

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

27th August 2026

Re: An Coimisiún Pleanála Reference ACP-323860-25– Request for Further Information Response. 10 year planning permission for a 220kV AIS/ 220kV GIS substation OR a 110kV electricity substation, associated 220kV or 110kV underground grid connection and ancillary works located in the townlands of Ballyloo, Knockbower, Linkardstown, Kilballyhue, Graiguenspiddoge, Castletown, Moyle Big, Leagh or Ballybeg, Kellistown West & Kellistown East, County Carlow.

HW Planning
5 Joyce House,
Barrack Square,
Ballincollig,
Cork
P31 KP84

www.hwplanning.ie
info@hwplanning.ie
+353 (0)21 487 3250

Directors:
Harold Walsh
Conor Frehill

Company Reg. No.
486211

Accreditations
ISO 9001:2015
ISO 14001:2015
ISO 45001:2018

Dear Sir/Madam,

We act on behalf of Ballyloo Solar Farm Limited., who wish to respond to the An Coimisiún Pleanála Request for Further Information (RFI) dated 22nd July 2026 regarding the above proposed development in the townlands at Ballyloo, Knockbower, Linkardstown, Kilballyhue, Graiguenspiddoge, Castletown, Moyle Big, Leagh or Ballybeg, Kellistown West & Kellistown East, County Carlow.

The following are the plans and particulars that support and are appended to this response:

- This response letter by HW Planning;
- Updated Site Layout and Technical Plans by Ballyloo Solar Farm Limited;
- Updated Landscape Plans by Macro Works;
- Site Entrance Drawing and Water Management Plans by CSEA Engineering Advisors;
- Updated Construction Method Statement by Ballyloo Solar Farm Limited;
- Updated Ecological Impact Statement and Natura Impact Statement by Ecology Ireland;
- Additional Photomontage Booklet and Landscape RFI Statement by Macro Works;
- Updated Site Specific Flood Risk Assessment by IE Consulting;
- Revised Environmental Impact Assessment Screening by HW Planning.

The proposed development has been amended having regard to the An Coimisiún Pleanála request. The request results in some minor design changes and clarifications which are detailed on the submitted revised site layout and landscape plans and comprise the following:

- Relocation of temporary construction compound to south of proposed substation location (same location) applies in respect of all substation Options A, B and C). The temporary construction compound will be accessed off the proposed internal substation access track.
- Localised relocation of HV Underground Grid Connection Cable at point of exit from proposed substation site and entry onto L3050 road. The cabling will leave the substation site and enter the road by means of an open-cut trench which will result in temporary landscape removal / reinstatement.

- Modifications to ‘Dry Deck Bridge’ at proposed substation site entrance. A slightly larger bridge structure will be laid for the temporary construction phase. The previously submitted smaller bridge structure will be used for the operational stage.
- Modifications to landscaping proposals at proposed substation site to include c.755 sqm of native thicket to be planted adjacent to the site access and temporary removal / reinstatement of c.2 metres of existing hedgerow to accommodate the above referenced relocation of HV Underground Grid Connection Cable.
- The updated design includes a water management plan (drawings).

It should be noted that review of RFI items has necessitated reconsideration of the red line boundary for the subject application. The application boundary has been updated and extended to account for the revised design, and specifically, the permitted landscape planting under Ballyloo Solar Farm (Carlow County Council Reference 24/60043 / An Coimisiún Pleanála Reference ABP-322347-25), as well as additional landscaping planting to the north of the proposed substation site.

01 Application Context

As set out in the submitted planning application, the purpose of the proposed development is to transport the electricity generated at the permitted Ballyloo, Park and Ballybannon Solar Farms to the national electricity grid via the existing 220/110kV Kellis substation. These are sizable consented solar farms which will make a significant positive contribution to, inter alia, the following:

- Addressing the climate and energy crises documented in European policy, which necessitates a significant scaling up of renewable energy targets under REPowerEU, and a pronounced requirement to rapidly reduce the EU’s dependence on Russian fossil fuels before 2030 by accelerating the clean energy transition.
- Reducing Ireland status as one of the most energy import dependent countries in the EU which carries significant risks in relation to security of energy supply. To reduce its dependency, Ireland must increase the level of energy from renewable energy sources.
- Meeting Ireland’s binding climate and renewable electricity targets for 2030 including achieving a 51% reduction in overall greenhouse gas emissions by 2030 and to reach net-zero emissions by no later than 2050. Based on national reporting, Ireland is on course to fail to achieve its 2030 climate targets, having already failed to achieve our 2020 targets.
- Meeting forecasted demand increases for electricity in Ireland which is projected to increase by between 19% and 50% above existing capacity in the next decade in line with economic forecasts.
- Achieving the requirements set out in the Department of the Environment, Climate and Communications published the Climate Action Plan. The plan stresses that “renewables-led system is at the core of Ireland’s plan to radically reduce emissions in the electricity sector, protect our energy security, and ensure our economic competitiveness. This requires the accelerated and increased deployment of new renewable electricity generation capacity and related infrastructure”. It is planned to increase the proportion of renewable electricity to up to 80% by 2030, and a target of 8 GW from solar by 2030.
- Meeting a multitude of planning policies and objectives related to the National Planning Framework¹, the Regional Spatial and Economic Strategy for the Southern Region², and Carlow County Development Plan 2022-2028³.
- Giving effect to the CRUs Enduring Connection Policy which sets the terms and conditions of electricity generators’ access to the electricity system and “prioritises, in the first instance,

¹ Sample National Policy Objectives 30, 70 and 71.

