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27th March 2026

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Re: An Coimisiún Pleanála Reference ABP-323985-25: 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 Ataeemore or Blackneys, Ballyhobuck, Ballyrahan, Carriganurra, Charlestown, Davidstown, Drumdowney Lower, Drumdowney Upper, Gorteens, Grogan, Kilmurry, Nicholastown, Rathpatrick, Scartnamoe, Tinvaucoosh and Treanaree in County Kilkenny.

Dear Sir/ Madam

We act on behalf of Drumdowney Solar Farm Limited, applicants in the above matter. Further to recent correspondence, we welcome the opportunity to comment on the shared observations on the application from the following parties:

- Kilkenny County Council;
- Transport Infrastructure Ireland (TII);
- Uisce Éireann;
- Department of Housing, Local Government and Heritage;
- HSE.

This response is structured as follows to address the observations of three grouped stakeholders:

1. Kilkenny County Council;

2. Prescribed Bodies.

From a review of the submissions, we note and welcome that there are no objections to the proposed development from any of the observation parties. It is notable also that there are no objections on the file from any local residents or community groups. The project is supported locally.

01. Kilkenny County Council

The report from Kilkenny County Council considers the proposed development in detail and makes a clear recommendation to the Commission that permission should be granted subject to the applied planning conditions.

We welcome the following assessment conclusions:

- That there is strong policy support to accelerate the grid connection for advanced renewable energy projects.
- That the proposed substation "is inland development, set back from the public road and residential properties".
- That potential noise and dust from construction phase "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".
- That "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".
- That flood risk on the site is low. That there will be no material impact on water resources arising from the construction phase, and the works include "bolstering of hedgerows, new planting and other measures in support of positive biodiversity enhancement".
- That 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. The Ecological Impact Assessment "confirms areas of localised hedgerow removal will be offset by considerable landscaping in support of principle of biodiversity gain across local area".
- That the prepared Landscape and Visual Impact Assessment (LVIA) confirms that the proposed development will not result in any visual impacts in the local area. That no cumulative impacts are likely.
- That the Kilkenny Fire/Building Control Authority have no objection in principle to the proposed development from a fire safety perspective.

As summarised in the internal reports, the Roads Section in the Council recommend some planning conditions related to forming and maintenance of sightlines, construction traffic management, pre and post condition road surveys. These underpin commitments already made in the application by the Applicant, who are happy with same.

Similarly, the Environmental Section require infiltration testing ahead of finalisation of the drainage design for the substation which is based on accepted EirGrid standards. Final soakaway design can be confirmed with the Council on foot of this, as requested. Elsewhere, the laying out of the temporary construction compound will be agreed with the Council, inclusive of component parts. Again, this is standard practice.

The opinion of the Council objectively concludes that the proposed development "is considered to be acceptable and would not adversely affect amenities of the local and wider local area, local traffic in area, or environment".

02. Prescribed Bodies

UISCE ÉIREANN

We note the observation from Uisce Eireann dated 23rd February 2026 on the file, which confirms they have no assets in the vicinity of the proposed development and it is therefore anticipated "that there will be no adverse impact on any assets or sources belonging to Uisce Eireann.

HSE

The submission by the HSE dated 25th January has been reviewed in detail. The report categorises the consultation as an Environmental Impact Assessment Report (EIAR) and structures its commentary using some standard EIAR chapters. The Commission will note that the subject application does not include an EIAR. Notwithstanding, the Applicant is happy to address the key points raised in their submission.

Post Planning Community Consultation

The Applicant notes the HSE acknowledgment of the community consultation undertaken as part of the planning application. As stated in the Planning and Environmental Statement, this consultation was undertaken between the 15th May and 17th June 2025. It consisted of a personal visit from the applicants experienced Community Liaison Officer (CLO) to 54 no. households in the vicinity of the proposed solar farm site, including the proposed Drumdowney substation and grid connection. During the consultation the "feedback" was very positive. No specific concerns were raised in relation to the proposed substation and grid connection. People were also aware that there would be an opportunity through the planning application process to make a submission to An Coimisiún Pleanala should there be any additional concerns identified through inspection of the planning application documentation. It is noted that no such submissions/objection have been made.

