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The Secretary
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11th August 2026

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Accreditations
ISO 9001:2015
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**Re: An Coimisiún Pleanála Reference No: PL-500085-LD (Longford County Council Reference 24/60325). A 10 Year Planning Permission for a solar farm and energy storage compound. A Natura Impact Statement (NIS) was submitted with this application. At Cornacarta Doonacurry Foygh Kilcommock Glebe Ledwithstown and Tirlickeen (townlands) , Keenagh and Ballymahon , County Longford.**

Dear Sir/Madam,

We act on behalf of Foigha Solar Farm Limited, who wish to respond to the An Coimisiún Pleanála issued Request for Further Information dated 27th February 2026. The request related to 2 no. items, namely:

1. Consideration of firewater requirements and associated management for the energy storage component of the project, reflecting the relatively new nature of such technology in Ireland.

2. The need for additional archaeological investigations.

The Commission's request has been given full consideration. Specialist UK consultants on Energy Storage Systems, Cairn Risk, were appointed to address the queries in relation to firewater and risk management. A programme of archaeological test trenching has been undertaken to supplement the previous geophysical survey on site. The latter has taken some time owing to formal licencing, resource and reporting requirements.

## 01. Design Updates

The completed work packages referenced above have resulted in some small design changes to the layout of the proposed development, as follows:

- Provision of archaeological buffers to 10 no. areas providing for a reduction in panelled area of the proposed solar farm of c.404 sqm. Minor localised relocation of tracks / supporting infrastructure in some cases.
- Alterations to the Energy Storage compound layout for firewater provision and management comprising, localized reorganization of plant[1], addition of water storage tank

[1] Revised compound layout includes 32 no. energy storage modules, 8 no. transformers, 2 no. auxiliary transformers, 1 no. medium voltage control / switching substation, 2 no. spare parts containers, and 1 no. office container.

and hydrants, compound drainage network, including water attenuation pond, and rainwater discharge soakaway.

These design changes are detailed on the enclosed revised Site Layout Plans by Macro Works. There are no alterations to the proposed landscaping plans for the project. The proposed solar farm will have a maximum export capacity (MEC) of 85MW.

## 02. Request Responses

**Energy Storage System**

a. *The submitted Fire Safety Statement is noted however further detail is required in the form of a Fire Risk Management Plan (FRMP). The FRMP should be prepared by a suitably qualified technical expert / advisor and set out preventative measures for potential causes of fire hazard and evaluate the associated risk of same. It should also include specific measures to reduce the risk of a fire occurring onsite including, for example, the safe storage and maintenance of flammable substances and materials, the intended method(s) of extinguishment, and the installation of fire safety equipment and apparatus (fire alarms, detection systems, methods of suppression, etc.). The FRMP should explicitly demonstrate how the potential risk of a fire occurring on the site would be addressed and minimized.*

This response is accompanied by a Battery Safety Management Plan by Cairn Risk Consulting. The document outlines how the Foigha Energy Storage System will be located, designed and operated to manage the safety and environmental hazards associated with the facility. It provides the basis for demonstrating that the hazards introduced by the energy storage system and its surrounding environment are understood, and that appropriate measures are being taken to prevent and mitigate those hazards. It is prepared in full accordance with The UK National Fire Chiefs Council (NFCC) publication Grid scale energy storage system planning - Guidance for fire and rescue services and NFPA 855, Standard for the Installation of Stationary Energy Storage Systems (2026). The Foigha Energy Storage System has been assessed against key standards and best practice guidance to confirm that it can safely exist at the proposed location and current design configuration. The assessment of safety considerations includes fire safety requirements, including the adaption of prevention and mitigation measures. With the specified measures in place, all limited residual risks will be managed to a fully acceptable level.

b. *Further detail is required in the form of an Emergency Response Plan (ERP). The ERP should be prepared by a suitably qualified technical expert / advisor. It should outline a reactive strategy with clear procedures to follow in the event of a fire, detailing the specific actions the facility operator must take to respond quickly and effectively in the event of fire or similar emergency.*

