriate and measured fire suppression approach for this premises –

The design proposal within this development, yet to confirmed, will direct the most appropriate and measured fire suppression approach for this premises –

The fire suppression approached that may be considered are as follows –

1. Oxygen suppression/depletion system;
2. Sprinkler suppression (ceiling mounted);
3. Sprinkler suppression (in-rack mounted);
4. Sprinkler suppression (gaseous);
5. Sprinkler suppression (water);
6. Sprinkler suppression (foam);
7. Other systems;

Details of the internal configuration of these premises will be required to be submitted to the Chief Fire Officer of Kilkenny Fire Authority for agreement and consultation under the fire safety certificate application process.

Kilkenny Fire Authority order that a full fire risk assessment be carried out to demonstrate the scope and nature and risk of the development (and the bulk products being stored) and the capabilities of the fire appliance fleet available to Kilkenny Fire Authority to extinguish a fully developed fire within the largest fire compartment within this development.

Reason for Condition:

(a) To ensure an adequate provision of facilities for the fire authority, in the event of fire, for fire fighting within and around the development for the purpose of protection of life and property from fire, whether such outbreak has occurred or not.
(b) To ensure compliance with the regulations.
(c) To ensure that in the event of a fire incident, that the appropriate fire suppression can be correctly and quickly placed near the set of the fires, due to the scale of the proposed premises and the limited effective range of the firefighting braches in use today with health and safety considerations for our firefighting personnel.

CONDITION 12.0

Environmental Containment Spill Kits

An adequate number of Environmental Containment Spill kits shall be provided onsite so that the maximum travel distance to a spill kit shall not be more 80 metres.

Reason for Condition:

(a) To ensure an adequate provision of facilities for the fire authority, in the event of spill, for containment purposes within and around the development for the purpose of protection of life and property from fire, whether such spill has occurred or not.
(b) To ensure compliance with the regulations.

Note
Consultation with the Chief Fire Officer of Kilkenny Fire and Rescue Service for the correct size, compatible make and model of appropriate Environmental Containment Spill kits to be supplied and maintained on-site on a continuing basis.

CONDITION 13.0

Portable first-aid fire fighting equipment

Adequate portable first-aid fire fighting equipment shall be provided on-site and throughout ALL areas of this development. Reference should be made to the following engineering standards –

i. IS 291
ii. BS EN 3
iii. BS 5306: Part 1
iv. BS 5306: Part 3
v. BS EN 761: Part 1

Portable first-aid fire fighting equipment may include combinations of the following –

1) Portable Foam Cannons (*trailer-mounted monitors with self-inducing foam cannons*), capable of producing 1,800 litres per minute of foam solution @ 7 bar
2) Dry Powder Extinguishers, on mobile trolleys of sizes ranging from 100kg to 150kg
3) Combined first-aid fire fighting extinguishing points, combination of sand buckets with lids and suitably sized extinguishers.
4) Standard industrial sized first-aid fire fighting extinguishers

Note
Consultation with the Chief Fire Officer of Kilkenny Fire and Rescue Service for the correct size, compatible make and model of appropriate **fixed/portable** first-aid fire-fighting equipment to be engaged on site and maintained on-site on a continuing basis.

Reason for Condition:

(a) To ensure an adequate provision of facilities for the fire authority, in the event of fire, for fire fighting within and around the development for the purpose of protection of life and property from fire, whether such outbreak has occurred or not.
(b) To ensure compliance with the regulations.

Mise, le meas,
For and on behalf of
Kilkenny County Council Fire and Rescue Service

Killian John Hennessy
Senior Assistant Chief Fire Officer
Kilkenny County Council Fire and Rescue Service

FIRE and RESCUE SERVICE
KILKENNY
PREVENTING PROTECTING RESPONDING

PART III National/Regional/Local Policy context

National

The Irish Government are a signatory to the Paris Agreement and has committed to a decarbonisation pathway to 2030 consistent with reaching the EU Target of Zero emissions by 2050. The EU key targets are;

- At least 40% cuts in greenhouse gas emissions (from 1990 levels)
- At least 32% share for renewable energy
- At least 32.5% improvement in energy efficiency

Ireland's targets include at least 40% reduction in domestic Green House Gas emissions by 2030 compared to 1990 and an increase to 27 percent in renewable energy consumption.[1]

The Government's Climate Action Plan sets out an ambitious course of action over the coming years to address climate disruption. The Plan clearly recognises that Ireland must significantly step up its commitments to reduce emissions and sets out targets per sector. To meet the required level of emissions reduction, by 2030 the Plan aims to increase electricity generated from renewable sources to 70%, indicatively comprised of:

- at least 3.5 GW of offshore renewable energy
- up to 0.4 GW of grid-scale solar energy (NDP: 1.5 GW)
- up to 8.2 GW total of increased onshore wind capacity

The National Planning Framework (NPF) through NPO 55 promotes "renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050." The Country's transition to a low carbon energy future as outlined in National Strategic Outcome 8 of the NPF requires shift from predominantly fossil fuels to predominantly renewable energy sources.

The National Energy Security Framework 2022 was prepared and adopted specifically in response to the situation in Ukraine and the implications for security of the EU and Irelands national energy security. The Framework notes that the level of dispatchable electricity generation capacity (i.e. capacity that does not rely on wind or solar energy) needs to increase significantly over the coming years due to reduced reliability of existing plants, anticipated new power stations not being developed as planned, expected strong growth in demand for electricity, and the closure of existing generation.

Regional

Regional Spatial and Economic Strategy Regional for the southern region (RSES)

The Regional Spatial and Economic Strategy for the Southern Region supports the transition to a low carbon, circular and climate resilient region. It recognises the need to shift from

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[1] Department of Communications, Climate Action and Environment website

reliance on fossil fuels to a more diverse range of low and zero-carbon sources including renewable energy from onshore wind, bioenergy, solar and offshore energy in order to decarbonise the energy sector.

Climate Action Plan 2021

The recently adopted plan commits Ireland to a legally binding target of net-zero greenhouse gas emissions by 2050, with a 51% reduction by 2030. The plan sets out indicative ranges of emissions reductions for each sector of the economy by 2030. Among the most critical measures in the plan is to increase the proportion of renewable electricity to up to 80% by 2030, including a mix of offshore/onshore wind and solar PV. The needs for solar as contributing to the National Renewable Energy Targets has therefore been justified.

The Kilkenny City and County Development Plan 2021 - 2027

Chapter 2 of the County Development Plan relates to Climate Change
Chapter 11 of the County Development Plan relates to Renewable Energy
Section 11.6 specifically relates to Solar Energy
Section 11.6.3 Photovoltaic Solar Electricity
11.6.5 Solar Energy Development Management Guidance
11.6.5.1 Utility Scale Solar PV (USSPV)

Landscapes

The sensitivity of the Landscape Character Areas is defined as its overall resilience to sustain its character in the face of change and its ability to recover from loss or damage to its components

Sensitive land-use categories include areas which are open and exposed with sparse or low growing vegetation cover which is insufficient to provide screening. Even if planting is introduced, the exposed nature of these areas will not support any significant tall vegetation. Due to this, any development would be visible over a wide area. The exceptions to this are broadleaved, mixed forest and transitional woodland scrub areas which do support tall vegetation with potential to screen development. However, these categories area sensitive due to their natural character and their longevity in the landscape; any loss to their structure (for example, through felling) would have a visual impact over a wide area.

In relation to overall renewable energy generation targets for Co. Kilkenny, based on the Kilkenny City and County Draft Development Plan 2021-2027, Council has established a target to generate 253MW of renewable energy by 2030. This is however is not considered a ceiling given the evolving climate emergency.

Relevant Planning History

P2560391: Kilkenny County Council issued notification to grant planning permission on the 13/02/2026 to Drumdowney Solar Farm Ltd for a solar farm with a total area of circa 189 hectares in the townlands of Atateemore or Blackneys, Ballyhobuck, Ballyrahan, Carriganurra, Charlestown, Davidstown, Drumdowney Lower, Drumdowney Upper, Gorteens, Grogan, Kilmurry, Nicholastown, Rathpatrick, Scartnamoe, Tinvaucoosh and Treanaree in County Kilkenny. The solar farm will consist of solar panels on ground mounted frames, 27 no. single storey electrical inverter/transformer stations, 5 no. single storey spare parts containers, 3 no.

Ring Main Units, 5 no. weather stations, underground electrical ducting and cabling within the development site, private lands and within the L3429, L7523, L7563, L7469, L3407, L3414, L34144, L7466, L3406, L7483, L3415, N25 and N29 public roads to connect solar farm field parcels, security fencing, CCTV, access tracks, 7 no. watercourse/drain deck crossings and 4 no. horizontal directional drill crossings (under the N25 and N29 public roads and the Luffany River), temporary construction compounds, landscaping and all associated ancillary development and drainage works. Construction and operational access will be via 7 no. existing entrances from the L3429, L7469, L7466, L4783 and L34142 which will be subject to entrance upgrade works. Separate construction phase access options are proposed for Parcel 4 via Port of Waterford and the L4783. The operational lifespan of the solar farm will be 40 years and planning permission is requested for this duration. A Natura Impact Statement (NIS) has been prepared and will be submitted to the Planning Authority with the application.

18573: Kilkenny County Council granted Eirgrid planning permission for the upgrade of the Great Island Kilkenny 110kV Overhead Line.