The HSE has also queried what community engagement will be carried out post planning. In this context, it should be noted that prior to the commencement of construction a Stakeholder Engagement Plan (SEP) will be prepared and will be implemented for both the solar farm and the

Drumdowney substation and grid connection. The SEP will ensure transparent communication with local communities, government, and environmental groups. Key activities will include continued local community consultation, addressing environmental/social impacts, managing grievances, and offering community benefits. In addition to these activities, the SEP will:

- Identify all interested parties: local residents, landowners, local government/council, environmental NGOs, nearby businesses, and utility companies.
- Use diverse methods - newsletters, website updates, and direct meetings—to ensure accessibility and transparency in relation to the development.
- Communicate updates and proposed mitigations for visual impact, noise, dust, land use, and access.
- Implement a clear, accessible process for receiving and managing complaints or grievances from the community, ensuring timely responses.
- Identify ways to share benefits, such as supporting local businesses or supporting community projects.
- Regularly review and update the plan to ensure effectiveness and respond to changing community sentiments.

Community engagement will continue throughout the solar farm's lifetime. As the solar farm moves into this operation phase, the frequency of communication may reduce and evolve to be one of engaging stakeholders in the benefits of solar energy, i.e. site visits for community groups and schools. It is not proposed that there would be any need for community consultation in relation to the permanent operation of the substation and grid connection which will be owned by ESB Networks and will form part of the electricity transmission network managed and operated by EirGrid.

Noise & Air

The HSE summaries and notes the findings of the submitted Noise Impact Assessment (NIA), which complies with relevant standards. The proposed hours of construction activities are set out clearly in the application and prescribe that work will only be conducted in normal working hours of Monday to Friday 08:00 to 18:00 and Saturday 08:00 to 13:00, with no works on Sundays or Bank Holidays except in exceptional circumstances or in the event of an emergency. All mitigation measures in the NIA will be adhered to, as requested.

As required, a detailed dust management strategy for the construction phase will be set out in the final CEMP to be submitted to and agreed with Kilkenny County Council.

Climate Change Adaption

The HSE has requested that a Climate Change Risk Assessment is undertaken for the proposed substation and grid connection to determine the adaptation measures required to protect the proposed development.

In this context of this development, the proposed Drumdowney substation and grid connection will be owned by ESB Networks who build and carry out maintenance on Irelands electricity transmission

system. This system is managed and operated by EirGrid. The development is therefore subject to the Electricity and Gas Networks Sectoral Adaptation Plan 2025 (EGN SAP), published in November 2025. This is the second statutory plan designed to prepare Ireland's energy infrastructure for the long-term impacts of climate change. It was developed by the Department of Climate, Energy and the Environment (DECC) in collaboration with EirGrid, ESB Networks, and Gas Networks Ireland. The EGN SAP 2025 has been developed on the basis of the latest climate change information for Ireland (e.g., Met Éireann's TRANSLATE climate change projections, the EPA's National Climate Change Risk Assessment), with input from many stakeholders.

EirGrid's Engineering and Asset Management team is responsible for evaluating and implementing climate adaptation measures across the Irish transmission system, which will include the Drumdowney substation and grid connection. Through a multi-faceted approach including climate resilience studies, grid infrastructure assessments, technology upgrades and stakeholder collaboration, EirGrid identify assets most vulnerable to climate change and develop targeted plans to enhance resilience and mitigate potential risks to the transmission system. The EGN SAP 2025 provides a summary of current climate impacts and consequences for Irelands transmission system.

