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CARLOW COUNTY COUNCIL

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W: carlow.ie

8th September 2025

**Lauren Murphy,
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902.**

**RE: Proposed 110kV electrical substation and grid connection located within the townlands of Friarstown, Grangeford Old, Grangeford, Moanalow, Glenoge, Rathnashannagh, Inchisland or Moatalusha, Rathtoe, Kellistown East, Ballycurragh and Kellistown West, Co. Carlow.
PRT Solar Limited.**

Dear Sir/Madam,

I refer to your letter dated 18th August 2025 in connection with the above S182A (1) application.

Please find enclosed the Planners Report in relation to same as requested. If you have any further queries please contact the Planning Department on 059 91 70346 or planningdevman@carlowcoco.ie.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Brian O'Donovan', written over a horizontal line.

**Brian O'Donovan,
Senior Executive Officer.**

CARLOW COUNTY COUNCIL
PLANNING DEPARTMENT

Planning Report 1

C A R L O W
C O U N T Y C O U N C I L

COMMUNICATIONS & CREATIVE MEDIA



ABP Reg. Ref.	ABP-322690-25
Name of Applicant	Prt Solar Limited
Address of Development	In the townlands of Friarstown, Grangeford, Old, Grangeford, Moanalow, Glenoge, Rathnashannagh, Inchisland Or Moatalusha, Rathtoe, Kellistown East, Ballycurragh, and Kellistown West. Co. Carlow.
Type of Development	The proposed Development will consist of a 10 year permission for a 110kV electrical substation and associated 110kV underground grid connection, cabling and associated works required to connect a solar farm (permitted under Carlow County Council Reg. Ref: 23/60297; which amended previous permission Reg. Ref: 21/23 and ABP-309987-21) to the existing Kellistown 220kV substation. The proposed 110kV electrical substation in Friarstown, on a site of ca.1.7ha will consist of: a) 1 no. electrical substation compound and access road, palisade fencing and gates, measuring 100.75m x 126.75m; b) 1 no. electrical substation / IPP control building measuring 10.74m x 20.15m and 6.920m in height; c) 1 no. Eirgrid switch room building measuring 18m x 25m and 8.55m in height; d) 6 no. lightning protection monopoles measuring up to 18m in height; e) Associated electrical apparatus, plant and equipment; overhead and underground electrical and communications cabling and ancillary works; f) Upgrading of existing access road; g) Temporary site construction compound; and h) All associated ancillary works above and below ground including landscaping. The 110kV underground cabling is proposed from the substation in Friarstown townland to Kellistown 220kV sub-station in Kellistown East townland through the townlands of Friarstown, Grangeford Old, Grangeford, Moanalow, Glenoge, Rathnashannagh, Inchisland Or Moatalusha, Rathtoe, Kellistown East, Ballycurragh, and Kellistown West will consist of: a) Ca. 8km of underground 110kV electrical cables and associated communications cables; b) 11 no. underground joint bays; c) 3 No HDD Crossing; d) Associated works including road carriageway passing places; and, e) All associated ancillary works above and

below ground. A Natura Impact Statement (Stage 2 Appropriate Assessment) has been prepared in respect of this application.

Type of Permission

Permission

Date of Site Inspection

25/07/2025

Context

The following observations and commentary are made in respect of a Section 182A application to An Coimisiún Pleanála for Strategic Infrastructure Development ('SID') consent for a proposed 110kV electrical substation including all associated development works to accommodate its construction and 110kV underground grid connection on a site of ca. 1.7 hectares at Friarstown, Co. Carlow.

In summary the proposed 110kV electrical substation in Friarstown, will consist of:

- a) 1 no. electrical substation compound and access road, palisade fencing and gates, measuring 100.75m x 126.75m;
- b) 1 no. electrical substation / IPP control building measuring 10.74m x 20.15m and 6.920m in height; c) 1 no. Eirgrid switch room building measuring 18m x 25m and 8.55m in height;
- d) 6 no. lightning protection monopoles measuring up to 18m in height; e) Associated electrical apparatus, plant and equipment; overhead and underground electrical and communications cabling and ancillary works;
- f) Upgrading of existing access road; g) Temporary site construction compound; and
- h) All associated ancillary works above and below ground including landscaping.