PART IV SUPPORTING REPORTS

Overall

Documentation including Planning and Environmental Statement, Environment Impact Assessment Screening, Ecological Impact Assessment, Natura Impact Statement (NIS), Flood Risk Assessment, Archaeological, Architectural and Cultural Heritage Impact Assessment Report, Noise Impact Assessment, Site Access Report Construction Methodology Report, have been prepared in relation to the project and accompany this planning application.

AA Screening found that it could not be excluded, on the basis of objective scientific information that proposed works, individually or in combination with other plans or projects, would have a significant effect on a Natura 2000 site. Therefore, it was required to ascertain whether proposed works would have an (in-combination) adverse effect on integrity of Natura 2000 sites.

Natura Impact Statement

The proposed development subject to this Strategic Infrastructure Development (SID) application to An Coimisiún Pleanála is not located within or closely adjacent to any designated sites. There is a total of 4 European sites located within 15km of the proposed substation development site. The closest of these sites are the River Barrow & River Nore SAC (2.4km) and Lower River Suir SAC (2.7km). The proposed development is located in the Suir Catchment with the Blackwater (Kilmacow)_SC_010 subcatchment. The site is not located close to any EPA mapped watercourse. The headwaters of the Rathpatrick Stream are located >300m west of the site and the Rathdowney Lower Stream is located >350m east of the application site. Both of these watercourses are tributaries of the Lower Suir.

The proposed development is intrinsically linked with the proposed Drumdowney Solar Farm development. Although the proposed substation and grid connection development is itself located distantly from the European sites for which there is no clear hydrological pathway by which water-quality mediated effects are likely to result in significant effects on the Lower River Suir SAC or the River Barrow & River Nore SAC, the overall project includes the

proposed solar farm development which has been assessed as requiring a Natura Impact Statement:

In this case, the overall project, including substation, and, grid connection and the Drumdowney solar farm are assessed to have elements that could in the absence of adequate environmental controls and mitigation measures result in significant effects on European designated sites in the wider receiving environment.

A Natura Impact Statement has been prepared by Ecology Ireland to actively consider the potential for adverse impacts on qualifying interests of the Natura 2000 sites in proximity, arising from construction phase. No operational impacts have been identified. The findings of the report have determined that subject to identified mitigation measures no significant adverse impacts arising from the construction of the proposed development will occur in relation to Natura 2000 sites.

An Coimisiúin should satisfy itself that adequate detail has been given, in terms of various method statements, design details in order to determine if the development is likely to have direct, indirect or 'in combination' impacts on the habitats and/or species for which the nearest Natura 2000 sites are designated.

PART V ASSESSMENT

Introduction

This below section provides an assessment of the proposed substation and associated works in terms of policy, public health, biodiversity, visual and residential amenity impacts, traffic and transport and other relevant area.

Planning Policy and Development Context

The Commission for Regulation of Utilities (CRU) launched a new grid connection policy in March 2018 for renewable and other generators, known as the Enduring Connection Policy (ECP-1), which sought to allow "shovel ready" projects, that already have a valid planning permission, connect to the electricity networks.

The revised NPF also emphasized the need for grid development and expansion, recognizing that meeting regional capacity targets will require coordinated upgrades to the electricity grid at both national and local levels. National Policy Objectives (NPOs) 71 and 72 specifically support the development and interconnection of onshore grid infrastructure, while NPO 55 promotes sustainable international grid connectivity enhancements.

In summary, there is strong policy support to accellerate the grid connection for advanced projects such as renewable energy projects (particularly via the ECP2 which prioritised large reneable enrgy projects).

Public Health

A suite of technical reports in relation to landscape, visual, and noise were prepared. The layout of the proposed substation / grid connection was considered in proximity to existing residential properties. The proposed substation is inland development, set back from public roads and residential properties. The nearest third party dwellings to the substation compound area are approximately 185 metres to the northwest.

Construction
Additional noise and dust from temporary construction works may be experienced by residents and other property users in the vicinity. This can be effectively managed, having regard to nature of the project and measures proposed in Drumdowney Substation and Grid Connection Construction Methodology and Construction and Environmental Management Plan for the solar farm. On completion of works, noise and dust levels will return to background levels. The design includes focused water control measures to ensure that runoff of sediment or other pollutants will not enter watercourses therefore the proposed project will not have any impact on water quality. In addition, it should be noted that there is no risk to drinking water supplies associated with the local public water supply scheme which is regulated by the Environmental Protection Agency. No significant impact is likely.

Operation
High voltage equipment is to be contained within substation compound and design and operation of same is understood in accordance with ESB Network as well as other international standards. Security fencing to be erected to prohibit unauthorised access and warning notices will be erected to ensure no safety issues should arise. The location of substation and noise generating plant in a setback position from the public road and local residences means any audible noise during operational phase will be well within allowable limits.

The assessment on population and human health primarily considers property receptors and residential amenity, as well as current land use and activities, occurring within vicinity of proposed wind farm site, as this is where any likely effects on population and human health receptors may mainly to occur.

Decomissioning
In relation to decommissioning, the solar farm may be decomissed however electricity substation and grid connection likely to be used for electricity network should parcels of solar panels be decomissioned of 40 year life.

Mitigation
Public health impacts as set out with respect to construction, operation, decommissioning with particular regard to noise during operation can be made within acceptable levels. Supporting reports such as CEMP, Noise Impact Assessment demonstrate same.

Biodiversity

Operation
Based on the ecological surveys, the results of which are presented in the EcIA, wider project site is currently considered to be of 'local importance' (improved grassland) as it contains some semi-natural habitat such as trees, with site of substation (c.1.75ha) comprising lower value arable crop habitat. The collective solar farm projects include focused measures to foster and regenerate biodiversity development across the subject site. This includes development of biodiversity corridors and creation of riparian enhancement zones. Significant hedgerow bolstering and new planting is proposed A total of c. 372 linear metres of hedgerow and c.191 sqm of scrub to be permanently removed throughout solar farm sites to facilitate site entrance, access tracks and underground cabling. This will be offset by 2,380 new linear metres of

hedgerow and 22,553 linear metres of bolstered hedgerow, as required. The site is not located within any statutory designated area. A Natura Impact Statement prepared by Ecology Ireland has been prepared in respect of designated Natura 2000 sites. This report has actively considered potential for adverse impacts on qualifying interests, arising from construction phase and proposed mitigation measures. No significant impacts likely.

The proposed development includes focused measures to foster biodiversity development across subject site including creation of species diverse wild flower berms appropriately managed to attract pollinators, invertebrates and bird species; bolstering of existing and planting of new hedgerows as biodiversity corridors providing food sources, nesting sites and allowing connectivity throughout the site for different species; and seeding of margins across site with wildflower mix in accordance with Bride (EU Life Project), increasing biodiversity across perimeter project as opposed to improved and managed grassland margins. Only native tree and shrub species suited to the locality to be used in the final landscaping plan.

Construction
Energy, including electricity and fuels, will be required during construction phase. Some soil will be stripped for access tracks. Stated that this will be carried out outside of periods of wet weather with appropriate run-off control to be installed and maintained for the duration of construction phase. Construction will use various raw materials typically inert in nature. There will be no material impact on water resources arising from construction phase, and works themselves include bolstering of hedgerows, new planting and other measures in support of positive biodiversity enhancement. No out of ordinary use of natural resources likely during the construction process. No significant impacts likely.

No removal of habitats or movement of construction machinery will occur outside of the development works area/footprint during the construction phase, where the works area/footprint will be clearly marked for associated site staff.
The following best practice measures form part of the construction methodology and will help to contain and/or prevent the introduction of invasive species on the site as follows:

- When deemed necessary, all plant and equipment employed on the proposed works (e.g., diggers, tracked machines, footwear etc.) will be thoroughly cleaned down using a power washer unit, and washed into a dedicated and contained area prior to arrival on site and on leaving site to prevent the spread of invasive aquatic / riparian species. A sign off sheet will be maintained by the contractor to confirm cleaning;
- Material gathered in the dedicated and contained clean down area will need to be appropriately treated as contaminated material on site;
- For any material entering the site, the supplier must provide an assurance that it is free of invasive species;
- Ensure all site users are aware of invasive species management plan and treatment methodologies. This can be achieved through "toolbox talks" before works begin on the site;
- Adequate site hygiene signage should be erected in relation to the management of non-native invasive material;
- All excavations/trenches should be covered at night, or a suitable means of escape provided for nocturnal mammals.

Field surveys of proposed development were carried out to inform submitted Ecological Impact Assessment (EcIA) (Ecological Impact Assessment by Ecology Ireland Wildlife Consultants

Ltd.). Location of proposed substation / grid connection dominated by agricultural grassland habitat (GA1). Site is made up of several cattle grazed and silage fields bounded by hedgerow (WL1). No Annex I habitats or rare, protected or invasive plant species present within application site. Habitats present are considered of local importance (lower value). Any potential effects on ecology as a result of proposed development will be confined to construction phase, relatively short in duration (approximately 2 years), and, will be insignificant due to minor nature of earthworks involved combined with implementation of standard environmental controls. No significant effects on designated sites, habitats, flora or fauna have been identified as a result of proposed development. Natura Impact Statement (NIS) which accompanies EcIA, objectively concludes that, with implementation of mitigation measures, no significant effects arising from wider proposed solar farm project will impact upon any Natura 2000 sites. Taking above into consideration, deemed that proposed development will result in neutral effect on ecology overall. The proposed substation / grid connection is a component part of Drumdowney Solar Farms. Application includes focused Biodiversity Management Plan, tailored to reflect local ecological survey work completed, contributing positively to protection and enhancement of local ecosystems around wider solar farm site. These include specific management techniques like planting native wildflowers, creating pollinator habitats, and installing bat and bird boxes to support biodiversity, while also addressing potential impacts on existing habitats and species. Proposals are underpinned by landscape and maintenance management schedules for ongoing monitoring towards achievement of biodiversity goals commensurate with provision of clean form of renewable energy. EcIA confirms areas of localized hedgerow removal will be offset by considerable landscaping planting in support of principle of biodiversity gain across local area.