² Sample Regional Policy Objectives 87, 89, 90 and 95.

³ Sample County Development Plan Objectives RE P1, RE01, IF P1, and SE P2.

large renewable energy projects” in locations with viable grid connectivity. The proposed substation / underground grid connection will deliver a viable grid connection for 3 no. permitted solar farm projects (Ballyloo Solar Farm, Park Solar Farm and Ballybannon Solar Farm). It is important enabling infrastructure with significant environmental benefits.

It is evident that projects of the subject nature must be supported to address the current climate and energy crisis. We are directly contributing to the rise in temperatures and to the global threat of climate change that this rise is current and will further impose on future generations. Reaching climate neutrality will mean that Ireland will have no further negative impacts on the climate system by mid-century. In the long term, this represents an extremely ambitious target for Ireland to meet over the next three decades to 2050.

The purpose in having design flexibility options for this proposed development is due to the fact that EirGrid will assess the ‘least cost, technically acceptable’ method of connecting the project to the national network. The expected point of connection for the project will be the Kellis 220/110kV substation due to its proximity. However, depending on the outcome of their studies, EirGrid may conclude that the project should connect at either the 110kV side or the 220kV side of the Kellis substation. This will be driven by factors such as space/bay availability on the 110kV and 220kV busbars in Kellis; capacity of the 110kV and 220kV lines feeding power in and out of Kellis vis-à-vis the MW output of Ballyloo solar farm; and the interaction of the Ballyloo, Park and Ballybannon solar farms project with any other projects applying at the same time. As demonstrated in the application documentation and again in this RFI response, there are no significant environmental impacts associated with any of the options proposed.

We welcome the opportunity to address the queries raised by the Commission in this RFI, which are responded to in the next section.

02 Response to Request for Further Information

The Commission issued request included 13 no. items, which are addressed below in order for ease of reference.

Item 1 Temporary Construction Compound

The three drawings referenced below are the site layout plans for each of the three substation options proposed as part of the application’s proposed design flexibility. They are:

- BYLOO-DR-002 (Substation Option A - 110kV AIS Substation Site Layout Plan).
- BYLOO-DR-003 (Substation Option B - 220kV AIS Substation Site Layout Plan).
- BYLOO-DR-003 (Substation Option C - 220kV GIS Substation Site Layout Plan).

As well as showing the three alternative substation layouts, the three drawings also show the location of the proposed temporary site compound, which is to be sited in the same location and would be the same size in each of the three drawings.

In addition, Drawing BYLOO-DR-051 ‘Temporary Construction Compound’ shows a layout for the proposed temporary compound. It includes a note that states that ‘Final shape, size and layout configuration will be tailored to the particulars of the site. Refer to submitted site layout plans for further details’.

Having reviewed the four above referenced drawings, a number of issues arise, which are:

- (a) Drawing BYLOO-DR-051 does not contain a north point to indicate the indicative layout of the compound relative to the site boundaries, so it is not possible to determine the exact location of**

the proposed 'Vehicle Entrance and Wheel Cleaning Area', although it would appear most likely to be located in the easternmost corner of the site, at the point closest to the proposed entrance to the substation site from the L3050. Please provide a revised drawing BYLOO-DR-051 to include a north point and confirm the exact location of the Vehicle Entrance and Wheel Cleaning Area.

The Applicant notes the Commissions comments in respect of the submitted site layout plans and particularly in relation to the location of the proposed temporary construction compound. A comprehensive response has been prepared to inform the Commissions consideration of same under the corresponding RFI 1 sections (a) to (i) which are set out in the following paragraphs. It should also be noted that updated and additional new drawings (denoted with an *) have been submitted with this Further Information (FI) response. These drawings are listed below. Further context for the provision of these drawings is also provided in the following paragraphs.

- BYLOO-DR-001A_Overview Layout Plan
- BYLOO-DR-001B_Overview Key Layout Plan
- BYLOO-DR-002_Substation Option A - 110kV AIS Substation Site Layout Plan
 - » *BYLOO-DR-002A_Substation Option A - 110kV AIS Substation Site Layout Plan @1:500
 - » *BYLOO-DR-002B_Substation Option A - 110kV AIS Substation Site Layout Plan @ 1:500
- BYLOO-DR-003_Substation Option B - 220kV AIS Substation Site Layout Plan
 - » *BYLOO-DR-003A_Substation Option B - 220kV AIS Substation Site Layout Plan @1:500
 - » *BYLOO-DR-003B_Substation Option B - 220kV AIS Substation Site Layout Plan @ 1:500
- BYLOO-DR-004_Substation Option C - 220kV GIS Substation Site Layout Plan
 - » *BYLOO-DR-004A_Substation Option C - 220kV GIS Substation Site Layout Plan @1:500
 - » *BYLOO-DR-004B_Substation Option C - 220kV GIS Substation Site Layout Plan @ 1:500
- *BYLOO-DR-051(A)_Temporary Construction Compound Substation Option A
- *BYLOO-DR-051(B)_Temporary Construction Compound Substation Option B
- *BYLOO-DR-051(C)_Temporary Construction Compound Substation Option C
- BYLOO-DR-051_Temporary Construction Compound