- Windstorms (e.g. as experienced during Storm Isha, Storm Darragh and Storm Éowyn) have resulted in damage to the electricity distribution network due to direct wind damage and tree strikes resulting in loss of power to a large number of customers over wide geographic areas. These storms highlight the vulnerability of the distribution network to windstorms. In contrast, windstorm damage to the transmission networks, which would include the proposed 110kV Drumdowney substation and grid connection, was limited with faults to the network fixed during or shortly after the event[1].
- Lightning has directly impacted upon electricity infrastructure resulting in power outages. For example, during Storm Eleanor in January 2018; approximately 5,000 customers lost supply due to lightning and high winds.

In order to assess changes in levels of climate impacts in the future, climate projection data was employed to assess changes in levels of hazards, exposure, potential impacts, and associated sectoral consequences for the electricity sector. EGN SAP 2025 concluded that:

- Based on recent experiences, windstorms have been identified as having a critical level of consequence for the transmission network in the current period, and the level of consequence associated with windstorms is projected to remain critical under future climate conditions.
- Lightning has been identified as a high priority risk to the electricity transmission network with the level of consequence identified as substantial in the current period and as critical in the future period.
- Risks associated with flooding (coastal, surface water, and fluvial) have been identified as a medium priority risk for the electricity network subsector. Sea level rise and projected increases in

[1] For information purposes it should be noted that the distribution network mainly comprises of low voltage substations, poles, overhead electricity wires, and underground cables whereas the transmission network consists of high voltage lines and electricity substations that provide the physical link between generators, large demand customers and the distribution network.

the frequency of extreme precipitation events are expected to increase the exposure of transmission and distribution assets to coastal, fluvial and surface water flooding.

The above hazards, risks and associated mitigations (where necessary) have been considered in the immediate context of the proposed Drumdowney substation and grid connection, refer Table 01 below.

Table 1.1. Climate Risk Assessment

Hazard	Risk	Drumdowney Substation and Grid Connection Commentary	Electricity and Gas Networks Sectoral Adaptation Plan 2025 Commentary
Extreme wind	Risk of disruption and damage to energy transmission and distribution infrastructure due to extreme wind	The Drumdowney substation and grid connection has been designed for the purposes of the application to An Coimisiún Pleanála in accordance with EirGrid specifications. The detailed design of the substation and grid connection will be subject to EirGrid approval prior to the commencement of development. Over the lifetime of the development, its resilience to climate change adaptation will be reviewed in the context of the EGN SAP, or its successors, which will be based on the most current climate information for Ireland. Appropriate mitigations will be employed in the management and maintenance of the substation and grid connection to ensure that the risk of disruption to the transmission infrastructure is suitably managed.	The dispersed nature of the electricity distribution network contributes to current levels of vulnerability to windstorms. This is not necessarily the case for the transmission system which is more resilient. Notwithstanding, the measures to manage extreme wind include: • ESBN Investment Plans • ESB Networks Winter Resilience Plans • Timber Cutting and Vegetation Management • Digital Modelling • Automation Programmes • Storm Risk Mitigation Strategies • Monitoring and Maintenance Programs
Lightning	Risk of disruption and damage of energy transmission and distribution infrastructure due to lightning	As per above, the Drumdowney substation and grid connection has been designed and will be constructed, operated and maintained in accordance with EirGrid specifications. In addition, it should be noted that a minimum lightning protection system to achieve lightning protection level (LPL) level	Currently, the electricity sector considers lightning as part of energy system operation and development with activities including: • Upgrades and Retrofits to Overhead Lines: EirGrid will continue to review their overhead lines to assess if additional anti-