The 110kV underground cabling ('UGC') is proposed from the substation in Friarstown townland to Kellistown 220kV substation in Kellistown East townland through the townlands of Friarstown, Grangeford Old, Grangeford, Moanalow, Glenoge, Rathnashannagh, Inchisland Or Moatalusha, Rathtoe, Kellistown East, Ballycurragh and Kellistown West. The UGC will be ca. 8km in length, primarily along public roads with a small area in private lands.

The Proposed Development is indicated to be critical infrastructure that will be intrinsically linked to both permitted and planned renewable energy projects, comprising both solar and battery energy storage developments. These renewable energy projects can not function as standalone developments as they are reliant on connections to the Proposed Development in order to connect to the national grid.

The applicant also states that is anticipated that, subject to a grant of permission, the proposed 110kV substation will be developed in lieu of the previously permitted 38kV substation as permitted by Carlow County Council under Planning Ref: 2360297, which amended previous permission Reg. Ref: 21/23 and ABP-309987-21. The Proposed Development will connect the renewable energy project to the existing Kellistown 220kV substation. It is envisioned that the Proposed Development will be constructed in conjunction with the Permitted Solar and BESS Development.

Planning Authority view in relation to the decision to be made by the Board

- Having regard to the development as permitted by Carlow County Council under Planning Ref: 23/60297 which made provision for a 38kV substation in addition to the construction of the Solar PV development, the Planning Authority considers this current proposed development amounts to supporting infrastructure for the consented Solar PV development by way of an amended substation and accordingly in principle have no objection to the proposed development to allow for a connection of the renewable energy project to the national transmission grid.

- The Planning Authority would have concerns that the development be appropriately co-ordinated with adjoining permitted development so as to minimise any negative impacts to residential amenities in the area particularly where different requirements have been stipulated in the permitted developments to the current proposal.
- Given the scale of the permitted development and other similar type developments permitted in the wider area, the cumulative impact of the proposed works and adjoining permitted development on the local road network should be considered. The application should demonstrate that the proposal will not affect or alter any local drainage systems or rivers or adjacent properties and that the underground cables will not affect the drainage of the locally classed public roads.

Site Location

- The subject site is located between Carlow Town and Tullow with access proposed off the Regional Road R725, the main route linking these towns. The nearest settlement to the proposed site is Rathoe Village circa 3.7km to the south, with Tullow being circa 4km to the southeast.
- The route of the M9 Motorway is circa 2.1km to the west of the site. The site is rural in character consisting of existing agricultural land (mainly arable crop), with clusters of one-off rural dwelling development situated fronting onto the R725 and L6113. The topography of the area is relatively flat to low rolling landscape.
- The site is located within the Central Lowlands Landscape Character Area as designated in the Carlow County Development Plan 2022-2028. Within this character area, the site lies within the 'farmed lowlands' landscape character type which has a class 3 moderate sensitivity designation. This LCA has the capacity to absorb most types of development subject to the implementation of appropriate mitigation measures. There are 9 no. scenic views and 1 no. scenic route in the County Development Plan within a 5km distance of the site.
- There are 3 no. designated sites located within the catchment area of the application site, comprising the River Barrow and River Nore SAC (8km), the River Slaney SAC (2km), the Holdenstown Bog SAC (12km) and the Blackstairs Mountain SAC (14km). The nearest waterbody is the Ardnahue River which is located within the northern portion of the site and is a tributary of the Burren River and is therefore hydrologically connected to the River Barrow and River Nore SAC i.e. Burren River is a tributary of the River Barrow.
- *The application site incorporates the location of a number of Recorded Monuments including CW002672 (Burial Ground) and is within the zone of influence of a number of Recorded Monuments. An Archaeological Impact Assessment (AIA) shall be carried out by a suitably qualified Archaeologist and should include an Archaeological Geophysical Survey and Archaeological Test Excavation.*



3) Internal Reports

This application was referred on 7/7/2025 to the following, reports received are attached with this submission and are as indicated below.