The Natura Impact Statement (NIS) in support of the Appropriate Assessment process, which accompanies this EcIA, objectively concludes that, with the implementation of mitigation measures, no significant effects arising from the wider proposed solar farm project will impact upon any Natura 2000 sites

Land and Soils

Assessment

Assessment of land, soils and geology undertaken in accordance with EPA (2022) 'Guidelines on the Information to be contained in Environmental Impact Assessment Reports'.
Available desktop information and geotechnical site investigations undertaken for proposed project used to establish baseline conditions for Land, Soils and Geology

Site Conditions

The National Teagasc Subsoils dataset classifies subsoils based on Geological Survey of Ireland Quaternary Sediment Types. Site area largely comprises of fine to coarse loamy drift with sillceous stones. No karst landforms or rock outcrops indicated on site. Potential impacts on land, soil and geology in the absence of appropriate construction phase measures include following:

- Soils have potential to become polluted by spillages during construction;
- Soils have potential to be compacted by plant and machinery during construction.

Construction

The following construction measures will take place in relation to soils:

Excavated material to be temporarily stockpiled onsite for re-use during reinstatement. Stockpiles will be restricted to less than 2m in height;

- No stockpiles associated with excavation works associated with proposed grid connection to be located within 10m of drains;
- Imported materials and any site materials will be tested prior to use to determine its geotechnical and geo-environmental properties to assess suitability for use;
- Any earthen (sod) banks to be excavated to be carefully opened with surface sods being stored separately and maintained for use during reinstatement.

Hydrology

Site Specific Flood Risk Assessment by IE Consulting

In summary, there are no history of flood events onsite, the nearest fluvial flood events are to Luffany Stream 800m due east, pluvial flood event c.900m due north.

The site is not at risk of fluvial, tidal/coastal, pluvial or groundwater flooding. The development as proposed is located within Flood Zone 'C' and is therefore not subject to requirements of the Justification Test. – Overall, the flood risk to the specific area is considered to be low. The development as proposed is not expected to result in an adverse impact to the existing hydrological regime of the area or increase flood risk elsewhere and is therefore considered appropriate from flood risk perspective

Site Conditions

The site is not at risk of fluvial, tidal/coastal, pluvial or groundwater flooding. Development as proposed is located within Flood Zone 'C' with flood risk to the specific area of proposed development site considered to be low. Development as proposed is not expected to result in an adverse impact to the existing hydrological regime of area or increase flood risk elsewhere and is therefore considered to be appropriate from a flood risk perspective.

Surface Water Design

Surface water will continue to be accommodated by existing original drainage and infiltration pattern on site via network of perimeter drains. There is adequate capacity in existing drainage regime. Any overgrown drains will be cleaned and cleared of excess vegetation and subject to regular inspection and maintenance to aid performance.

The design includes focused water control measures to ensure run-off of sediment or other pollutants will not enter watercourses therefore proposed project will not have impacts on water quality. In addition, it should be noted that there is no risk to drinking water supplies associated with local public water supply scheme regulated by Environmental Protection Agency.

Appropriate buffers have been incorporated into the design to ensure the protection of water courses.

Surface water drainage proposals for proposed substation compound designed to mimic the natural drainage patterns of the site and thereby be in accordance with the Best Management Practices (BMPs) of Sustainable Drainage Systems (SuDS). This is achieved when the following parameters are considered:

- The compound construction is formed with permeable stone thus mimicking a soakaway scenario. ESB compound stone is single sized for the first 150mm for safety purposes. Then changes to a graded 6F2 material;
- The main areas to be drained include the roofs and compound road. These equate to approximately 2,359m². The compound road will be drained via series of road gullies;
- Assuming even the most basic of infiltration rates down through the permeable compound stone, the existing greenfield situation is easily maintained. The surface water generated in hardstanding areas and in bunded areas within substation compound will discharge to soakaway via Class 1 Full Retention Oil Separators. The electrical transformer in the substation is oil filled equipment and, as such, is protected with impermeable bunds. Surface water generated in this bund will be pumped out by an oil sensitive pump ensuring only non-contaminated water enters the site drainage network.

Wastewater Design
For wastewater, a foul holding tank to be emptied periodically is proposed. Stated that a foul holding tanks are normally used in EirGrid and ESB substations.
Proposed to use self-flushing toilets in station, which would flush automatically twice a week. The station will include 2 no. 6 litre flush WCs so a minimum weekly foul flow of 24 litres can be expected. The self-flushing WCs will therefore contribute 1,248 litres per annum. Combining the automatic flush and maximum user demand figures would result in a maximum annual generation of 7,571 litres (7.5m³) of foul sewer water waste. The 5m³ tank proposed will be emptied approximately every three months. As outlined, the capacity provided is well in excess of what is required.

It is proposed to provide the required potable water demand of the station with a bored well on site. The potable water demand within the site will be low as proposed station is to be unmanned. To avoid issues like stagnation in the water supply line and problems resulting, there will be a continual water demand of 24 litres per week from automatically flushing WCs within station.

Construction
A buffer of 5-10 m from the closest drain or watercourse is to be established and marked out prior to the commencement of construction activities. The buffer will be maintained with exception of localised areas where fencing, access, crossing or cable trenching is required;
- Silt fencing will be installed within works area for proposed interconnector cables. The silt fence will provide protection from sediment and potential site water runoff;
- The silt fencing will be checked twice daily during construction and once a day thereafter to ensure that it is working satisfactorily until such time as reinstated ground/material has been fully established;
- If dewatering is required as part of proposed works e.g., in trenches for underground cabling or in wet areas, water must be treated prior to discharge. The Contractor shall employ best practice settling systems to ensure maximum removal of suspended solids prior to discharge of any surface water or groundwater from excavations to receiving waterbodies. This may include treatment via settlement tanks. There will be no direct pumping of water from works to any watercourses or drains at any time;

- An emergency-operating plan will be established to deal with incidents or accidents during construction that may give rise to pollution within nearby watercourses or drains. This will include means of containment in event of accidental spillage of hydrocarbons or other pollutants (spill kits etc.);
- The contractor will ensure good housekeeping always maintained and all site personnel made aware of importance of nearby estuary/aquatic environments and requirement to avoid pollution of all types

Environment Referral Response

As per 'Referrals, the Environment Section have raised a number of matters in relation to the following:

- Stormwater management within substation area deemed as acceptable based on an assumption that any vestige of an ability of the area to permeate surface water into the subsoils will suffice especially when the area is covered in surface stone being similar to 6F2 or Cl 804/808. However, the applicant shows distinct twin soakaways and deliberately defers provision of their design details in lieu of the aforementioned logic.

  No assumptions can be made and proper design demands proper infiltration testing shall conducted at or near both plan location and elevation depths of tproposed soakaways and thereafter any such soakaway shall be designed to the BRE Digest 365 Soakaway Design. This can be addressed as a of pre-commencement condition;
- The applicant has suggested that the site be served by a dedicated borehole/well. This should be shown on an appropriate site layout of the area.

It is considered that both of the above issues can be resolved by way of pre-commencement conditions.

Resources/Material Assets

The most significant possible negative impacts on environment, without appropriate mitigation measures in place, are likely to be:

- Construction traffic contributing to congestion and road safety hazards on local road network;
- Adverse health and amenity impacts arising from noise and air quality pollution during construction phase;
- Ecological disturbance, habitat loss of fauna, and potential impact on designated sites;
- Possible residential amenity and visual impacts. These matters have been considered as part of design and assessment of subject proposal. Following assessments have been prepared, which include detailed proposals for mitigation and monitoring;
- Landscape Design Strategy and Landscaping Proposals;
- Noise Impact Assessment Report;
- AA Screening / Natura Impact Statement, Ecological Impact Assessment Report;
- Site Access Report;
- Construction Methodology Statement for Substation and Grid Connection;
- Landscape and Visual Impact Assessment.

No material impact on water resources arising from construction phase, and works themselves include bolstering of hedgerows, new planting and other measures in support of positive biodiversity enhancement.

Operational Phase
No significant impacts anticipated on resources during construction phase.

Decommissioning Phase
No significant effects are anticipated on resources as anticipated during decommissioning phase and no specific mitigation measures proposed.

Grid connection ducting and pipework this may remain in place for use by electricity service providers thereafter.

Mitigation Measures
Standard measures / practices to avoid or otherwise minimise impacts to resources/existing utility assets and/or services provision will be undertaken:

Noise
Noise Impact Assessment by Wave Dynamics Acoustic Consultants attached.

Operation
The noise generating plant associated with substation and solar farm projects are inverters and 110kV substation transformer, which is focus of SID application being made to An Coimisiún Pleanála. As illustrated on site layout plans, this plant is located centrally, away from local receptors. This is reflected in findings of noise assessment with modelled noise levels at facades of neighbouring dwellings well below the recommended EPA/WHO/BS8233 guidelines of 55dB during day time and 45dB at night time.

It has been demonstrated that noise from project inclusive of substation will be well within allowable limits. Functioning surface water network and sanitary system will be subject to routine monitoring and maintenance.