As requested an Emergency Response Plan has been prepared by Cairn Risk Consulting, who have significant experience of preparing similar reports for such projects. The document provides clear emergency response arrangements in relation to potential incidents occurring at the facility. It responds to key potential identified hazards, including fire risk, setting out the adopted firefighting strategy, supporting firewater provisions, remediation and emergency response measures. Further

to any grant of permission, a final Emergency Response Plan will be developed in close partnership with key stakeholders, and having regard to all committed measures set out in the subject report.

c. *Firefighting Water I Fire Water Storage*

(i) *Details of the quantity and confirmation of how firefighting water will be sourced and/or retained within the proposed development site. This should be to the UK National Fire Chiefs Council (NFCC) Grid Scale Battery Energy Storage System Planning - Guidance for the FRS (Fire & Rescue Services), which states that provision should be made for BESS units to provide 1,900 litres of water for 2 hours, as a minimum unless it can be demonstrated that another amount is appropriate. Revised drawings and necessary agreements be provided to demonstrate feasibility of same.*

(ii) *You shall submit a detailed methodology for fire water storage management along with any proposed mitigation measures (e.g. Drainage systems, interceptors, bunded lagoons, etc). Such measures shall be included in the ERP, as referred to in Item 2 above.*

(iii) *Drainage proposals designed to manage rainfall runoff and fire water runoff, with associated calculations to be informed by the anticipated fire water requirements from the proposed development. Having regard to the location of the battery energy storage system proximate to the Kiltaffrey Stream to the east, and associated flood risk identified in the submitted site-specific flood risk assessment, and in this context, having regard to the need for large quantities of water in the event of a fire/ thermal runaway event, drainage proposals shall include details to demonstrate that suitable catchment, containment and on-site treatment measures would be in place for firewater runoff and other potential firefighting substances (such as foam) and also details of any mitigation necessary to ensure that there will be no contamination of surface or groundwater, and that consideration has been given to potential downstream impacts.*

As set out, the design of the energy storage compound has been updated having regard to specialist consultant input on firefighting water and firewater storage requirements for the operational facility. Provision has been made for a water storage tank and hydrants for firefighting water and a site drainage system to manage any potential firewater event. The sizing of associated infrastructure has been informed by NFCC guideline requirements. Provision is made for a water storage tank with a volume of 200m$^3$ which exceeds the minimum 180m$^3$ volume in the NFCC guidance. Similarly, at 350m$^3$, the water attenuation pond greatly exceeds the NFCC volume requirement. The sizing accounts for the volume of firewater expected to be deployed during an incident and rainfall run-off entering the drainage system.

The proposed design makes appropriate provision for fire water storage as per NFCC guidelines. A static water storage tank will be provided on site with a volume capacity of 200m$^3$. The design allows for a minimum firewater provision of 200,000 L, which exceeds the minimum requirement of 180,000 L based on 25 L/s for 120 minutes. The water tank includes dedicated access by a

tanker and will be filled manually ahead of the operational phase and maintained in situ. There is no requirement for a formal connection to the public water mains. Firewater hydrants are located towards the eastern and western ends of the compound, allowing responders to access water from a safe position.

The operational strategy for firewater management will include:

- Installation of fire water storage tank at usage storage capacity agreed with Fire Authority (final specification and particulars to be agreed in writing).
- Storage tanks to be fitted with continuous level indicators and low-level alarm (to mitigate against leak scenario).
- Provision of dedicated hard standing access to water storage tank (as designed).
- Adequate signage will be provided to indicate the location of the tank(s). The signage will be located and sized to ensure they are clearly visible from the access route. Signage should indicate "FIRE FIGHTING WATER SUPPLY" and the capacity of the tanks.
- Tank monitoring to be integrated part of operational procedures, to include remote telemetry and onsite inspections, access and flow checks, as well as refill verification.
- Firefighting water and hydrant requirements will be subject to reporting to and inspection by Fire Authority, as required.

The firewater provisions are documented in the submitted Emergency Response Plan.

