



FSS Seirbhis Náisiúnta Sláinte
Comhshaoil
Ospidéal Naomh Dymphna, Bóthar Bhaile
Átha Í, Ceathartach, R93 DE62

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

www.hse.ie
T: 059 913 6574
E: CarlowKilkenny.PEHO@hse.ie

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

Date: 25th February 2026
Name: An Coimisiún Pleanála
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 Seirbhis Náisiúnta Sláinte
Comhshaoil
Ospidéal Naomh Dymphna, Bóthar Bhaile
Átha Í, Ceatharlach, R93 DE62

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

www.hse.ie
T: 059 913 6574
E: CarlowKilkenny.PEHO@hse.ie

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 fossil 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

Robbie Doyle

A handwritten signature in blue ink that reads "Niall Roche".

A handwritten signature in blue ink that reads "Robbie Doyle".

Network Support Unit Member

Principal Environmental Health Officer