Hazard	Risk	Drumdowney Substation and Grid Connection Commentary	Electricity and Gas Networks Sectoral Adaptation Plan 2025 Commentary
		IV shall be installed. As part of detailed design, a risk assessment shall be conducted based on the methods contained in IEC 62305 Protection Against Lightning, Part 2, Risk management. This risk assessment shall determine whether a more onerous lightning protection system (LPS) is required at the substation. The design of the LPS shall be based on the methods contained in IEC 62305 Protection against lightning, Part 3, Physical damage to structures and life hazard (i.e. the protection angle and rolling sphere methods). Use of the surrounding topography to assist in lightning protection is permitted. The substation compound equipment and control room shall be protected against damage from lightning strikes. A design, including lighting shielding profile drawings shall be submitted to EirGrid for review with the substation layout drawings. Down conductors shall be clamped at intervals along the lightning masts, and connected to the main substation earth.	lightning devices, spine ball ionisers, and earth wires are needed. • Replacement and Refurbishment: EirGrid will continue to assess their critical assets to identify if any require refurbishment or replacement with shield wire. • Lightning Arrestors: ESBN is reviewing their network to identify if sections of the lines require additional lightning arrestors to be implemented. • Monitoring: ESBN continually review their network to identify areas that are most prone to lightning related faults and develop tailored workplans to outline additional mitigation measures that will be implemented.
Flooding (Fluvial, surface water, and groundwater)	Risk of disruption and damage to energy transmission and distribution infrastructure due to extreme precipitation and flooding (fluvial, surface water, and groundwater)	As per above, the Drumdowney substation and grid connection has been designed and will be constructed, operated and maintained in accordance with EirGrid specifications. In addition, it should be noted that the current application to An Coimisiún Pleanala includes a Site Specific Flood Risk Assessment (SSFRA) which can be summarised as follows:	Given the locational characteristics of the proposed Drumdowney substation and grid connection, and the findings of the SSFRA as summarised over, the need for climate change adaptation measures are not considered necessary. In any circumstances where this changes, both EirGrid and ESB Networks will be responsive to any required adaption measures.

Hazard	Risk	Drumdowney Substation and Grid Connection Commentary	Electricity and Gas Networks Sectoral Adaptation Plan 2025 Commentary
		• A SSFRA appropriate to the type and scale of development proposed, and in accordance with 'The Planning System and Flood Risk Management Guidelines – DoEHLG-2009' has been undertaken. • The proposed development site has been screened, scoped and assessed for flood risk in accordance with the above guidelines. • 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 the requirements of the Justification Test. • Overall, the flood risk to the specific area of the proposed development site 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 to be appropriate from a flood risk perspective.	

As identified above, climate adaptation measures and considerations are integrated into the planning and project development stages of all transmission infrastructure projects which are owned and/or managed by EirGrid and ESB Networks. The Drumdowney substation and grid connection will be subject to EirGrid's and ESB Network's own grid development plans which are updated frequently to ensure compliance with evolving climate policies. As critical stakeholders in the energy sector,

liaising closely with other stakeholders such as DECC, EPA, Met Eireann etc, EirGrid and ESB Networks have a mandate to develop site-specific measures to protect critical grid infrastructure from the effects of climate change. This is evident in the EGN SAP 2025 as well as a range of other publications issued by EirGrid and ESB Networks. In addition, the proposed substation and grid connection will facilitate the delivery of up to 119MW of renewable solar electricity from the Drumdowney Solar Farm onto the electricity transmission network. This will make a significant contribution to Ireland's climate objectives which aim to achieve a climate-neutral economy by 2050 and reduce greenhouse gas emissions by 51% by 2030.

TRANSPORT INFRASTRUCTURE IRELAND

The submission by Transport Infrastructure Ireland (TII), dated 29th January 2026, acknowledges the importance of and supports the delivery of proposals that assist with the transition to a low carbon and climate resilient economy, "increasing renewable energy generation and enhancing energy security". This is welcomed by the Applicant.

In relation to the proposed haul route, the submission refers to works to facilitating turbine delivery. There are no turbines associated with the proposed development. With the exception of the two abnormal loads, deliveries to the site will principally be by means of standard HGVs which can be easily accommodated on the national road network. Notwithstanding this, the Applicant is fully committed to facilitating the requests of TII which correspond with those already made as part of the application, including:

- A requirement to consult with PPP Companies, MMaRC Contractors and road authorities in respect of the construction haul route.
- Any proposed works to the national road network including signage shall comply with TII publications and shall be subject to a road safety audits. All necessary licences or agreements shall be secured from TII, PPP Concession, Motorway Maintenance, MMaRC Companies, local road authorities, as necessary.
- Any proposals or agreements referred to above will be shared with TII;
- Any damage caused to the pavement of the existing national road shall be rectified in accordance with TII Pavement Standards.
- 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.