Construction
The noise generated from construction activities and related powered mechanical equipment has the potential to pose adverse noise impacts to existing surrounding sensitive receivers. The construction phase of development due to its nature is temporary and therefore any potential noise impacts will be short term. Potential noise impact will be controlled by means of day-time working hours and in accordance with all relevant British Standards Codes of practices such as: BS 5228-1: 1997 "Noise Control on Construction and Open Sites -Part 1"; BS 5228:2009 and A1:2014 "Code of practice for noise and vibration control on construction and open sites".

Construction
All plant will be required to conform to the British Standards (BS) 5228 Code of practice for noise and vibration control on construction and open site. BS5228 provides a comprehensive guidance on construction noise including details of typical noise levels associated with various items of plant or activities, prediction methods and measures and procedures and is an accepted standard for construction practice in Ireland given absence of statutory Irish guidelines.

Lighting

Environment

As per 'Referrals, the Environment Section have noted that the applicant needs to elaborate on methods for provision of lighting and heating for temporary site compound and include any mitigation measures necessary to alleviate adverse noise and light emissions resultant to any such provisions.

They have also stated that the applicant has not elaborated any a lighting design for the operation of proposed area nor have they shown any effects from light spill.

It is noted that the nearest residential receptors is c.185m away and resultantly both of the above matters can be addressed by way of pre-commencement condition.

Air Quality

Construction

Additional noise and dust from temporary construction works may be experienced by residents and other property users in the vicinity.

The main activities that may give rise to dust emissions during construction include the following:

- Excavation and removal of earthworks.
- Materials handling and storage.
- Movement of vehicles (particularly HGV's) and mobile plant.
- Suspended solids in surface water runoff.

Construction and Operation

As per 'Referrals', the Environment Section have noted that the access road is formed with a stone material specified as 40mm to dust. They have stated that any dust generating material should ideally be avoided and standard hard surfacing methods employed over affect regions of the site. It is considered that this can be resolved by way of pre-commencement condition.

Post Construction Overall/Operation

Beneficial impacts to air quality from generation of renewable electricity from proposed project. NOX emission savings which may otherwise have been generated from fossil fuels. Impact to air quality will be beneficial, long-term, slight and not significant.

Management

This can be effectively managed, having regard to the nature of the project and measures proposed in the Drumdowney Substation and Grid Connection Construction Methodology and Construction and Environmental Management Plan for the solar farm. On completion of works, noise and dust levels will return to background levels.

Landscape and Visual

A Landscape Character Assessment has been incorporated into the Kilkenny County Development Plan 2021 – 2027 which separates the county into specific Landscape Character Types (LCTs). The proposed development is entirely contained within the LCA E - 'South Eastern Hills/Uplands'.

The wider solar farm development is situated across two LCAs with parcels one, two and four (i.e. the three easternmost parcels) contained within LCA E - 'South Eastern Hills/Uplands',

which is described as being "characterised by open undulating lands with regular (medium sized) field patterns, where some rock outcrops occur".

Parcel three is contained within the easternmost extent of LCA G - 'South Kilkenny Lowlands', described as having "open lands with regular (medium sized) field patterns.

Operational Visual Effects
The prepared Landscape and Visual Impact Assessment (LVIA) confirms that the proposed development of the substation and associated works is not considered to give rise to any significant residual visual impacts.

Construction Visual Effects
Constrction visual impacts limited to on-site substation compound. Excavations will tie into existing ground levels and will be the minimum required.
The Environment Section have raised that the applicant shows a significant temporary site compound howeverhave stated that it is unclear how the topography of this area will be incorporated into the design layout of the proposed temporary site compound. This can be addressed by way of pre-commencement condition.

Decommission Visual Effects
Visual effects at decommission stage not considered to be significant.

Cultural Heritage
Detailed Archaeological, Architectural and Cultural Heritage Impact Assessment of the grid connection prepared by Rubicon Archaeology and enclosed with application.
There are 19 no. sites of archaeological and/or cultural heritage significance within the study area for the project. This includes a Ringfort – rath to the north of the site (CH008), with no development within the zone of notification. Demonstrated that proposed development will not have any direct effect on any known sites. The setting of CH008 has been considered as part of project design, including landscape mitigation.
Archaeological recommendations include programme of advanced archaeological works prior to construction (combination of further geophysical survey and testing trenching to be completed under licence), archaeological monitoring and strict reporting requirements.
A strategy of mitigation by avoidance has been adopted, with no recorded monuments within defined red-line boundary for the proposed development.



Fig: Recorded Monuments relative to application

Traffic and Transport/Access

The site will be accessed for both construction and operational phases of a single entrance from the L34142. This existing entrance will be subject to upgrades, including removal of existing roadside sod and stone ditch to provide new gate as presented under notification to grant planning permission 25/60391. The entrance will be suitably splayed and has been subject to sight line and autotrack analysis, with latter including modelling of abnormal load delivery for transformer. Operational sightlines will be maintained by trimming back hedgerows with all necessary land within ownership. A 4.5 metre wide compacted access track will extend from the entrance to substation compound. The design includes a temporary construction track to cater for deliveries, which will be decommissioned post construction phase (and land reinstated), as well as an operational access track. The track will include geotextile base and filter membrane and 200mm of Clause 804 sub-base.

This existing entrance will be subject to upgrades, including removal of existing roadside sod and stone ditch to provide new gate as presented under notific Kilkenny County Council Reference 25/60391. The entrance will be suitably splayed and has been subject to sight line and autotrack analysis, including modelling of abnormal load delivery for the transformer. Operational sightlines will be maintained by trimming back hedgerows with all necessary land within ownership. A 4.5 metre wide compacted access track will extend from entrance to

substation compound. The design includes a temporary construction track to cater for deliveries, which will be decommissioned post the construction phase (and land reinstated), as well as operational access track. The track will include a geotextile base and filter membrane and 200 mm of Clause 804 sub-base. The substation and solar farm will be unmanned once operational, with trips confined to maintenance staff accessing site by light goods vans. These movements will be limited to 2-4 trips per month.

Operational development will result in a decrease in both volume and scale of vehicles accessing the site when compared to existing agri-generated traffic. Construction phase has potential to increase traffic congestion and/or public safety hazard, with significance of impacts likely to be moderate without appropriate mitigation. Submitted Site Access Report confirms volume of vehicular movements across construction phase will vary with average of c. 10 no. trips per day (equivalent of 1 trip per hour). The subject substation / grid connection element is a subset of wider solar farm HGV numbers. Section 10 of Site Access Report includes a number of focused mitigation measures to minimise impact on existing road users arising from temporary construction phase. These include temporary manual-controlled stop/go system, advance warning signage and booking system for site deliveries to avoid potential access conflicts.

Site Access Report by CSEA Civil and Structural and Construction Environmental Management Plan

Construction
Proposed reinstatement and construction details and phasing will be agreed with associated Local Authorities in advance of works. The contractor will be responsible for arranging for required road opening licences. Road opening licence shall also be applied by principal contractor to local authority.

Operational Phase
Once advanced works are finished, operational effects will be imperceptible over 40 year operational period.

Decommissioning
The on-site substation and 110 kV grid connection will not be removed at end of useful life of proposed project as it will form part of national electricity network. The substation will therefore be retained as a permanent structure and will not be decommissioned.

Overall
Stated Traffic Management Plan is a living document and will be developed through detailed design and construction phase with ongoing consultation with Kilkenny County Council, An Garda Síochána, Emergency Services and other stakeholders.

Roads Response
As per Referrals, the Council's Roads Section have recommended conditions be attached to address following matters:

- Carry out all works to provide required sightlines as indicated on the drawings as set out in submitted Drumdowney Substation and Grid Connection Site Access Report (Dec 2025 - CSEA Civil and Structural Engineering Advisors Ltd);
- Ensure indicated sightlines provided for development access and all boundary treatments are setback behind visibility sightlines;

- All works associated with entrance details, layouts, provision of sightlines to be agreed and confirmed in writing with Municipal District Office and subject to Road Opening Licence;
- Prior to commencement, applicant shall be conditioned to submit a detailed construction programme for development including more detailed traffic impact assessment for construction phase including details of anticipated traffic types and volumes to be broken down in figures (daily, weekly, monthly);
- Conduct pre and post construction condition survey of roads affected by works and construction haul routes in accordance with "Pavement Survey Standard for Regional and Local Roads" in consultation with Municipal District Office;
- Develop Construction and Traffic Management Plan for duration of project as part of Construction Environmental Management Plan CEMP;
- Junction of L34142 and L34141 to be amended from current yield configuration to stop layout and appropriate signage and road markings provided in interests of traffic safety;
- Adopt in principle assessment process outlined in exceptional abnormal load management flow chart to any abnormal loads associated with evelopment;
- Conditions to to comply with TII requirements as set out in Section 5.4 of the submitted Drumdowney Substation and Grid Connection Site Access Report (Dec 2025 - CSEA Civil and Structural Engineering Advisors Ltd);

Waste

Construction

Expected there will be some normal residues/emissions during construction stage. Standard dust and noise prevention reduction measures as per majority of planning applications of all scales to be employed and monitored. As such, pollution and nuisances not considered likely to have potential to cause significant impacts on environment. Construction will be guided by a Construction and Environment Management Plan. Will be some waste produced in the construction of proposed scheme, but this will be subject to normal controls. This will be disposed of using licensed waste disposal facilities and contractors. Scale of waste production in conjunction with use of licensed waste disposal facilities and contractors does not cause concern for likely significant impacts on environment.