In respect of Item (a) above, the submitted drawing BYLOO-DR-051 was a standard detail drawing showing the layout of the proposed temporary construction compound. This standard detail corresponded to the location of the compound which was indicated on the submitted substation site layout drawings BYLOO-DR-002, BYLOO-DR-003 and BYLOO-DR-004. The presentation of the compound on these drawings was consistent with many multiple substation applications which the Commission has consented without the need for further information. Notwithstanding, it is acknowledged that greater clarity could have been provided to show the construction compound, including its directional orientation, as part of the wider site layout. In that respect, a review of the compound location was undertaken and a decision made to relocate the compound to the southwest side of the proposed substation. This new location provides a more optimal temporary access by removing the requirement to provide an access track through a Fill Area associated with one of the substation options (refer also to RFI 1(d) response).

For clarity, it should be noted that the 'Vehicle Entrance and Wheel Cleaning Area', including a north point, is clearly indicated on drawings BYLOO-DR-051(A) & 051(B) & 051(C). The final detail will be set out in the final Construction Environmental Management Plan to be prepared by the Contractor and agreed with Carlow County Council in advance of the commencement of development.

- (b) None of the four drawings referenced above, include details of a finished ground level for the proposed temporary construction compound, or state whether or not it would require cut and fill to level the site, prior to its construction. Please provide revised drawings BYLOO-DR-002, BYLOO-DR-003, BYLOO-DR-004 and BYLOO-DR-051, indicating the proposed finished compound level. Please also include details, if necessary, of whether different temporary construction compound levels would be required, depending on which of the three substation options would be developed.**

The proposed temporary construction compound is c. 87m in length and 30m in width. The total area is therefore c. 2,610m². The topographic survey indicates that the existing ground is relatively flat in the new location for the temporary construction compound. In the south-west to north-east direction, the maximum level difference is 1.6m over an 83m span, representing a 2% slope. Similarly, in the south-east to north-west direction there is a 2% slope, with a level difference of 0.43m over a 25m span.

The existing ground topography in the compound area would typically be considered suitable for large areas designated for non-buildings and structures, i.e. the carpark area. However, in the event that the substation contractor finds the existing topography unsuitable, regrading works will be undertaken on the compound. In this event, the entire footprint of the temporary construction compound would be regraded to a level surface. The maximum cut/fill volumes would be cut of c. 550m³ and fill of c. 543m³. This will result in a finished ground level of c. 101.44m. It should be noted that this is without any geotextiles and crushed gravel used to create the finished surface. This is estimated to be 600mm of compacted gravel, however the depth of the sub-layer and top surface layers will be subject to ground conditions which will only be determined following a wider site investigation to be completed prior to detailed design and in advance of the construction phase of development. A permeable geotextile layer will be placed below the compacted gravel. The geotextile used will be subject to the site conditions however will be circa 5mm thick. As such, the finished compound level would be approximately 102.05m.

The temporary construction compound features several cabins, both for storage and office/welfare uses. These cabins typically have a finished floor level c.150mm above the compound level. The indicative FFL for all cabins shown within the temporary construction compound is c.102.20m.

The temporary construction compound is in the same location, with the same layout for all three substation design options. The compound including the assumptions referenced in this RFI response are shown on planning drawings BYLOO-DR-051(A) & 051(B) & 051(C).

- (c) It is noted that section 2.2.3 of the 'Site Access Report' states that 'As outlined in the submitted site layout plans, it is proposed to provide a temporary construction compound, accessed from the entrance from the L3050'. The facilities to be provided include 'parking space for both light and heavy vehicles'. However, the submitted layout plans do not reflect the statement above as none of the four layout drawings provide details of a means of vehicular access to the proposed temporary construction compound from the internal access track, that is to serve the three proposed substation options. Please submit revised layout drawings BYLOO-DR-002, BYLOO-DR-003 and BYLOO-DR-004 showing the proposed access route to the temporary construction compound for each of the three substation options, while taking into account the comments in item d) below.**
- (d) Reference is made in the public notices to 'Temporary construction...access'. Based on the submitted temporary compound layout in drawing BYLOO-DR-051 and taking into account the absence of a north point on that drawing, as well as the extent of the red lined site boundary, it would appear that the vehicular access to the temporary site compound could only be taken from**

the easternmost corner of the proposed temporary site compound, which is the point on the site closest to the entrance from the L3050. This raises another question, which is that while adequate land would be available to provide a temporary access road to the temporary construction compound based on the footprints of substation Options A and C, this would not appear to be possible in the case of Option B as per drawing BYLOO-DR-003 (Substation Option B - 220kV AIS Substation Site Layout Plan). That drawing indicates that the level of cut and fill that would be necessary for that option, would result in a difference of ground level of approximately 5m between the finished substation compound level and the bottom of the adjacent embankment, at the northernmost corner of the substation compound. If that option is selected, it is not considered that there would be adequate circulation space available to accommodate a vehicular access to the temporary site compound, within the identified red line boundary.

