

Strategic Infrastructure Department
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

31 March 2026

Re: Proposed Development of a Solar Farm, 110kV Substation, an Associated 110kV Grid Connection and all ancillary site works at lands at Drumroe East, Cappoquinn and adjacent townlands, Cappoquinn, Co. Waterford, Ref. No. ABP-321557-24.

Dear Sir/Madam,

On behalf of Amarenco Solar Ireland Ltd (Amarenco), I refer to the above S.182E pre-application process regarding the proposed development of a Solar PV Farm, 110kV Substation and associated 110kV Grid Route at Drumroe East, Cappoquinn and adjacent townlands, Cappoquinn, Co. Waterford, ABP reference 321557-24. Thank you for issuing a written record of the preapplication meeting held on 6th February 2025.

With respect to the discussion points in the written record I write to clarify the following:

- In order to optimise the capacity available via the proposed 110kV Substation and 110kV Grid Connection, Amarenco have revised the overall landholdings to include their permitted and as yet unbuilt solar farm at lands at Kilcannon, Waterford City & County Council planning ref no. 15/614 and modified by planning ref. no. 23/60433. The extant planning permission at Kilcannon is due to expire in June 2026 and Amarenco are taking this opportunity to expand the landholding at Kilcannon and to incorporate the landholding into the overall proposed scheme. The total land holding for the proposed Solar PV development now comprises approximately 150ha over three disparate land parcels. A revised layout plan accompanies this cover letter for your reference.
- The proposed development has now been re-organised into four separate planning application streams for the proposed development of a Renewable Energy Park over the three land parcels, consisting of the following:
 - A S.247 pre-planning consultation has been undertaken with Waterford City & County Council (WCCC) with respect to the PV and BESS elements of the proposed Solar development. The applications will be progressed in line with guidance provided at pre-planning with the local authority.
 - A S.34 planning application to WCCC for the proposed solar PV development is in preparation stage with an expected submission date in Q2 2026.
 - A separate S.34 planning application for Battery Storage (BESS) will be progressed with WCCC in the latter half of 2026.
 - A S.182A planning application for a 110kV substation and grid connection, which is the subject of this S.182E pre-application consultation, will be progressed with An

Coimisiún Pleanála under the provisions of the PDA 2000, pending receipt of an opinion confirming this approach is acceptable to An Coimisiún Pleanála.

- Due to the amalgamation of the Kilcannon site as part of the proposed development, the location of the substation has been revised to a location within the expanded Kilcannon site adjacent to the N72 National Primary Route. The effect of the revised location of the substation is the requirement of a shorter grid connection. The revised 110kV grid connection route will follow a similar route to the Dungarvan Substation as previously presented in our pre-application consultation meeting, with the following changes:
 - The 110kV substation development address will be within the townland of Kilcannon (Osbourne). It is proposed to lay an underground cable from the proposed 110kV substation at Kilcannon via the N72 National Secondary Route for a distance of approximately 6.2km passing through, or adjacent to the townlands of Kilcannon (Osbourne), Cappagh, Ballynamintra Upper, Coolnanav, Killeeshal, Ballylemon, Knockacullen, Ballylemon Lower, Ballymacmague North, Ballymacmague South to terminate at the existing 110kV Dungarven Substation at Killadangan, Dungarven, Co. Waterford.
 - It is anticipated that the grid connection will exit the substation at the Kilcannon site through its southern boundary directly onto the N72 national road. The cable is required to be covered by a hard surface for future access. It is proposed that the cable will run under the proposed internal track to the site boundary. It will pass under the hedgerow, which can remain intact as TLI and Eirgrid have agreed that a hard surface for this short span is not necessary. Potentially, the route will pass under an existing field gate. Additional hard surfacing will be provided between the hedgerow and the N72, however, this **will not be used as a vehicular access** to the site. If the existing gated field entrance is used, the gate will be removed and replaced with fixed fencing and supplementary native hedgerow planting.
 - The overall length of the proposed grid connection route will be approximately 8km, however, the length traversing the national road will be approximately 6.5km which is shorter than the previously permitted 38kV route (approximately 10km) that Amarenco had previously anticipated using. Detailed drawings of the proposed grid route layout accompany this cover letter.
- The applicant notes the comments relating to the requirements for a stage 2 Appropriate Assessment (AA) and NIS as a result of hydrological connections to two Natura sites under the previous application for a 38kV grid route. An AA screening is currently being undertaken. A future S.182A application will include a Stage 2 AA and NIS following any requirement outlined as part of the AA screening report.
- TLI have been engaged in the design of the 110kV Grid Connection from the Kilcannon site to the Dungarvan Substation. Further, a letter of engagement has been issued to TII in accordance with the requirements of the *"Interim Guidance to Road Authorities regarding the proposed placement of Medium or High Voltage electricity assets, including ducts, cables and associated infrastructure under public roads"* seeking to engage with TII in advance of submitting a formal planning application to the Commission.

On behalf of Amarenco, I would like to thank the Commission for its comprehensive feedback that the pre-application consultation meeting. We have no further questions regarding the procedure for an application for Electricity Transmission Development. Please find enclosed draft drawings prepared by TLI that provide further clarity on the revised location of the proposed 110kV substation and proposed 110kV grid connection. I recognise that there are a number of changes to the proposed development revising the proposals that were submitted as part of the S.182E request for pre-application consultation, however, we consider that the principle of the proposal remains the same and would therefore be subject to the same considerations and comments as previously received.

If the Coimisiún have any queries relating to the revisions to the proposal, we are happy to continue to engage under the provisions of S.182E pre-application consultation. However, if the Coimisiún are happy that the revisions to the proposed development do not warrant further considerations, we would welcome the closure of the pre-application phase.

We would appreciate if you could confirm receipt of this letter closing out the S.182E pre-application consultation at your earliest convenience.

Yours sincerely,



Matt Williamson
McCutcheon Halley

Enclosures

This cover letter to close out the S.182E pre-application consultation is accompanied by a soft copy of the following:

1. Revised site layout prepared by Amarenco Solar Ireland Ltd,
2. Overall Site Location Map prepared by TLI Consulting
3. Site Layout Plan Sheet 1 of 11 prepared by TLI Consulting
4. Site Layout Plan Sheet 2 of 11 prepared by TLI Consulting
5. Site Layout Plan Sheet 3 of 11 prepared by TLI Consulting
6. Site Layout Plan Sheet 4 of 11 prepared by TLI Consulting
7. Site Layout Plan Sheet 5 of 11 prepared by TLI Consulting
8. Site Layout Plan Sheet 6 of 11 prepared by TLI Consulting
9. Site Layout Plan Sheet 7 of 11 prepared by TLI Consulting
10. Site Layout Plan Sheet 8 of 11 prepared by TLI Consulting
11. Site Layout Plan Sheet 9 of 11 prepared by TLI Consulting
12. Site Layout Plan Sheet 10 of 11 prepared by TLI Consulting
13. Site Layout Plan Sheet 11 of 11 prepared by TLI Consulting