Waste will be generated during construction phase and this will be typical of development of this nature. Handling of waste will be in full accordance with statutory legislation and associated guidance. Soil cut for creation of the substation compound will be reused on site as part of the formation of berms and landscaping. In relation to wider solar farm, waste produced at decommissioning stage will be less than construction stage with all components of development re-used or recycled as much as reasonably practicable. Residual disposal will be to a licenced facility. No significant impact is likely.

Operational

At operational stage, there are no significant mitigations measures or methods proposed other than best practice management of the infrastructure. The only waste to be produced during operational phase will be wastewater, with a $5m^3$ foul holding tank emptied periodically by a licensed contractor.

Overall
All waste arising during the construction phase will be managed and disposed of in a way that ensures the provisions of the Waste Management Act 1996 and associated amendments, and regulations of the Waste Management Plan are followed.

Accidents and Natural Disasters
No significant risks on the proposed development site are foreseen, subject to strict compliance with standard environmental controls. The proposed development is not subject to the Seveso Directives or COMAH Regulations. The nature and location of the project means that there is no risk of a major accident or disaster. No significant impact is likely.

Cumalative Impact
Screening assessment also considered potential cumulative impacts which could arise from the proposed development in combination with other known projects in the area. A desktop review of other local projects in the vicinity was undertaken using Kilkenny County Council and An Coimisiún Pleanála planning enquiry systems. No cumulative impacts likely.

Construction Environmental Management Plan
The construction phase of the development is expected to commence within approximately 3 years of any grant of permission and extend for a duration of 24 months. As set out in the submitted Planning and Environmental Statement, this period could change owing to matters outside the control of the applicant. Any impacts will be short-term and restricted by planning conditions in terms of the hours of operation. No permanent negative impacts are anticipated as a result of the construction phase of the project.

The contractor will submit and agree final details of a Construction and Environment Management Plan providing details of all construction methods. Best practice guidance in relation to demolition to be adhered to.

Stated the Construction and Environment Management Plan(CEMP) to updated by the contractor, with detailed construction phase mitigation measures, including those listed in EIAR and NIS submitted. In the event An Comisiúin decide to grant permission a CEMP should be considered a 'live' document and as such will be reviewed on a regular basis to allow changes to construction programme, operations or unforeseen issues be incorporated at any stage throughout the project as deemed necessary by the applicant, agents or relevant authorities. CEMP will be subject to continual review to address any outstanding matters.

Stated in CEMP that:

- Prior to construction the Contractor and the appointed Site Manager will prepare a detailed Method Statement for each section of the cabling based on the detailed design of same. The Method Statements will take into account any mitigation measures where required, or planning conditions set out by An Coimisiún Pleanála;
- None of the works proposed will require a road opening licence from Kilkenny County Council. No cabling works associated with the 110kV underground cable are proposed in public roads;
- A detailed traffic management plan will be agreed with Kilkenny County Council at construction stage, outlining how traffic will be managed during the course of the construction works where construction traffic will use the public road network to access the development site;

- A traffic management plan will be implemented for the delivery of the transformer.
- All existing underground services shall be identified on site prior to the commencement of construction works;
- All site personnel will be inducted in the provisions of the Emergency Response Plan

PART VI CONDITIONS, COMMUNITY GAIN AND BONDS

Should An Comisúin Pleanála consider issues raised in this are addressable and ultimately decide to grant permission the following conditions should be considered for inclusion;

- ✓ 10 year permission;
- ✓ All mitigation and monitoring details within the NIS and EcIA to be fully implemented;
- ✓ Full adherence to all other supporting documentiaton;
- ✓ Construction and Environmental Management Plan including but not limited to
  - Construction hours;
  - Maintenance of local road network;
- ✓ Requirement for an Ecologist Clerk of Works;
- ✓ Control of storage and stockpiling material;
- ✓ Surface water management plan with controls including silt management etc.;
- ✓ Dust suppression and monitoring;
- ✓ Specific transport related conditions;
- ✓ Consultation with District Engineer regarding pre and post condition survey, repair of damages at developers own cost and agreement for strengthening of haul routes;
- ✓ Traffic Management Plan;
- ✓ Advance notice for road closures and extra ordinary loads;
- ✓ Correct control of all fuels and chemicals on site;
- ✓ Protocol for maintenance of telecommunications;
- ✓ Surveying and Monitoring of Archaeology;
- ✓ Full details around reinstatement / decommissioning;
- ✓ Bond;
- ✓ Development Contribution condition;

PART VII OVERALL CONSIDERED VIEW

Kilkenny County Council is recommending to An Coimisiúin Pleanála that they grant permission subject to conditions with particular reference to Kilkenny County Council Roads Section, Environment Section and Fire and Rescue Service responses.

The Roads Section have recommended the following conditions are attached:

- Carry out all works to provide required sightlines as indicated on drawings as set out in submitted Drumdowney Substation and Grid Connection Site Access Report (Dec 2025 - CSEA Civil and Structural Engineering Advisors Ltd);
- Ensure indicated sightlines provided for development access and all boundary treatments are setback behind the visibility sightlines;
- All works associated with entrance details, layouts and the provision of sightlines to be agreed and confirmed in writing with Municipal District Office and subject to Road Opening Licence;
- Prior to commencement, recommend applicant shall be conditioned to submit detailed construction programme for development including more detailed traffic impact assessment for construction phase including details of anticipated traffic types and volumes to be broken down in figures (daily, weekly, monthly);
- Conduct Pre and Post construction condition survey of roads affected by works and construction haul routes in accordance with "Pavement Survey Standard for Regional and Local Roads" in consultation with Municipal District Office;
- Develop Construction and Traffic Management Plan for duration of project as part of Construction Environmental Management Plan CEMP;
- Junction of L34142 and L34141 to be amended from current yield configuration to stop layout and appropriate signage and road markings provided in interests of traffic safety;
- Adopt in principle assessment process outlined in exceptional abnormal load management flow chart to any abnormal loads associated with evelopment;
- Conditions to comply with TII requirements as set out in Section 5.4 of the submitted Drumdowney Substation and Grid Connection Site Access Report (Dec 2025 - CSEA Civil and Structural Engineering Advisors Ltd).

Environment have made the following commentary, and, it is considerd that the following can be incorporated as part of pre-commencement conditions

- Stormwater management withing the substation area deemed as acceptable based on an assumption that any vestige of a ability of area to permeate surface water into the subsoils will suffice especially when area is covered in surface stone being similar to 6F2 or Cl 804/808. Applicant shows distinct twin soakaways and defers provision of their design details in lieu of the aforementioned logic. Proper design demands proper infiltration testing which should be conducted at or near both the plan location and elevation depths of the proposed soakaways and thereafter any such soakaway should be designed to the BRE Digest 365 Soakaway Design. This can be addressed as a of pre-commencement condition;
- Applicant needs to elaborate on methods for provision of lighting and heating for temporary site compound and includemitigation measures necessary to alleviate adverse noise and light emissions resultant to any such provisions. This can be attached as part of pre-commencement condition;

- Significnat temporary site compound shown however unclear how topography of this area will be incorporated into design layout of proposed temporary site compound. This can be addressed as a of pre-commencement condition;
- The applicant has not elaborated any a lightening design for the proposed area nor have they shown any effects from light spill. Given distance to nearest neighbouring property at c.185m, this can be addressed as a of pre-commencement condition;
- The applicant has suggested the site is served by a dedicated borehole/well. This shall be shown on an appropriate site layout of the area. Given distance to nearest neighbouring property at c.185m, this can be addressed as a of pre-commencement condition;
- The access road is formed with a stone material being specified as 40mm to dust, however any dust generating material should ideally be avoided and standard hard surfacing methods employed over affect regions of the site. This can be addressed as part of pre-commencement condition.

Fire and Rescue Service recommend following conditions be attached:

- No contraventions;
- Obligation to obtain relevant certification;
- Provision for fire safety management;
- Provision for adequate fire brigade access;
- Provision for storage and hazard classifications;
- Provision for ire, water and static storage;
- Provision for fire detection and alarm systems;
- Adequate compartmentation for space separation and fire spread;
- Provision for separation systems;
- Adequate suppression systems for premises;
- Provision for environment containment spill kits;
- Provision for portable first aid fire fighting equipment.

On basis of information recieved, substation and associated works to enable grid connection is considered to be acceptable and would not adversely affect amenities of the local and wider local area, local traffic in area, or environment;

The Planning authority is therefore recommending to An Coimisiúin Pleanála that they recommend permission be granted for the substation and associated works to enable grid connection subject to attachment of conditions both standard and specific(as detailed).

Niall Sheehan

25/02/2026

Niall Sheehan
Executive Planner

Denis Malone,
Senior Planner 25/02/26

FSS Seirbhís Náisiúnta Sláinte Comhshaoil

Ospidéal Naomh Dympna, Bóthar Bhaile Átha Í, Ceatharlach, R93 DE62

HSE National Environmental Health Service

St. Dympnas Hospital, Athy Road, Co. Carlow, R93 DE62

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T: 059 913 6574

E: CarlowKilkenny.PEHO@hse.ie

An Coimisiún Pleanala,
64 Marlborough Street,
Dublin 1,
D01 V902

Date: 25th February 2026
Name: An Coimisiún Pleanala
Re: EIAR
Proposed development: 110kV electricity substation and associated loop-in/loop out grid connection infrastructure.
Applicant: Drumdowney Solar Farm Limited
EHIS Reference: EHIS 5556

Planning Reference No. VA10.323985

Dear Sir/Madam,

Please find enclosed the HSE Consultation Report in relation to the above proposal.

