

Landscape Response

In respect of a Request for Further Information (RFI)

Ballyloo SID (ACP planning ref. 323860)

By Macro Works

August 2026



Introduction

This landscape response statement has been prepared in response to a Request for Further Information (RFI) issued by An Coimisiún Pleanála in respect of a planning application for a solar farm development in the townlands of Ballyloo, Knockbower, Linkardstown, Kilballyhue, Graiguenspiddoge, Castletown, Moyle Big, Leagh or Ballybeg, Kellistown West & Kellistown East, County Carlow. The RFI included the following item in relation to the Landscape and Visual Impact assessment produced by Macro Works.

RFI Item 12.

“While it is stated in several instances throughout the application documentation that the proposed development shall be carried out at the same time as the permitted Ballyloo Solar Farm (Carlow County Council Reference 24/60043 / An Coimisiún Pleanála Reference ABP-322347-25), every grant of planning permission is a stand-alone permission. In that context, the application includes three separate landscape mitigation plans for the three proposed substation options. With the exception of a proposed 30m section of hedging to the south of the proposed access from the L3050, the three plans do not show any landscaping proposals around the substations.

The three landscape mitigation plans do reference ‘Landscaping consented as part of the consented Ballyloo Solar farm’, which lies outside of the red line site boundary, but within the blue lined boundary identified on the application drawings.

As part of its submission on the application, Carlow County Council recommended the attachment of a condition that states ‘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’. Your response to the proposed condition stated that Carlow County Council had provided no context for it, including assessment of any impact (perceived or otherwise) on local receptors. You also stated that 32 linear metres of new and 15 linear metres of bolstered hedgerow are planned, while the three landscape mitigation plans are included reflecting the three substation options. You also stated that the LVIA confirms that there will be no material visibility resulting in landscape or visual impacts in the local environment. On that basis, you submit that no supplementary landscaping is required as the design approach ensures the substation would be successfully assimilated into the local landscape.

Section 1.5 of the Landscape and Visual Impact Assessment discusses the wider Ballyloo Solar farm and not just the proposed substation in isolation, and notwithstanding the statements made in the application, a grant of permission enures to the benefit of land and not the applicant. In addition, the verified photomontages submitted with the

application and the impact assessment set out in the LVIA are reliant on the landscaping scheme permitted as part of the Ballyloo Solar farm permission. Should a circumstance arise that the proposed substation and the permitted Ballyloo solar farm were not to proceed together as one project, it may be proved difficult or impossible to give effect to landscaping that is outside of the boundaries of the development proposed in this application, notwithstanding that it is to be carried out within the blue lined area identified on the location maps that form part of this application.

Therefore, it is considered reasonable that a revised set of layout plans is provided, identifying the entirety of the landscaping proposals that would be put in place to allow the impact assessment conclusion that have been set out in the LVIA to be reached, as they are represented in the LVIA photomontages. The response should also set out a commitment that the necessary landscaping works would be carried out as part of the substation development, in the event that the Ballyloo Solar Farm was not to proceed at the same time as the proposed substation."

Response to Landscape RFI Item 12

In the interests of providing a comprehensive appraisal and in direct response to RFI Item 12, an updated set of landscape plans has been submitted as part of this Further Information response. The updated plans provide for an extension of the red line boundary around the wider perimeter of the proposed substation options and identify specific landscape mitigation measures associated with the proposed substation options, including measures that are additional to those already consented as part of the permitted Ballyloo solar farm development (Carlow County Council Reference 24/60043 / An Coimisiún Pleanála Reference ABP-322347-25)

The red line boundary has been extended to the east and west of the proposed substation site to incorporate the consented solar site boundaries within which the relevant landscape mitigation measures are to be implemented. These areas include landscape proposals previously consented as part of the Ballyloo solar farm development, comprising the bolstering of sections of existing perimeter hedgerow vegetation and the establishment of new sections of native hedgerow. By incorporating these areas within the revised red line boundary, the updated proposals ensure that the landscape mitigation measures relied upon in the LVIA and represented within the submitted photomontages can be implemented as part of the proposed development independently of the permitted Ballyloo solar farm.

In addition to this, and specifically in response to the further information request, it is proposed to establish approximately 755 sqm of new native thicket planting add the site entrance where some 30 m of existing hedgerow will be removed. Once established, the new native thicket planting will heavily diminish the potential for any clear visibility of the proposed development from the adjacent local road and from its local surroundings.

With regard to hedgerow removal, in addition to the approximately 30 linear metres of existing hedgerow vegetation to be permanently removed to facilitate the site access, as previously consented under Carlow County Council Reference 24/60043 / An Coimisiún Pleanála Reference ABP-322347-25, approximately 2 linear metres of additional hedgerow removal will be required to facilitate the installation of the proposed underground cables to the west of the site entrance. This represents a very limited and localised intervention in the existing hedgerow network. Furthermore, this section will be fully reinstated following completion of the construction works in accordance with the Hedgerow Type 2 shown on the updated landscape plans.