In respect of both (c) and (d) above, it is acknowledged that the submitted site layout drawings did not show the location of a temporary construction access track to service the temporary construction compound. As set out in the response to RFI 1(a), a review of the compound location was undertaken and a decision made to relocate the compound to the southwest side of the proposed substation. This new location provides a more optimal temporary access by removing the requirement to provide an access track through a fill area associated with one of the substation design options. The temporary access track will require stripping of topsoil, typically 300mm deep, and then placing of up to a maximum of 600mm of imported clean natural stone, such as SRW Type A to Clause 801 (Transport Infrastructure Ireland, Specification for Roads Works Series 800, Road Pavements) on top of a geotextile separation membrane between the stone and the subsoil.

For clarity, it should be noted that the temporary access track is clearly indicated on the below drawings:

- BYLOO-DR-002_Substation Option A - 110kV AIS Substation Site Layout Plan
 - » *BYLOO-DR-002A_Substation Option A - 110kV AIS Substation Site Layout Plan @1:500
 - » *BYLOO-DR-002B_Substation Option A - 110kV AIS Substation Site Layout Plan @ 1:500
- BYLOO-DR-003_Substation Option B - 220kV AIS Substation Site Layout Plan
 - » *BYLOO-DR-003A_Substation Option B - 220kV AIS Substation Site Layout Plan @1:500
 - » *BYLOO-DR-003B_Substation Option B - 220kV AIS Substation Site Layout Plan @ 1:500
- BYLOO-DR-004_Substation Option C - 220kV GIS Substation Site Layout Plan
 - » *BYLOO-DR-004A_Substation Option C - 220kV GIS Substation Site Layout Plan @1:500
 - » *BYLOO-DR-004B_Substation Option C - 220kV GIS Substation Site Layout Plan @ 1:500
- *BYLOO-DR-051(A) Temporary Construction Compound Substation Option A
- *BYLOO-DR-051(B)_Temporary Construction Compound Substation Option B
- *BYLOO-DR-051(C)_Temporary Construction Compound Substation Option C

The cut and fill levels are addressed above and in the updated Construction Method Statement. Access to the revised location of the temporary construction compound is not impacted by these design levels. In addition, and in response to the RFI point made in relation to a possible 5m difference in site levels between the substation compound level and the adjacent lands, it should be noted that this is not the

case. The compound level was chosen based on the existing levels identified from the topographical survey. The level was chosen to balance the cut and fill volumes as closely as possible and to minimise the required embankments. The design assumption is that the compound level will meet the existing ground level with a slope no greater than 1:2 (roughly 26 degrees)⁴. As such there is no 'drop-off' i.e. if there is a 5m level difference between the FCL and existing ground level, these will be sloped over a minimum of 10m. The various layouts show where greater level differences result in larger sections of cut/fill. Site investigations will be needed to determine the final volume of cut, if any is suitable for fill material. This will also depend on EirGrid standards. Any unused cut material will be transported off site to a suitably licensed facility.

- (e) Please provide details of the source of water that would serve the welfare facilities and the wheel cleaning area at the proposed temporary compound, which would be in place for the duration of the proposed construction phase which is stated to be 24 months (together with the Ballyloo Solar farm).**

Water to serve the welfare facilities and the wheel cleaning area at the construction compound will be stored in on-site temporary water storage tank or bowser. The specification for the water storage tank or bowser will be set out in the final Construction Environmental Management Plan to be prepared by the Contractor and agreed with Carlow County Council in advance of the commencement of development. Typically, on construction sites of this nature, tanks or bowzers have an approximate capacity of 6000 litres and it would be anticipated that up to 10. no tanks or bowzers would be required at peak construction times. These tanks or bowzers would be stored in a dedicated area within the temporary construction compound. The storage tank or bowser will be periodically filled as required, likely every 1-2 weeks depending on water usage during the different construction stages. The provision of such temporary facilities is considered a standard requirement on infrastructure construction projects. The location of the temporary water storage tank or bowser is shown on drawings BYLOO-DR-051(A) & 051(B) & 051(C).

The final specification for temporary works associated with the construction compound will be set out in the final Construction Environmental Management Plan to be prepared by the Contractor and agreed with Carlow County Council in advance of the commencement of development.