- Municipal District Engineer

Report received on 14/07/2025 from P. Harrington, (Tullow Area Engineer) which outlines a number of observations / queries but raises no objection to the proposed development subject to condition.

- Transportation Department

Roads - No report received at the time of writing.

- Environment Section

Report received on 24/07/2025 from D. Lynch (Senior Executive Engineer), which raises no objection to the proposed development subject to condition.

Relevant Development Plan provisions relating to the subject site and surrounding area

Carlow County Development Plan 2022 – 2028 (CDP)	
Chapter 4	Enterprise and Employment
Chapter 6	Infrastructure and Environmental Management
Chapter 9	Landscape and Green Infrastructure.
Chapter 10	Natural and Built Heritage, including (inter alia) European and National Designated Natural Heritage Sites, Archaeological Heritage, and The Record of Protected Structures.
Chapter 16	Development Management Standards.

Chapter 4 – Enterprise and Employment

Section 4.4.4 Placemaking and Sustainable Design

PM. P4: It is the policy of the Council to;

'Support the development of industries that create and employ green technologies and encourage the uptake of measures to facilitate the transition towards a low carbon economy and circular economy.'

Chapter 7 – Climate Action and Energy

Section 7.10.3.2 Solar Energy

'No commercial scale solar projects are in operation within County Carlow. However, there are a number of solar developments permitted with a total export capacity of c. 29.49 MW.'

There are currently no national guidelines in place to guide the location or scale of solar farms. Constraints may arise in relation to landscape impacts, protection of natural heritage or archaeology, or in relation to protecting the high value agricultural land suitable for tillage.

The County RES maps the potential availability of solar resources. The mapping exercise was carried out applying a risk-based approach to suitability for solar farms. The risk level is defined by adding up the risk levels at certain distances from material assets, sensitive receptors, European Sites and from natural physical attributes (such as groundwater vulnerability, geological heritage sites, soil drainage, landslide, and flooding susceptibility). The summed risk levels are displayed on a scale ranging from High (maximum risk) to Low (minimum risk). However, the presence of a risk category in and of itself does not support nor preclude solar development; it is a tool which flags areas of having a higher or lower concentration/distance from various sensitive receptors.

A proposed solar development would be subject to detailed siting and environmental considerations, and the outcomes of the planning process. The risk mapping suggests that the northern part of the County has a higher potential for solar farms.'

Climate Action – Policies

CAP2:

Support the transition of the County to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050, by way of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency.

Renewable Energy – Policies

RE. P1:

Encourage and facilitate the production of energy from renewable sources, such as from wind, solar, bioenergy, hydroelectricity, and geothermal, subject to compliance with proper planning and environmental considerations.

Solar Energy Policy**SE. P2:**

Favourably consider the development of solar farms on agricultural lands which allow for farm diversification and multipurpose land use.

Solar Energy Objectives**SE. O1:**

Increase the penetration of solar energy developments at appropriate locations subject to compliance with proper planning and environmental considerations.

SE. O2:

Promote the integration of solar energy into existing and planned developments.

Volume 2b Appendix VI of the Carlow County Development Plan 2022-2028 contains the Carlow County Renewable Energy Strategy.

Section 6.2 of the strategy outlines policy in relation to Solar Energy developments. Table 6-9 outlines the objectives and supporting policies in relation to solar energy over the short (1-2 years) an, medium 2-6 years) and long term (6-10 years).