In relation to item (iii), the drainage design proposals in the compound have been developed with direct input from the appointed fire risk consultants and having regard to the guidelines requirements. The design includes a firewater run-off drainage network and associated water attenuation pond. The volume for water attenuation is directly informed by the NFCC guidelines, which functional attenuation design capacity directly responds to. The design includes a rainwater discharge soakaway south of the energy storage compound. During normal operations, any rainwater from the Energy Storage compound will drain to the attenuation pond and subsequently discharge by gravity to the rainwater discharge soakaway. The soakaway has been sized to meet runoff rates from the full hard standing area of the energy storage compound and attenuation pond, includes 2x 225mm perforated underdrain pipes, and assumes stone voids of 40%. Per best practice, infiltration rates will be confirmed on site via BRE 365 testing. In any unforeseen fire water management scenario, automated shut-off valves will be activated meaning no discharge of collected fire water to the soakaway.

The request references the nearby Kiltaffrey Stream to the east. The energy storage compound and all of the above referenced infrastructure is set back away from this stream, with no elements in any area of flood risk. As per the submitted technical plans, a 1m high bund will surround the perimeter of the attenuation pond[2]. The proposals, including sizing of firefighting water storage and fire water management infrastructure, complies with NFCC guidelines, and will ensure there is no contamination of surface or groundwater in an unforeseen or expected firewater

[2] The design capacity of the attenuation pond excludes the build up area within these bunds.

management event. The final design of management measures will be agreed with the Fire Authority ahead of construction. All limited residual risks will be managed to a fully acceptable level.

d. *Having regard to the plans and particulars prepared in respect of Item 1 (a) to (c) above you are required to submit a revised Appropriate Assessment Screening report and Natura Impact Assessment, which assess the potential adverse effects arising from the proposed development on European Sites located within the Zone of Influence.*

The proposed design changes have been reviewed in full by the project ecologists, Greenleaf Ecology, with an revised Appropriate Assessment Screening report and Natura Impact Assessment submitted. The ultimate findings of these reports remain unchanged from that previously submitted. The reporting objectively concludes that the proposed development will not adversely affect the integrity of a Natura 2000 sites, and there is no reasonable scientific doubt in relation to this conclusion.

e. *All other documentation submitted with the application should be reviewed and updated, where required, to address any amendments to the proposal which might arise in response to this request.*

The response to the submission includes an updated Environmental Impact Assessment (EIA) Screening, in support of An Coimisiún Pleanála's role as the competent authority in respect of EIA screening. The updated report confirms the previous screening findings, namely, that the preparation of an Environmental Impact Assessment Report is not required.

A review of other application reporting has been completed having regard to the design changes arising from the Commission's requests. As outlined, the revised design provides for the removal of a number of solar panel tables for the purposes of buffering identified archaeological features. As such, the assessed scheme in respect of glint of glare represents a worse case assessment scenario in respect of potential for impact. There are no changed circumstances in respect of noise impact assessment, ecological impact assessment, flood risk, or EMF/ EMC. The amount of noise emitting plant has been reduced as part of the redesign of the energy storage compound[3], again, meaning the assessed impacts are greatly than now proposed.

The main change in the energy storage compound is the provision of fire water storage tank, drainage network and attenuation / soakaway. The fire water storage tank is the only material above ground structure. This tank is 4.42 metres in height, but will be located in the vicinity of the office container and energy storage units. A functional part of the compound, the water tank will be thematically and visually linked to the rest of the infrastructure in the facility. The energy storage compound is set back from the public road and benefits from perimeter roadside landscape planting as per the submitted Landscape Mitigation Plans. There is no potential for significant visual impacts arising from the proposed development.

Similarly, there are no impacts on the site access report. The site will continue to be accessed by the design entrances. The construction programme will not change. The reduction in panelled area

[3] The number of energy storage modules has been reduced from 38 to 32, with the no. of transformers reduced from 10 to 8.

and plant will largely offset additional work needed for the creation of the attenuation tank and drainage soakaway. The identified construction HGV traffic numbers for the project included 10% contingency, meaning there will not be any significant change in associated trips to site. A final contractor prepared Construction Environment Management Plan, including Traffic Management Plan, will be prepared and agreed with Longford County Council.

f. *Having regard to the need for large quantities of water in the event of a fire, you should liaise with Longford County Council and Uisce Eireann in relation to any proposed connection to the public water supply. The capacity of the public water supply to service the proposed development in line with FI request no.1 (c) above should be ascertained, and any resultant adverse impacts on public water supplies for nearby settlements should be assessed.*

As outlined above, there is no requirement for direct access to the public water supply to support the proposed development. As such, there is no requirement for connection to the public water network. Notwithstanding this, Cairn Risk have made some efforts to speak to the Fire Officer in Longford County Council. At the time of writing, a response has not been obtained in respect of the proposals[4]. Further to any grant of permission, the Applicant remains committed to agreeing all aspects of the energy storage detailed design with the County Fire Officer.