We note the confirmation from TII that the grid connection option does not directly impact the national road network. The construction of underground cabling elements will have regard to the Department of Transport published Interim Guidance to Road Authorities (Version 2), effective from March 2026.

Overall, the Applicant welcomes the submission from TII and can confirm they will work with the national roads authority on all identified requirements as part of the positive delivery of the project.

DEPARTMENT OF HOUSING, LOCAL GOVERNMENT AND HERITAGE

The Department of Housing, Local Government and Heritage (DoHLGH) has made its observation on the proposed development in respect of archaeology. Specifically, it states that pre-development geophysical survey or advance archaeological testing should take this place to confirm any presence or otherwise of sub-surface archaeological features or deposits. It confirms "that this can be addressed by the inclusion of an appropriate condition if the development is permitted". This is consistent with recommendations set out in the submitted Archaeological, Architectural and Cultural Heritage Impact Assessment. Given that the majority of the underground cabling is in the public road, which constitutes previously disturbed land, it is requested that the applied condition confirm clearly that the advance survey works be focused on greenfield sections of the proposed development only.

03. Conclusions

We welcome the opportunity afforded by An Coimisiún Pleanála to comment on the observations on this application. None of the observers raise an opposition to the proposed development. Based on a review of the comments contained therein, we respectfully consider that the observations do not raise any substantive issues which would preclude a grant of planning permission for the proposed development. It has been robustly demonstrated that the proposed substation and grid connection is compatible with national, regional and local planning policy. It has been demonstrated that the proposed substation / grid connection will not give rise to any adverse visual effects in the local environment. Elsewhere, there will be no significant ecology, noise or archaeology impacts arising from the construction or operational phase of the substation / grid connection.

Kilkenny County Council have confirmed their acceptance of the proposed development at the subject location. They conclude definitively that the proposed development "is considered to be acceptable and would not adversely affect amenities of the local and wider local area, local traffic in area, or environment". Very positively, there are no third party objections on the file, which is reflective of the positive site selection process undertaken, as well as detailed design and assessment approach to the application.

We are in the midst of climate and energy crisis as reflected in the significant scaling up of renewable energy targets and implementation in recent years under REPowerEU and RED III. The challenge is substantial, and the response requires strong leadership and immediate intervention. Should Ireland fail to achieve its climate and renewable energy targets, we are directly contributing to the rise in temperatures predicated by IPCC and to the global threat that this rise will impose on future generations. This scenario is very likely, if not definitive, and Ireland is set to fail to achieve its 2030 targets, having already failed to achieve its 2020 targets.

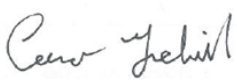
The delivery of renewable energy projects must be prioritised. The Board must consider its obligations under Regulation (EU) 2022/2577 and RED III to prioritise renewable energy projects and exercise its evaluative judgement and any discretionary powers in a manner consistent with the Climate Action Plan as required by Section 15 of the Climate Act. This is particularly relevant to Drumdowney solar farms and its associated substation and grid connection, where it has been demonstrated that the proposed development is located in an area where there is available grid capacity and the solar farm can output comparably higher electricity due to its siting in an area of high irradiance. The wider solar farm project can avoid the attrition rates which result in 40% of projects

not progressing beyond planning and into construction/operation phases of development. The benefits of this in terms of wider 'post -planning' development viability in the context of grid connections and route to market should not be underestimated. There is a shortage of available grid capacity in Ireland and renewable energy projects with viable grid connections need to be prioritized as per statutory obligations.

Based on the foregoing, we respectfully request that An Coimisiún Pleanála grant planning permission for the proposed substation and associated underground grid connection infrastructure.

Please do not hesitate to contact us if you have any queries.

Yours sincerely



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