The following HSE departments were made aware of the consultation request for the proposed development on 23rd December 2025

HSE South Emergency Management

National Capital Estates Office – Regional AND

Director of National Health Protection

REO Dublin & South East

If you have any queries regarding this report please contact Robbie Doyle, Principal Environmental Health Officer, Carlow/Kilkenny in the first instance at robbie.doyle@hse.ie

Yours sincerely

Robbie Doyle

Principal Environmental Health Officer

AN COIMISIÚN PLEANÁLA
LDG- _____
ACP- _____
16 FEB 2026
Fee: € _____ Type: _____
Time: 9.15 By: Post

FSS Seirbhís Náisiúnta Sláinte Comhshaoil

Ospidéal Naomh Dympna, Bóthar Bhaile Átha Í, Ceatharlach, R93 DE62

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National Environmental Health Service Submission Report

(as a Statutory Consultee under the Planning and Development Acts 2000 (as amended)& Regulations made thereunder)

Date: 25th February 2026

Type of consultation: EIAR

Application Reference Number: VA10.323985

EHIS Reference number: 5556

Applicant: Drumdowney Solar Farm Limited

Proposed Development: 110kV electricity substation and associated loop-in/loop out grid connection infrastructure.

Dear Sir/Madam

Please find below the HSE submission report in relation to the above proposal.

The following HSE departments were made aware of the consultation request for the proposed development:

- Emergency Planning
- National Capital Estates Office – Regional AND
- Director of National Health Protection
- REO Dublin and South East

1. Introduction

The National Environmental Health Service (NEHS) submission report is based on an assessment of documentation accessed following notification to this office on December 23rd 2025. Key documentation reviewed:

- Planning and Environmental Statement which included a Community Consultation Report – December 2025
- Noise Impact Assessment and
- Site Specific Flood Risk Assessment

This report refers only to those sections of the application documents that are relevant to the HSE which have likely significant Environmental Health or Public Health impacts

2. Description of the Project and Physical Environment

The project is a proposed 110kV Gas Insulated Switchgear (GIS) electricity substation, associated grid connection and all ancillary site works.

The applicant, Drumdowney Solar Farm Limited, is seeking a 10 year planning permission for the proposed development which will facilitate the connection of the proposed Drumdowney Solar Farm to the national grid. At the time of writing the proposed solar farm is before Kilkenny County Council under planning reference 25/60391.

The proposed development as described in the Planning and Environment Statement is comprised of the following elements

1) A 110kV Gas Insulated Switchgear (GIS) electricity substation with two -storey GIS substation building, single -storey Independent Power Producer (IPP) control room building, High Voltage (HV) electrical equipment and associated infrastructure (to include transformer, lightning protection masts, back -up diesel generator, fire/blast wall, telecoms pole, perimeter security fencing, security lighting, water and drainage infrastructure, and temporary construction compound) to connect to and serve solar farm development;

2) Associated loop -in / loop out grid connection infrastructure to connect into an existing 110kV overhead transmission line (including underground 110kV cabling, 2 No. new interface towers and decommissioning of ca. 15m of existing 110kV overhead line);

3) Construction and operational access from the public road L34142;

4) All ancillary site development, landscaping and earthworks. The development subject to this application forms part of grid connection and access arrangements which will facilitate the connection of the proposed Drumdowney Solar Farm (Kilkenny County Council Reference 25/60391) to the national grid.

3. Assessment of Public Consultation:

The Planning and Environmental Statement included what was termed a Community Consultation Report for both the proposed solar farm and the proposed substation and grid connection. Reference is made to the process of consultation primarily through door to door visits by a Community Liaison Officer (CLO) and use of a Community Information Leaflet.

It was also noted that there were no reported concerns in relation to the proposed sub-station and grid connection.

If was not evident from the Community Consultation Report whether a CLO will continue to be in place to receive feedback including complaints during future phases of the proposed development including the construction phase.

The National Environmental Health Service (NEHS) recommends that the process of community engagement continues as the development proceeds, if permission is granted. This may include the continued presence of a CLO where feedback including complaints can be received by all of all ages through several means (email, telephone etc.) and acted upon. Aspects such as dust and noise may be an issue during the construction phase in particular.

4. Population and Human Health

No specific assessment of population and human health was found in the documents reviewed. Documents of direct relevance to population and human health reviewed include the Site Specific Flood Risk Assessment and the Noise Assessment. Comment on these and other issue of public health relevance are captured the following sections.

5. Noise

The noise assessment looked at the potential impact of noise from the proposed development on Noise Sensitive Locations (NSLs) during the construction phase and the operational phase. A total of 12 NSLs were identified ranging in distance from the proposed sub-station from 205 metres to over 5,000 metres.

The assessment includes a baseline noise survey to determine background noise levels and a noise impact assessment which (a) examines the impact of construction noise during different phases of the construction period from enabling works through to external finishes, (b) examines the potential impact of operational noise on nearby sensitive receptors and (c) examines the potential cumulative impact in conjunction with other proposed developments in the area.

The prediction provided is that the proposed development will comply with best practice standards in both the construction phase and operational phase.

In the construction phase the noise assessment states on page 22 that an

"examination of the results indicate the construction noise without mitigation is predicted to be within the noise limits set out by BS 5228-1".

A number of noise mitigation measures for the construction phase are listed under 5.1.3 General Recommendations includes the selection of quieter plant and equipment, noise controls at source and screening plus noise monitoring.

The NEHS recommends that the times of construction activity are set as a condition of planning if planning permission is granted. Monday to Friday, Saturdays, Sundays and Public Holidays.

The NEHS recommends the application of the mitigation measures described under 5.1.3 of the Noise Assessment Report. Some of these measures may also deliver Green-House Gas emissions reductions if for example battery powered plant and equipment is utilised.

6. Air Quality

No specific reference could be found to the protection and promotion of air quality in the Planning and Environmental Statement. A key issue of relevance in the construction phase will be potential impact of dust and exhaust emissions on nearby sensitive receptors.

A Construction Environmental Management Plan (CEMP) should be included detailing dust control and mitigation measures. Measures should include:

- Sweeping of hard road surfaces
- Provision of a water bowser on site, regular spraying of haul roads
- Wheel washing facilities at site exit
- Restrict speed on site
- Provide covers to all delivery trucks to minimise dust generation
- Inspect and clean public roads in the vicinity if necessary
- Material stockpiling provided with adequate protection from the wind
- Dust monitoring at the site boundary
- Truck inspection and maintenance plan

The NEHS recommends the inclusion of a detailed Dust Management Plan, perhaps within a wider Construction Environmental Management Plan (CEMP) to mitigate the potential harm to nearby sensitive receptors.

7. Climate Action (Mitigation and Adaptation)

Climate change is widely regarded as the greatest threat to global health in the 21st century (World Health Organisation and others) and is therefore considered relevant in the context of population and human health.

There are two aspects to climate action that address the public health threat posed by climate change. The first is reducing green-house gas (GHG) emissions through the process of mitigation. The second is adapting to climate change in the face of more frequent and severe weather events and the gradual changes brought about by temperature changes and changing precipitation patterns.

Much is written in the Planning and Environmental Statement on the legal and policy environment globally, nationally and more specific to the Kilkenny County Development Plan and Kilkenny County Council Climate Action Plan. No reference to the National Adaptation Framework 2024 could be found under the Planning Policy Context.

In the context of mitigating green-house gas emissions during the construction and operational phase of the proposed development no detail could be found in the Planning and Environmental Statement. For example no detail was found on how procurement decisions will influence the amount of embodied carbon in construction materials or how the use of plant, machinery and vehicles will reduce GHG emissions.

In the context of adapting to climate change the Planning and Environment Statement lacks an assessment of the climate risks posed for the proposed development over the expected minimum timeframe of the proposed development (40 years for the solar farm) and longer for this proposed development of substation and grid connection. The types of hazards one might expect to see assessed include numerous severe weather events such as floods, windstorms, drought, and possible wildfires, as well as more gradual onset risks associated with changing precipitation patterns and warming temperatures over time.

It is noted from the Flood Risk Assessment that the site is not at risk of fluvial, tidal/coastal, pluvial or groundwater flooding.

The NEHS recommends that the proposed development minimise GHG emissions in both construction and operations by for example, procuring construction materials low in embodied carbon, utilising plant, machinery and vehicles not dependent on fossils fuels, supporting active travel for construction personnel, harvesting rainwater for some uses and other measures that contribute towards the national target of a carbon neutral and resilient economy by 2050.

The NEHS recommends that a comprehensive Climate Change Risk Assessment is undertaken for the proposed development using future projections 40 years and beyond. The results of the assessment will determine the adaptation measures required to protect the proposed development.