**Archaeology**

*The documentation submitted to the planning authority, including results of geo-physical surveys submitted at further information stage, is noted. Whilst c. 78.Sha of the site was subject to a geophysical survey, by association, c. 51.2ha of site was not subject to a geo-physical survey including significant tracts of land located north of the canal and in the wider vicinity of the former church and graveyard. Having regard to the submissions received by the planning authority from the Department of Housing, Local Government and Heritage, dated 22nd January 2025 and 8th September 2025, you are required to carry out archaeological investigations as follows:*

a. *You are required to engage the services of a suitably qualified archaeologist to carry out fieldwork-based archaeological impact assessment of the proposed development. No sub-surface work should be undertaken in the absence of the archaeologist without his/her express consent.*

b. *The assessment shall involve documentary and cartographic research, an examination of the proposed plans for development, a review of the completed geophysical surveys (Licence Numbers 25R0149, 25R0184 and 25R0185) and archaeological testing (licensed under the National Monuments Acts 1930- 2004). Test trenches shall be excavated at locations specified by the archaeologist within the proposed development area, having consulted the site plans, results of geophysical survey, including those conducted under Licence Numbers 25R0149, 25R0184 and 25R0185, and fieldwork, to determine the presence/absence of archaeological remains.*

[4] Refer to enclosed emails to the Fire Officer.

c. *A written report on the above, including an archaeological impact statement shall be submitted.*

The services of John Cronin & Associates has been retained to address this request item. The request references that 51.ha of the site was not subject to initial geophysical survey. As set out in the submitted Archaeological Impact Assessment, the geophysical survey covered over 67% of the site area where development is proposed. It was not possible to complete the remaining area owing to due to the terrain and the requirements of the machinery. A strong commitment was made to completing further investigations pursuant to any grant of permission, and consistent with established precedent elsewhere. Having regard to this, and the relatively benign findings of archaeological potential in the geophysical survey, Longford County Council satisfied themselves that permission could be granted for the proposed development.

On foot of the subject request from the Commission, a programme of test trenching was carried out across the proposed development site in June 2026. A total of 129 test trenches with a combined length of 7,047 meters were excavated, which targeted identified geophysical anomalies and proposed hard standing areas / discretionary additional testing areas. Across the test trenches excavated, areas of archaeological material, or probable archaeological material, were identified in 10 instances. Spreads of pyrolithic material, of the type found in association with Fulachtai Fia, were identified in three trenches. Possible kilns were identified in three trenches. Two possible hearths and two possible pits were also identified. Six of these features were found based on anomalies identified from the geophysical survey. A further four were identified in areas where the geophysical survey was not undertaken. Trenches in unsurveyed areas consisted of the majority of the areas investigated. The areas in which the geophysical survey was not carried out were demonstrably more marginal than those where the survey was carried out.

The design of the solar farm has been revisited having regard to the additional archaeological investigations undertaken. Development buffers have been introduced around the 10 no. archaeological features. A clear strategy of mitigation by avoidance has been taken. The additional recommendations set out in the AIA will be adhered to, ensuring there is no potential for residual impact on archaeological heritage arising from the proposed development.

In conclusion, the proposed development as modified as a result of the programme of geophysical survey and an extensive programme of archaeological testing, will not rise to any significant archaeological impacts. We respectfully submit that there is no archaeological reason why the proposed development should not be granted planning permission by An Coimisiún Pleanála. The approach taken to the completion of archaeological investigations under the subject Further Information request is significant, at over 7km of test trenching, which principally validates the preceding geophysical survey completed. There is certainty that the proposed development can proceed without any potential for significant impacts on archaeological heritage, and we respectfully note that the Commission has granted planning permission for other solar farms nationally, where an equivalent level of archaeological investigations has not been undertaken[5]. It has been consistently recognised that the flexible nature of solar farm design

[5] Sample application references ACP-317994-23, ACP-322347-25, and ACP-323747-25.

means it can be tailored to avoid impacts on any areas of previously unidentified archaeological potential.

