

The Secretary
An Coimisiún Pleanála
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Dublin 1
D01 V902

by e.mail; sids@pleanala.ie

Dáta | Date
29 January 2026

Ár dTag | Our Ref.
TII26-134698

Bhur dTag | Your Ref.

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.



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

**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 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



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 Structure 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 notes 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.



Bonreagar 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.*

Próiseálann BÍÉ sonraí pearsanta a shléáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag www.tii.ie.
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