6. Conclusions

Should permission be granted for the proposed development, the National Environmental Health Service makes the following recommendations:

- **That the process of community engagement continues as the development proceeds, if permission is granted. This may include the continued presence of a CLO where feedback including complaints can be received by all of all ages through several means (email, telephone etc.) and acted upon. Aspects such as dust and noise may be an issue during the construction phase in particular.**
- **That the times of construction activity are set as a condition of planning if planning permission is granted. Mondays to Fridays, Saturdays, Sundays and Public Holidays**
- **The application of the mitigation measures described under 5.1.3 of the Noise Assessment Report. Some of these measures may also deliver Green-House Gas emissions reductions if for example battery powered plant and equipment is utilised.**
- **The inclusion of a detailed Dust Management Plan, perhaps within a wider Construction Environmental Management Plan (CEMP) to mitigate the potential harm to nearby sensitive receptors.**

- **In the context of Climate Change Mitigation that the proposed development minimise GHG emissions in both construction and operations by for example, procuring construction materials with low embodied carbon, utilising plant, machinery and vehicles not dependent on fossils fuels, supporting active travel for construction personnel, harvesting rainwater for some uses and other measures that contribute towards the national target of a carbon neutral and resilient economy by 2050.**
- **In the context of Climate Change Adaptation that a comprehensive Climate Change Risk Assessment is undertaken for the proposed development using future projections 40 years and beyond. The results of the assessment will determine the adaptation measures required to protect the proposed development.**

If you have any queries regarding any of the report, the initial contact is Robbie Doyle, Principal Environmental Health Officer who will refer your query to the appropriate person.

Yours sincerely,

Niall Roche

Niall Roche

Network Support Unit Member

Robbie Doyle

Robert Doyle

Principal Environmental Health Officer

Bonneagar Iompair Éireann
Transport Infrastructure Ireland

The Secretary
An Coimisiún Pleanála
64 Marlborough St.
Dublin 1
D01 V902

by e.mail; sids@pleanala.ie

Dáta | Date	Ár dTag | Our Ref.	Bhur dTag | Your Ref.
29 January 2026	TII26-134698	

Re: Strategic Infrastructure Development Application for a Proposed 110kV Gas Insulated Switchgear (GIS) electricity substation, associated grid connection and all ancillary site works at Rathpatrick, County Kilkenny

ACP case ref. VA10.323985

Dear Sir / Madam,

The Authority acknowledges receipt of referral of the above proposed Electricity Development Application on behalf of Drumdowney Solar Farm 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 Commission 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.

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó I gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag www.tii.ie
TII process personal data in accordance with its Data Protection Notice available at www.tii.ie

www.tii.ie info@tii.ie +353 (01) 646 3600 Parkgate Business Centre, Parkgate Street, Dublin 8, D08 DK10, Ireland

Section 4.3.2 of the Planning and Environmental Statement that accompanied the application indicates that it is proposed to access the site via a single entrance from the L34142. 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.

The Commission will be aware of the live and related planning application with Kilkenny County Council under planning file ref. 25/60391 (Drumdowney Solar Farm Limited); please find attached a copy of TII observations submitted to the Council in relation to that application in the interests of completeness.

2. National Road Network Maintenance and Safety

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

2.1 Proposed Substation Component Haul Route

Section 4.3.2 of the Planning and Environmental Statement details a delivery route for the proposed development from port of entry at Belview indicating that the N29 and N25, national roads, will be utilised. No temporary works to the national road network are identified as being required.

Notwithstanding, in the interests of clarity, TII advises that 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.

Section 4.3.2 of the Planning and Environmental Statement outlines that the Applicant is happy to confirm that it will reference the above requirements in the final CTMP and will consult

with TII, and other parties where necessary, prior to the commencement of development. TII welcomes such commitment.

2.2 Structures

Section 4.3.2 'Site Access/Sightlines' of the Planning and Environmental Statement submitted confirms that two abnormal load deliveries will be made to the substation site as part of the construction phase. It is also stated that the Applicant is familiar with the requirements for Exceptional Abnormal Loads (EAL) introduced in 2024, which will be met in full.

In the interests of clarity, TII outlines the following observations 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.

TII welcomes the acknowledgement included in Section 4.3.2 of the Planning and Environmental Statement that the requirements for Exceptional Abnormal Loads (EAL) introduced in 2024 will be met in full and would welcome such commitment reflected in a condition of any permission granted.

2.3 Grid Connection Routing

Section 2.2.4 of the Planning and Environmental Statement states that in order to connect to the transmission network, it is proposed to connect the 110kV substation into the national grid via a 'loop -in / loop -out' underground 110kV cable grid connection which will connect into the existing 110kV Great Island to Waterford overhead line.

TII confirms that the grid connection option considered does not directly impact the national road network.

Notwithstanding, and in the interests of clarity, TII 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.

In relation to high voltage transmission infrastructure development, regard should also be had to the 'Electricity Transmission Infrastructure Development – Roads Sector Engagement Framework' included in DoT Circular RW 07 of 2025.

2.4 Greenways

In relation to any Greenway or Active Travel proposals in the vicinity of the proposed works, consultation with Kilkenny 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 Commission in dealing with this matter.

Yours faithfully,

Michael McCormack
Senior Land Use Planner

Bonneagar Iompair Éireann

Kilkenny County Council
Planning Department
County Hall
John Street
Kilkenny

Dáta | Date: 11/08/2025

RE: Planning Ref.: 2560391

Applicant: Drumdowney Solar Farm Limited

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) acknowledges referral of the above planning application for a solar farm development over 4 no. land parcels with with associated works including crossings of the N25 and N29.

The application submitted contains insufficient information to enable TII to undertake an assessment of the potential impacts of the proposed development on the national road network. Having regard to the information submitted, TII is not satisfied that the proposed development or construction works associated including proposed cable crossings have been adequately described or depicted in submitted documentation and do not appear to have had regard to the status of the N25 and N29 as part of the national road network and therefore subject to DoECLG *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012) and TII Publications compliance. As a result, the proposal does not appear to consider or propose mitigation to ensure the maintenance of the safe and efficient operation of the national road network.

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. Individual proposals, by observing provisions of official development policy and in relation to national road network maintenance and safety must therefore proceed only where 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.

As the Council is aware, *Project Ireland 2040*, the *National Planning Framework* and *National Development Plan 2021 – 2030*, outline the key sectoral priority of maintaining Ireland's existing national road network to a robust and safe standard for users. 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 N25 and N29 provide vital interregional connectivity and are subject to the maximum 100 kmh speed limit in the vicinity of the subject application site. 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. In addition, the application does not identify nor consider interactions with the N25 Waterford to Glenmore Scheme which is is subject to Exchequer funding and NDP scheduling priorities but has progressed to identify a preferred alignment option in the vicinity of 'parcel 2' and cable routing of the proposed development.

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 *Southern Regional Spatial and Economic Strategy* (RSES). The sustainable maintenance and protection of the strategic capacity and safety

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of the national road networks is amongst the objectives of RPO 140 *International Connectivity* of the RSES. The requirement to maintain the strategic transport function of the national roads network in accordance with national policy is also at RPO 151 *Integration of Land use and Transport* of the RSES.

A review of the application shows that elements of the proposal will directly and indirectly interact with the national road network. Having regard to official policy and in the interests of national road network maintenance and safety TII provides the following observations for the Council's consideration:

1.0 Official National Roads Policy

The national road network consists of built assets including interchanges and associated infrastructure such as drainage, energy supply for lighting and traffic management, and lighting gantries. As noted, 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 direct construction access to the proposal site is facilitated via the local road network.

As part of TII's responsibilities for managing and improving the country's national road network, the Authority sets development guidance and standards for traffic and road assessments and construction that may be necessary by reason of proposed development location, scale or typology to be prepared to accompany applications for developments or works. Technical guidance and standards are contained in TII Publications, available at https://www.tiipublications.ie/

Furthermore, 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 national road network technical and standards requirements as prescribed in TII Publications.

The application for a solar farm over 4 no. dispersed land parcels includes 38kV cable "interconnector" cables between each parcel to connect to a substation in Rathpatrick townland to the south east of the N25 and N29 roundabout, to be the subject of a separate Strategic Infrastructure Development application. By reference to submitted site location and submitted "*Site Layout and Overview*" drawings, there appears to be proposed 3 no. crossings of the national road network: 2 no. on the N25 and 1 no. on the N29 where a maximum 100 kmh speed limit applies.

The following direct interactions with the national road network are identified in the submitted application:-

- The proposed development appears to indicate 3 no. national road network "interconnector" 38kV cable crossings:
    - East / West crossing of the N25 in the vicinity of the staggered junctions of the L7523 and L7536 (from proposed Parcel 1 to 2).
    - North / South crossing the N25 in the vicinity of the L7469 (from proposed Parcel 2 and 3). The L7469 travels of the N25 on the *Airmount Road Overbridge* (Eirspan Strcuture ID CG-N25-001.00) which is a TII Structure.
    - East / West crossing of the N29 in the vicinity of the junctions with the L3407 and L3414 (from Parcels 2 and 3 to future substation).

Indirect interactions with the national road by the proposed development network may occur by virtue of:-

- visual impacts by the physical elements of the proposed development including glint and glare from the solar farm element of the proposal on the N25, and
- the proposed construction haul route indicated in submitted documentation that includes the N25 and N29.

TII is seriously concerned that the application submitted does not clearly identify direct or indirect interactions with the national road network by the proposed development. The application does not appear to recognise official national roads policy. TII further notes with concern that there appears to be 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.

2.0 National Road Network Crossings

TII has identified a number of significant implications for TII and road authorities in the management and maintenance of the strategic national road network resulting from the laying of high voltage electricity cabling in the national road reservation, including;

- Impacts on embankments, bridges, drainage and road furniture infrastructure leading to future maintenance liabilities,
- Impediments to future maintenance and operations activities, such as safety barrier repair and French drain renewal,
- Impediments to future routine network improvements such as pavement overlay and strengthening, installation of new verge-side signs and other road furniture,
- Impacts on network traffic flows during installation,
- Impediment to future on-line upgrades of national roads because of the implications to road authority / TII in having to incur the additional costs of moving underground cables in order to accommodate the road improvements.