## 03. Conclusion

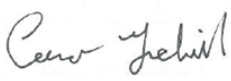
European and national policy is unequivocal that we are in the midst of climate and energy crises as reflected in the significant scaling up of renewable energy targets in recent years under REPowerEU. The Government's Climate Action Plan 2025 provides a detailed plan for taking decisive action to achieve a 51% reduction in overall greenhouse gas emissions by 2030 and to reach net-zero emissions by no later than 2050. The proposals include sectoral limits aimed at reducing carbon emissions which includes greater demand for cuts on offending electricity production. This includes an intention to increase the proportion of renewable electricity to up to 80% by 2030, and a significant target of 8GW from solar by 2030. Based on recent projections made by the Environmental Protection Agency, the 2030 targets will not be achieved. This is an alarming concern given the criticality of the climate emergency.

The Commission for Regulation of Utilities (CRU) Enduring Connection Policy sets the terms and conditions of electricity generators' access to the electricity system. The policy "has considered evolving European and national energy policy including the prioritisation and timelines in the Government's Climate Action Plan" and "prioritises, in the first instance, large renewable energy projects". The proposed Foigha Solar Farm is one such project and there is clear locational, technical and planning justification to support the proposed development. The subject planning application for Foigha Solar Farm was submitted in December 2024. From a commercial perspective, two lengthy Requests for Further information have delayed the ability to deliver the project, with archaeological investigations having the biggest impact on project programme. This statement is not made to undermine the importance of archaeological heritage, which the Applicant is fully committed to protecting, rather it is made to highlight the delays that can occur in delivering projects deemed critical to addressing the climate and energy crises. As noted, and from the Applicant's perspective, all archaeological matters have been investigated to a level where planning consent can be conferred.

Having regard to the length of the planning process to date, and the positive resolution of all planning matters raised, we respectfully request a prompt determination of this appeal. Ireland urgently needs strategic renewable energy projects such as the Foigha Solar Farm that can efficiently connect to existing transmission grid infrastructure, are economical to develop and construct and can generate renewable electricity to serve national demand and achieve increased security in domestic energy supply.  Planning permission is important for the advancement of the project to the Renewable Electricity Support Scheme (RESS) and the achievement of a grid connection to allow for delivery. A grid connection offer is imminent for the subject project and a decision is necessary by the 30th of September 2026 to process same. A timely decision is therefore critical and respectfully requested in the subject case.

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

Yours Sincerely



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Enclosures

- Revised Site Layout Plans by Macro Works.
    - FGHA-SLR-RFI-LD.FGHA-SLR 1.2
    - FGHA-SLR-RFI-LD.FGHA-SLR 1.4
    - FGHA-SLR-RFI-LD.FGHA-SLR 1.5
    - FGHA-SLR-RFI-LD.FGHA-SLR 1.6
    - FGHA-SLR-RFI-LD.FGHA-SLR 1.11
    - FGHA-SLR-RFI-LD.FGHA-SLR 1.15
    - FGHA-SLR-RFI-LD.FGHA-SLR 1.16
    - FGHA-SLR-RFI-LD.FGHA-SLR 1.17
- Revised Standard technical plans for water tank, attenuation and rainwater discharge infrastructure.
    - FGA-TD-010 – Energy Storage Container
    - FGA-TD-011 - Aux & PCS Transformer detail
    - FGA-TD-013 - Water Storage Tank
    - FGA-TD-014 - Water attenuation Pond & Soakaway Area
    - FGA-TD-015 - 20ft Office Container

- Revised Archaeological Impact Assessment by John Cronin & Associates.
- Battery Safety Management Plan and Emergency Response Plan by Cairn Risk Consulting, including email correspondence to Longford Fire Officer.
- Revised Appropriate Assessment and Natura Impact Statement by Greenleaf Ecology.
- Updated Environmental Impact Assessment Screening by HW Planning.
- 1 no. USB of the response.