For clarity, the landscape mitigation measures incorporated within the updated proposals comprise:

- **Hedgerow Type 1:** approximately 243 linear metres (as permitted under Ref. 24/60043 / ABP-322347-25);
- **Hedgerow Type 2:** approximately 283 linear metres (as permitted under Ref. 24/60043 / ABP-322347-25);
- **Native thicket planting:** approximately 755 m² (additional mitigation proposed as part of this Further Information response);
- **Permanent hedgerow removal:** approximately 30 linear metres to facilitate the site entrance (as permitted under Ref. 24/60043 / ABP-322347-25); and
- **Temporary hedgerow removal and reinstatement:** approximately 2 linear metres to facilitate the proposed underground cables, to be reinstated as per Hedgerow Type 2. 1 no. linear metre of removal / reinstatement related to Option A for the final underground grid connection cabling to the Kellis substation.

The revised landscape proposals therefore address the specific concern raised in RFI Item 12 regarding reliance on landscaping associated with a separate planning permission as well as the submission from Carlow County Council with regard to additional landscaping measures to soften and absorb visual impact. The applicant confirms that the landscape mitigation measures identified on the updated plans and required to achieve the landscape and visual outcomes assessed within the LVIA will be implemented as part of the Proposed Development.

Overall, the additional native thicket planting provides a further layer of screening beyond that previously assessed. The conclusions of the submitted LVIA therefore remain applicable, with the Proposed Development (each of the three substation options) capable of being successfully assimilated into its receiving landscape context without and significant visual effects.

RFI Item 13.

“In addition to Item 12 above, please submit verified photomontage taken from the proposed site entrance to the proposed substation from the L3050, with no trees in place, showing the three proposed substations and identifying any necessary landscaping proposals that would reduce or eliminate the views of the substation options, when viewed from the proposed entrance.”

Response to Landscape RFI Item 13

In response to Further Information Item 13, a new representative verified photomontage has been prepared from the entrance to the proposed substation options along the L3050 local road – RFI VP1. This viewpoint is representative of local community receptors travelling along the surrounding local road corridor and has been classified as having a Medium-low visual receptor sensitivity. From this location, all three substation options will be clearly visible across a short section of the local road corridor, most notably during the construction phase and early stages of the development, when the existing hedgerow vegetation has been removed to facilitate the proposed entrance and the proposed mitigation planting has not yet fully established. It is important to note that the proposed planting will be undertaken during the first month of the construction phase depending on weather conditions at that time. If conditions are not suitable there is the possibility of a slight delay of days/weeks however planting would then be undertaken at the earliest possibility. The construction phase will extend for approximately 24 months (inclusive of the proposed substation, grid connection and solar farm). Consequently, the early-stage planting will have the opportunity to establish over up to two growing seasons prior to the operational phase of the proposed development.

Whilst visual effects at this additional viewpoint (RFI VP1) will be relatively notable, they will be experienced only briefly, principally for the period of time required to travel along the short section of the local road adjoining the proposed substation entrance. Nevertheless, the proposed substation options will represent a notable degree of visual change along this otherwise relatively homogeneous stretch of local road. Of the three options, the GIS substation presents the greatest degree of built mass and vertical enclosure. The 220 kV AIS option presents the greatest overall visual envelope, with its multiple electrical components generating a greater degree of visual complexity and clutter within this otherwise typical rural setting. The 110 kV AIS option presents with the least visual presence of the three options, although it will nonetheless represent a notable degree of visual change from this location. In all three scenarios, approximately 30 m of existing roadside hedgerow will be removed to facilitate the proposed site entrance.

In terms of landscape mitigation, a new section of native hedgerow, consented as part of ACP Ref. 24/60043, is proposed along the alignment of the site boundary to the east of the substation options. The existing site boundary vegetation along the local road will also be enhanced, where necessary, and managed at a height of approximately 3–4 m. To the west, a new native thicket will be established along the inside of the proposed native hedgerow consented under ACP Ref. 24/60043. This thicket will comprise a mixture of native whips and advanced nursery stock and will be allowed to establish to a height of approximately 8–10 m.

The combination of the consented landscape measures and the additional mitigation proposed as part of this further information response will assist in anchoring the proposed development within the site and will progressively screen, filter and soften views of the proposed electrical infrastructure from surrounding receptors as the vegetation establishes. The clearest visibility of the proposed substation options will consequently relate to the approximately 30 m-wide opening in the roadside vegetation required to facilitate the site entrance, as depicted in RFI VP1. Views through this opening will be brief and transient for road users travelling along the L3050, with the proposed development otherwise increasingly screened and filtered by the retained, reinforced and proposed vegetation along the site boundaries.

Overall, the magnitude of visual effect is assessed as Medium for each of the three substation options. When combined with the Medium-low sensitivity of the visual receptors, the resulting significance of visual effect at RFI VP1 is assessed as no greater than **Moderate-slight**. Of the three options, the 110 kV AIS option presents a marginally lower visual presence than the GIS and 220 kV AIS options.

Overall, the additional prepare photomontage reinforces that, whilst a notable degree of visual change will occur from the immediate site entrance, this effect is highly localised and experienced over a very short section of the L3050. The revised landscape proposals submitted in response to RFI Items 12 and 13 provide an appropriate level of mitigation to progressively screen and soften the proposed development, and no additional landscape mitigation beyond these revised measures is considered necessary. In summary, the residual visual effects identified at RFI VP1 fall within the range of effects already assessed within the submitted LVIA. Thus, the additional assessment of RFI VP1 does not alter the findings or conclusions of the submitted LVIA.