Proposals to lay cable in the national road reservation, including the construction of associated joint bays, have the potential to impact road authorities and TII in undertaking future maintenance and improvement requirements. There may also be additional cost implications to national road improvements and maintenance resulting from the presence of high voltage cabling within the national road reservation.

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 to demonstrate clearly that the 'optimal solution' in accordance with CAP 24 requirements is proposed in the subject application. 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.

Other consents or licences may be required from the road authority for any trenching or cabling proposals crossing the national road. The Authority 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.

In relation to HDD crossing, a third party seeking to cross a motorway will require Works Specific Deeds of Indemnities or consent from TII in accordance with Section 53 of the Roads Act, 1993. Arrangements for third party

access are also likely to be required. Contact should be made with thirdpartyworks@tii.ie to progress the technical elements where proposals for a crossing of a motorway / dual carriageway are developed.

In addition, in respect of proposed horizontal directional drilling (HDD) crossing, the Authority sets the following general requirements for directional drilling crossing under a motorway/dual carriageway that include:

- The launch and reception pits for the crossing are located outside the motorway/dual carriageway boundary,
- The cabling will be installed at such depth so as not to conflict with the drainage for the motorway/dual carriageway,
- Neither the Works nor the cable crossing will damage or interfere with the motorway/dual carriageway,
- Any maintenance and/or future planned upgrades of the cabling at the crossing location can be carried out without access to the motorway/dual carriageway boundary,
- There are no bolted joints in that part of the crossing within the motorway/dual carriageway fence-line,
- A pre and post construction survey shall be required along the length of the crossing over the extents of the motorway/dual carriageway boundary,
- Specific requirements may also arise for these proposed works.

The description of development in the submitted application refers to HDD crossings of the N25 and N29. However, review of the submitted *Drumdowney Solar Farm Electrical Infrastructure - Construction Methodology*, REV02, dated 16.06.2025, *Drumdowney Solar Farm Construction Environmental Management Plan*, REV C, dated 25.06.2025, and submitted *Site Layout Overview and Context* drawings propose deviation from the above general guidance and are contradictory.

- **Proposed East / West crossing of the N25 in the vicinity of the staggered junctions of the L7523 and L7536 (from proposed Parcel 1 to 2).**

  The submitted *Construction Methodology* states that all national road network crossings will be by HDD crossing in accordance with "TII Guidelines". However, this crossing is stated to be in the verge of the N25 and thus contrary to the above TII requirements. Review of submitted *Site Layout Plan - Sheet 6*, Drawing No. LD_DRMDY 1.6 finds insufficient information to clarify the crossing proposal and potential interactions with the N25. TII notes that this drawing labels the proposed crossing "*HDD 1 launch and reception pits*".

- **North / South crossing the N25 in the vicinity of the L7469 (from proposed Parcel 2 and 3). The L7469 travels of the N25 on the *Airmount Road Overbridge* (Eirspan Structure ID CG-N25-001.00) which is a TII Structure.**

  The submitted *Construction Methodology* states that all national road network crossing will be by HDD crossing and that this crossing of the N25 will be by HDD across a bridge. The *Airmount Road Overbridge* (Eirspan Structure ID CG-N25-001.00) appears to form part of the application site. HDD crossing is underground and therefore impossible to achieve in a bridge structure. Review of *Site Layout Plan - Sheet 30* and *Sheet 31*, Drawing Nos. LD_DRMDY 1.30 and LD_DRMDY 1.31 do not provide any information on the proposed crossing including no "HDD" label.

  The *Airmount Road Overbridge* (Eirspan Structure ID CG-N25-001.00) oversails the N25. As such, this is a TII Structure where works impacting that Structure are subject to compliance with TII Publications. The planning authority is reminded of the requirements of TII Publications that include the Technical Acceptance requirements for the assessment, alteration, modification, strengthening and repair of all road structures to be prepared in accordance with TII Standard: '*Technical Approval of Road Structures on Motorways and Other National Roads for structures*' (TII Publication Number DN-STR-03001). The necessary TII technical approval does not accompany the application.

Having regard to the foregoing, no information on the proposed HDD crossing of the N25 in this location has been provided with the application.

- **East / West crossing of the N29 in the vicinity of the junctions with the L3407 ad L3414 (from Parcels 2 and 3 to future substation).**

  Review of submitted *Site Layout Plan - Sheet 32*, Drawing No. LD_DRMDY 1.32 finds insufficient information in respect of the extent of the 29 and proposed crossing potential interactions. TII notes that this drawing labels the proposed crossing "*HDD 3 launch and reception pits*".

With concern, it does not appear that information has accompanied the subject application confirming the feasibility of the proposed N25 and N29 crossings. Therefore, TII consider that insufficient information has been provided which needs to be addressed prior to a decision been made on this application.

TII reiterates that technical constraints are encountered where there a multiplicity of public and private infrastructure routing proposals resulting in multiple crossings of the national road network in the vicinity of one another. TII strongly recommends that proposed crossing locations are audited to ensure co-ordination with other current and planned crossings.

3.0 Glint & Glare Assessment

Where warranted, appropriate levels of screening and mitigation should be identified and provided for in any approved scheme to avoid glint/glare impact on the national road network. TII nots the Submitted *Glint and Glare Assessment* and *Landscape Management Maintenance Schedule* both by Macroworks, dated June 2025.

Having regard to this assessment and matching mitigation, in respect of the N25 specific mitigation will be required to ensure the protection of the safe and efficient operation of the national road network.

In this regard, a glint and glare monitoring programme must be identified for the applicant to adhere to which will allow for additional mitigation if necessary and amendment/removal of any elements of the Solar PV Farm that result in glint/glare and impact on road safety on the national road network. The applicant shall be responsible for any costs associated with required mitigation and monitoring.

4.0 National Road Network Maintenance and Safety

The submitted *Construction Environmental Management Plan (CEMP)* and *Construction Methodology* commit to the preparation of a construction traffic management plan (CTMP) as part of an approved project.

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 PPP concession and MMaRC Contractors as part of the proposed *Construction Traffic Management Plan (CTMP)*.

In the Authority's opinion, where the national network is to form part of construction traffic haul routing, a number of operational issues related to the development proposal are required to be resolved as part of any *Construction Traffic Management Plan* (CTMP) to address concerns relating to national road network maintenance and road safety. 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 are safeguarded the following is advised:-

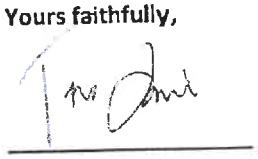
- The applicant/developer should consult with all PPP Companies, MMaRC Contractors and road authorities over which the haul route traverses to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is maintained.
- Where temporary works within any PPP Concession or MMaRC Contract Boundary are required to facilitate construction traffic 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.
- 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.
- 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 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.

Conclusion

The Authority is of the opinion that insufficient data has been submitted with the planning application to demonstrate 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. The national road network includes its interchange, structures, and therefore consists of built assets and associated infrastructure such as drainage, energy supply for lighting and traffic management and lighting and signage gantries. Therefore, TII advises that it is essential that plans and details which accompany planning applications must demonstrate the protection of the safety, efficiency and physical integrity of the national road assets.

Please acknowledge receipt of this submission in accordance with the provisions of the Planning and Development Regulations, 2001 as amended.

Yours faithfully,



on behalf of
Land Use Planning Unit

**Note: In accordance with the provisions of section 13 of the Roads Act 2015, Transport Infrastructure Ireland (TII) is the operational name of the National Roads Authority with effect from 1 August 2015.*

All planning application referral documentation, including applications, submission acknowledgments, further information notifications and decisions should be notified electronically to TII at landuseplanning@tii.ie. TII would appreciate your Authority's assistance on this matter.

Bonneagar Iompair Éireann
Transport Infrastructure Ireland

Kilkenny County Council
Planning Department
County Hall
John Street
Kilkenny

Dáta/Date: 22 January 2026

Re: Planning Ref.: 2560391
Applicant: Drumdowney Solar Farm Limited

Dear Sir / Madam,

TII acknowledges receipt of Further Information in relation to the above application and having reviewed the relevant documentation, the Authority advises that TII's position on the subject application remains as set out in TII's initial submission on this application of 11 August 2025.

In addition to the above, the following clarifications relate:

- TII welcomes clarification that the crossing of the N25 proposed in the vicinity of the Airmount Road overbridge is by HDD method.

- TII also notes proposals to retain launch / reception pits within the N25 reservation for the northern N25 crossing which is not supported by TII. Alternative routing from L7523 to L7469 seems available which would not necessitate launch or reception pits within the N25 corridor. TII's position relating to HDD Crossings, including requirements for Section 53 consent remains as set out in TII's submission on the initial application.

- TII remains concerned with the level of detail provided in relation to electricity cable connection crossings of the national road network. The Council shall ensure that any consent granted requires agreement of all national road crossings with the roads authority and in the interests of safeguarding the strategic function and levels of safety of the national road network all launch and reception pits for HDD crossings shall be outside the national road reservation.

Please acknowledge receipt of this submission in accordance with the provisions of the Planning and Development Regulations, 2001 as amended.

Yours faithfully,

on behalf of
Land Use Planning Unit

**Note: In accordance with the provisions of section 13 of the Roads Act 2015, Transport Infrastructure Ireland (TII) is the operational name of the National Roads Authority with effect from 1 August 2015.*

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