- (f) A note on drawing BYLOO-DR-051 'Temporary Construction Compound', states that 'All surfaces to be finished in either crushed rock or temporary composite matting'. The overall construction compound site has a surface area of 2,610sqm (87m x 30m). Temporary composite matting is generally not a permeable surface, and, if used, could lead to a significant change in the surface water regime, which is particularly relevant as an open drain runs along the inside of the public road and close to the north eastern boundary of the proposed temporary construction compound. Based on the topography, which slopes downhill from the temporary compound site, in a north eastern direction towards the open ditch / stream, that in turn runs downhill and in a northwestern direction, it would appear that this stream would flow into the Ballybannon stream, c300m northwest of the site, which in turn flows into the River Barrow c6.5km downstream of the site.**

Please provide details of how it is proposed to protect this waterbody from potential sediment and pollutants that could run off the temporary compound site, including from the wheel wash area, directly overland to the stream. It is also noted that paragraph 7.2.1 of the Flood Risk Assessment references routine wheel washing. Is this referring to the proposed wheel wash at the temporary construction compound or another wheel wash. Please update all necessary drawings, the AA Screening Report, NIS and other reports as appropriate, to reflect the details to be provided in response to this request.

The construction method for the temporary construction compound will be as follows:

⁴ This applies equally to any cut and fill calculations and any embankments associated with both the substation compound and the temporary construction compound.

- The temporary site access will be constructed as described in RFI (b)(c)(d);
- The compound area will be fenced and secured to delineate the extent of the site, prevent unauthorised access and protect the surrounding environment;
- As required, the underlying soil material will be excavated and stockpiled separately, then profiled and surrounded in silt fencing. The underlying soil material will only be excavated to create a level platform area for the compound;
- If the underlying soil material is suitable, it will be used to create a level platform and so reduce the need for stockpiling and import of granular stone material;
- Geotextile materials will be placed on the platform area to improve the ground and to facilitate the subsequent removal of any imported granular material after construction. It is noted that the RFI indicates that 'composite matting is generally not a permeable surface'. In this respect, it should be noted that only permeable geotextile materials will be used.
- Imported granular stone material will be placed and compacted in layers to create a level platform area, typically up to 600mm thick; and
- Stores and offices will be set-up, parking areas, etc and pedestrian walkways etc. will be created as shown on drawings BYLOO-DR-051(A) & 051(B) & 051(C).

On completion of the works, the area of the temporary construction compound will be decommissioned. It should be further noted that this land is shared by the adjacent Ballyloo Solar Farm (Carlow County Council Register Ref: 24/60043; An Coimisiún Pleanála Ref: ABP-322347-25) and similar to the temporary construction compounds associated with that permitted development, will have solar panels installed prior to the operation of the solar farm.

The final specification for temporary works associated with the construction compound will be set out in the final Construction Environmental Management Plan to be prepared by the Contractor and agreed with Carlow County Council in advance of the commencement of development.

As stated in the RFI, there is an existing drain located to the east / northeast of the substation compound and temporary construction compound⁵. This response includes a water management plans (drawings) by CSEA Engineering advisors which demonstrates proposals to protect this waterbody from potential sediment and pollutants that could run off the substation site and temporary compound site during the construction phase. These plans are set out in the following drawings:

- *2025-09-10_Proposed Construction Water Management Plan Layout
- *2025-09-10_Proposed Construction Water Management Plan – Temporary Compound Land Drainage & Soakaway

The plans indicate that construction phase water management mitigation will include a sub-base drainage network, use of petrol interceptors; silt fences; settlement pond; and soakaway. Further detail on these measures is also contained in the updated Construction Method Statement provided with this response. It should be noted that the drainage proposals for the operational substation compound remain unchanged from the content of this RFI.

The reference in Section 7.2.1 of the Flood Risk Assessment to routine wheel washing relates to that during the temporary construction phase only. The water management design includes a contained collection point feeding to petrol drainage interceptor). The FRA has been updated to reflect this design detail, as has the Ecological Impact Assessment and Appropriate Assessment / Natura Impact Statement. These reports objectively conclude that the proposals will not result in any significant

⁵ This is not identified as a stream / watercourse on any formal mapped datasets.

impacts on flood risk, ecology or designated Natura 2000 Site, the latter having regard to prescribed mitigation.

- (g) *What quantity of soil, if any, would be required to be excavated to facilitate the construction of the temporary construction compound and where and how would the excavated material be stored for the approximately two year duration of the build out of the proposed development, ensuring that it does not cause runoff and/or sedimentation in the nearby watercourse, or the creation of a dust nuisance.***

The construction compound will require cut and fill volumes of c.550m³ and c.543m³ respectively. This will result a surplus balance of 7m³ which is considered an insignificant volume. Excavated soils will be temporarily stockpiled onsite for re-use during as part of proposed landscaping. Stockpiles will be restricted to less than 2m in height and located in an appropriate location a minimum of 10m from the nearest drain. An Ecological Clerk of Works (ECoW) will be appointed to ensure that all ecology and water related construction mitigation as set out in the Ecological Impact Assessment is correctly implemented on-site.

The above referenced confirmations in site levels and associated potential runoff controls have been also been considered in the updated Ecological Impact Assessment and Appropriate Assessment / Natura Impact Statement. These updated assessment confirm the original reporting findings, namely that there is no potential for significant impacts on local ecology, and there will be no risk of adverse effects on the Qualifying Features of Natura 2000 sites within this project's Zone of Influence.