Table 6-9: Solar Energy Objectives and Polices				
Name	Description	Short-term	Medium-term	Long-term
Objective S1	Increase the penetration of commercial scale solar energy development in appropriate locations.	✓	✓	✓
Policy S1.1	To favourably consider the redevelopment of brown field sites for large solar PV projects.	✓	✓	✓
Policy S1.2	To favourably consider the development of solar farms on agricultural lands which allow for farm diversification and multipurpose land use.		✓	✓
Objective S2	To promote the integration of solar energy into existing and planned developments.	✓	✓	✓
Policy S2.1	To encourage the use of solar thermal or solar PV installations as part of the design and planning process for new developments and refurbishments.	✓	✓	✓
Policy S2.2	To promote and facilitate the use of solar technology across County Carlow including schools, public offices and for infrastructure, e.g. traffic lights, streetlights, road information signage etc.	✓	✓	✓

Volume 2b Appendix VII of the Carlow County Development Plan 2022-2028 contains the Carlow County Landscape Character Assessment & Schedule of Protected Views

The site is located inside the 'Central Lowlands' landscape character area. This area is deemed moderately sensitive to development. It has the capacity to absorb most types of development subject to the implementation of appropriate mitigation measures. The application site is located within the farmed lowland landscape type and has a landscape sensitivity of 2-3.

Additionally, the site is not located within scope of any scenic views or routes.

LCA Policy Objective (Central Lowlands): Conservation, restoration and enhancement of the existing landscape character area. New development to maintain integrity of landscape character area through careful location, siting and design.

Chapter 9 of the Carlow County Development Plan 2022-2028 relates to Landscape and Green Infrastructure. The following policies are noted:

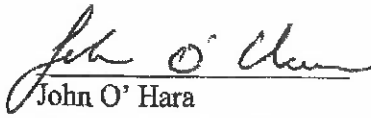
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|---------------|---|
| LA P1: | Protect and maintain the overall integrity of the County's landscape, by recognising its capacity to sustainably integrate and absorb appropriate development, and by ensuring that development protects, retains and, where necessary, enhances the appearance and character of the landscape, and does not unduly damage or detract from those features which contribute to its value, character, distinctiveness and sensitivity e.g. landform, habitats, scenic quality, settlement pattern, historic heritage, amenity, land use and tranquillity. |
| LA P2: | Ensure that development will not have a disproportionate landscape or visual impact in sensitive upland areas of the County (due to siting, layout, design or excessive scale, height and bulk) and will not significantly interfere with or detract from scenic upland vistas, when viewed from the surrounding environment, including nearby areas, scenic views and routes, and from settlements. |
| LA P6: | Require all developments, having regard to their landscape setting, to be appropriate in siting, layout, design and scale, in order to ensure any potential adverse or landscape and visual impacts are minimised and/or removed where necessary, and that natural site features and characteristics are retained and maintained. |
| LA P8: | Require, where appropriate, Landscape/Visual Impact Assessments to be prepared by suitably qualified professionals, for development proposals which may have significant landscape or visual impacts, and/or which are located within or adjacent to sensitive landscapes. |

Conditions which may be appropriate

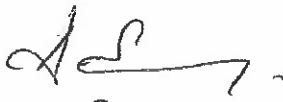
The Planning Authority considers that should An Bord Pleanála be mindful to grant planning permission for this Strategic Infrastructure Development that suitable conditions should be attached to any grant of permission that require;

- Additional landscaping measures (semi mature planting) to be implemented around the perimeter of the Substation Compound in order to soften & absorb the overall visual impact of the proposed development on this area.
- The appointment of a traffic management coordinator to liaise with similar adjoining developments and to co-ordinate construction timelines and road openings to prevent prolonged and negative impacts to road users.
- Pre and post road surveys and reinstatement costs to maintain the structural integrity of the public road network in respect of the underground grid connection installation works. Any resulting damage must be repaired to the council's satisfaction and all costs borne by the applicant.

- Provide details for protection measures for existing water service infrastructure in the area during the grid connection works.
- A detailed Construction Environmental Management Plan and a detailed Surface Water Management Plan.
- All mitigation measures outlined in the submitted Natura Impact Statement to be carried out in full and implemented by the developer under the supervision of a suitability qualified Ecological Clerk of Works.
- Development levies and bond to be agreed with the Local Authority prior to commencement.


John O' Hara
Senior Executive Planner

Date: 28/07/25.


S.P.
28/7/25.