- (h) *Following on from f) above, the open drain running along the public road is not referenced in the flood risk assessment the AA Screening Report or the NIS, although it is proposed to install a dry deck over the stream. On the occasion of the site visit, during wet conditions, a significant volume of water was flowing in the stream. The three proposed substation layout plans (BYLOO-DR-002, BYLOO-DR-003, BYLOO-DR-004) show the same indicative route of the underground cable running through the proposed (Dry Deck Cable Bridge – as shown in Drawing BYLOO-DR-047), which provides both and elevation and section drawing of the proposed deck. The section of the bridge in Drawing BYLOO-DR-047 is shown to be only 3m deep, while the width of the bridge is shown to be 12m. The submitted drawing BYLOO-DR-047 does not seem to represent an accurate reflection of the proposed route of the proposed underground cable as it is outlined in the three site layout plans and it appears to be a generic drawing rather than a site specific one. It is also noted that the proposed underground cable would be located close to the surface where it crosses over the stream within the dry deck, but would be carried in a trench with a depth of up to 1.425m either side of the dry deck. In order to demonstrate that the proposed development would not have a negative impact on the watercourse that is to be crossed by the dry deck, please provide a detailed construction methodology to be employed in the construction of the proposed dry deck, including accurate and fully dimensioned plans and section drawings showing the full extent of the proposed dry deck and sections showing how the underground cable would be protected on either side of the dry deck, particularly on the eastern side of the L3050, where it would run within the public road. Please also address how the watercourse would be protected during the construction phase and indicate if the proposed works would involve any instream works. The proposed hollow chambers in the dry deck bridge should be capable of carrying all of the proposed cables that would be required to run through the deck. Any changes to the proposed development as a result of the above should be reflected in the suite of revised drawings and documents, including if necessary, revisions to the EIA Screening, AA Screening Report and NIS.***

The grid connection cable for each of the 3 no. design options can be accommodated within the dry deck bridge crossing proposed near the entrance to the substation. However, having reconsidered alternative options for crossing this drain, it has been decided to optimise an open trench crossing of this drain. This trench will require in-drain works. Open drain trenches are commonly used for minor agricultural ditches, dry drains, or small streams. Contractors excavate the channel directly, lay the ducted high-voltage cables, and restore the bed and banks to original conditions. This is a commonly

used method which the Commission has consented on many multiple electricity transmission applications.

The open trench method crossing of streams and rivers (and in this case a drain) can be carried out by “damming and fluming”. Open trench dam and flume will involve damming the drain upstream and downstream of the proposed trench and placing an appropriately sized (usually 500mm to 1000mm diameter) flume pipe between the two dams to allow the water to flow through the pipe creating a dry cell in between the two dams.

Silt traps, such as geotextile membrane, straw bales etc. would be placed downstream of the trenching location prior to construction to minimise silt loss. The dam would be constructed using sand bags and suitable clay material.

The trench ducting installation works will be carried out in the dry drain bed and under/around the flume pipe(s). If required, a temporary sump will be established and used to collect any additional water. This water will be removed by pumping to a percolation area if the soil is not saturated, otherwise a settlement tank will be used to remove any solids from the de-watering.

The proposed construction approach is set out in the submitted Ballyloo Substation & Grid Connection - Construction Method. It is ecologically beneficial and is less likely to stir up suspended solids than pumping and there are no mechanical parts to break down. It would be expected that these works would take approximately 2-3 days.

The location of the additional open trench grid connection cable crossing is indicated on the below drawings:

- BYLOO-DR-002_Substation Option A - 110kV AIS Substation Site Layout Plan
 - » *BYLOO-DR-002A_Substation Option A - 110kV AIS Substation Site Layout Plan @1:500
 - » *BYLOO-DR-002B_Substation Option A - 110kV AIS Substation Site Layout Plan @ 1:500
- BYLOO-DR-003_Substation Option B - 220kV AIS Substation Site Layout Plan
 - » *BYLOO-DR-003A_Substation Option B - 220kV AIS Substation Site Layout Plan @1:500
 - » *BYLOO-DR-003B_Substation Option B - 220kV AIS Substation Site Layout Plan @ 1:500
- BYLOO-DR-004_Substation Option C - 220kV GIS Substation Site Layout Plan
 - » *BYLOO-DR-004A_Substation Option C - 220kV GIS Substation Site Layout Plan @1:500
 - » *BYLOO-DR-004B_Substation Option C - 220kV GIS Substation Site Layout Plan @ 1:500
- *BYLOO-DR-051(A) Temporary Construction Compound Substation Option A
- *BYLOO-DR-051(B)_Temporary Construction Compound Substation Option B
- *BYLOO-DR-051(C)_Temporary Construction Compound Substation Option C
- *BYLOO-DR-061_Layout for HV Cable Stream-Drain Crossing
- *BYLOO-DR-062_HV Cable Stream-Drain Crossing Trench

The final specification for the cable crossing at this location will be set out in the final Construction Environmental Management Plan to be prepared by the Contractor and agreed with Carlow County Council in advance of the commencement of development.

This response is also accompanied by an updated Dry-Deck Detail drawing by CSEA Engineering Advisors, as set out below:

- *2025-09-10-03-D01_Proposed Construction Water Management – Entrance 1 Dry Deck Details

The above drawing includes long-sections of the proposed dry deck crossing. It should be noted that two versions of the dry deck crossing are now proposed. One version is a temporary crossing for construction phase only. The full extent of this dry deck crossing is shown on the above drawing. This crossing is appropriately designed to facilitate construction phase traffic including the largest vehicles associated with the delivery of the proposed substation transformer. As set out in the Construction Method Statement, the construction method for installation of the deck involves assembling prefabricated structural elements without any in-drain works.

- Roadside drainage at the entrance will be carried in the proposed 450 diameter roadside pipe drain. The drainage pipe will be carried over the existing drain at the northern end of deck (and will not require any in-stream works). Any water captured in this drain will be directed to a soakaway and not the drain beneath the deck⁶.
- The deck parameters will be confirmed by an accredited bridge designer following site survey / investigations.
- All bearing slabs, edge beams and the deck itself will be manufactured offsite and delivered to site installation ready.
- A base of compacted stone fill will be excavated under supervision from the ECoW at two agreed defined points set back from the drain bed and edges. The works area for this excavations will be contained by means of silt fencing, protecting any downslope gradients.
- The pre-cast bearing slabs will be placed on the stone fill.
- All load bearing beams and the deck itself will be assembled using dry joints and fixed to bearing slabs with an anchoring system.
- No wet concrete or pouring will take place on site.

- (i) *While reference has been made in h) above to a dry deck bridge, and a drawing has been provided of a dry deck bridge at the proposed entrance to the proposed substation site, it is also noted that Figure 5.4 in the Site Access Report, and Appendix A to the Site Access Report, both which demonstrate the Swept Path Analysis of Entrance 1, includes a note that states 'New Roadside drainage to be carried in new 450mm Ø (diameter) concrete pipes surrounded in concrete during both the construction and operational phases'. In addition, sections 8.3 and 9.6 of the Site Access Report also refer to the installation of 450mm diameter pipes parallel to the site entrance and the use of soakpits. Please clarify these statements in the context of item h) above and in the context that other submitted documents state that no instream works are to be carried out as part of the proposed development, which would not be correct, if it is intended to install roadside drainage pipes in an existing roadside drainage ditch.*

⁶ During the operational phase, the pipe drain will connect to the soakaway for the substation compound, as depicted on the originally submitted plans.

The roadside drainage pipe referenced in the Site Access Report (RFI item 1(i)) is a proposed c. 450mm interceptor for surface water generated within the development, consistent with a standard planning condition against surface water discharging from the site to the public road. This is illustrated on the updated drawing 2025-09-10-03-D01_Proposed Construction Water Management – Entrance 1 Dry Deck Details prepared by CSEA Engineering Advisors. The drainage pipe will be carried over the existing drain at the northern end of deck (and will not require any in-stream works). Any water captured in this drain will be directed to the compound soakaway and not the drain beneath the deck.

Item 2 Temporary Construction Compound

This application was lodged with the Commission on the 7th of November 2025, and on the 13th of November 2025, the Commission approved a development described as ‘Proposed development along a section of the N80 Road known as the N80 Leagh Bends Scheme’, under ACP-321416-24. Application ACP-321416-24 is referenced in a number of the reports accompanying this application and the two sites intersect along the grid connection route. Drawing BYLOO-DR-012, which is one of the Site Layout Plan (Grid Connection Route) drawings, indicates that the route of the proposed underground grid connection cable, at the junction of the L3050 and the L30504 roads, would follow the alignment of the existing roads at the junction. However, as a consequence of the approval issued under ACP-321416-24, the junction of the L3050 and the L30504 will be realigned and moved north-westwards meaning that the current junction would no longer be part of the public road. In parallel with case 321416-24, the County Carlow CPO No. 1 of 2024 - N80 Leagh Bends Scheme (ACP 321417-24) was also confirmed by the Commission on the 13th of November 2025, which facilitates the acquisition of lands to allow construction of the permitted road improvements. The CPO includes lands to the northwest of the current junction of the L3050 and L30504. You are advised to consult with TII in respect of whether it is necessary to revise the alignment of the proposed underground cable at this location, to follow the alignment of the permitted realigned junction, or if there is a requirement to provide for any additional safeguarding to be carried out as part of the proposed cable laying, if it is carried out in advance of the permitted N80 upgrade works. It is noted that TII has recommended conditions be attached to any approval issued, but the sequence of development of the N80 upgrade and the proposed underground grid connection cable is not yet known. In that context, the condition proposed by TII may not adequately address the potential interactions of and consequences of the cable and the road works on each other, bearing in mind that the uncoordinated planning or consenting of the two proposals has the potential to introduce a significant and costly constraint that could impact on the development and delivery of the N80 upgrade scheme or could result in the need for cable relocation, as part of the road scheme. The consequences of disconnecting the proposed grid connection cable, could result in an electricity outage that could directly affect the ability of the three consented solar farms (Ballyloo, Park and Ballybannon) to export electricity to the national grid for an indefinite period of time, which would have a consequent and direct effect on the delivery of renewable energy to the national grid. Following consultation with TII, please submit any additional or amending drawings and details of this section of the proposed underground cable to the Commission for further consideration, including if necessary, consent to lay any part of the proposed cable on lands outside of the original red lined site boundary.

The Applicant notes the Commissions approval of the N80 Leagh bends Scheme under ACP-321416-24 and the proposed realignment of some existing roads at junctions. This realignment has the potential to impact on the route of the proposed grid connection at the below junctions:

- Junction of the L3050 and L30504; and
- Junction of L3050, N80 and L7148.

The Applicant has overlaid the boundaries of the approved N80 Leagh Bends Scheme on the route of the proposed grid connection route as shown on the below drawings:

- *BYLOO-DR-061_Grid Connection Cable - N80 Leagh Bends Scheme Interaction 1
- *BYLOO-DR-062_Grid Connection Cable - N80 Leagh Bends Scheme Interaction 2

As shown on these drawings, the original red line planning boundary, which was originally located within the existing local roads, is still located entirely within the boundaries of the new proposed realigned local roads. In addition, in the case of the junction of the L3050, N80 and L7148 the HDD remains unaffected by the proposed realignment. There is therefore no material impact on the proposed route of the underground grid connection cable options associated with the N80 Leagh Bends Scheme. There is no requirement to alter the red line boundary in these locations. However, following on from the design review undertaken, a minor modification to the cable route has been made within the unchanged red line boundary. This modification is presented in an updated drawing, as follows:

- * BYLOO-DR-012_Site Layout Plan (Grid Connection Route)

It is noted also that both Carlow County Council and TII did not raise any concerns or objection to the proposed cable route in the vicinity of this realignment scheme.

The Applicant has consulted with Carlow County Council as part of this RFI response. The Council has advised that the N80 Leagh Bends Scheme is intended to proceed and that the Council is awaiting approvals to commence with acquiring the lands and starting pre-construction testing and archaeological assessment. It is assumed that this work will be tendered in Q4 2026 and completed by mid-2027. Following this, a Construction Contractor would be appointed in Q4 2027 with a view to potentially commencing construction in Q1/Q2 2028. Construction would be expected to last approximately 2 years. These timelines are subject to change and it should be noted that funding and approvals from various agencies, including TII, are required at different stages.

The Council has confirmed its willingness to further engage and consult with the Applicant throughout the process to ensure that all interfaces between the N80 Leagh Bends Scheme and the underground grid connection cable associated with the proposed development can be appropriately managed.

The Applicant appreciates that ongoing engagement with both the Council and TII in respect of these works is important, and particularly so in respect of construction programmes. As set out in the submitted the Applicant will consult with the Council and TII in advance of the construction stage of development to ensure any updates in respect of the N80 can be considered both in the detailed design and in the preparation of related Construction Environmental Management Plans, Traffic Management Plans, road opening licenses etc.

With respect to the Commission's request to consult with TII, it should be noted as per section 5.7 of the 'Ballyloo Substation & Grid Connection - Construction Methodology' report that TII Land Use Planning have previously advised the Applicant that it will not engage directly with the applicants as part of the planning process and will only consult with the respective planning authorities in its role as a prescribed body. In addition, TII Network Management / Third Party Works, who the Applicant will need to engage with in respect of any works with potential to impact on the national road network during construction, have confirmed they will only engage with Applicants (developers) on developments that have already secured planning permission. Notwithstanding, and as set out in this response and in the submitted Construction Methodology report and in the Access Report, the Applicant is committed to consulting with TII at the appropriate time in the future and this has been accepted by TII in its submissions to the Commission on this application.

Item 3 Site Specific Flood Risk Assessment

The word DRAFT appears on a number of the pages of the Site Specific Flood Risk Assessment (SSFRA). Please clarify if the submitted document is a draft document, or if the DRAFT watermark was left on the final document in error. If the submitted SSFRA is not the final document, please submit a revised copy of the document and highlight the instances where the text or images in the document differ from the originally submitted SSFRA.

The submitted Site Specific Flood Risk Assessment (SSFRA) was not a 'draft' document. The presence of a 'draft' watermark on some pages in the document has been attributed to a formatting issue with the

final PDF. Notwithstanding this, the SSFRA has been updated to reflect some of the Commission's request items and is included with the subject response. In consideration of the type and form of development proposed, this Site Specific Flood Risk Assessment indicates that the proposed substation and grid connection development is not predicted to result in an adverse impact to the hydrological regime of the area or increase flood risk elsewhere and is therefore considered to be appropriate from a flood risk perspective.

Item 4: Number of Construction Compounds

Section 5 of the Ecological Impact Assessment sets out mitigation measures including 'General Environmental Controls and Mitigation', which refers several times to 'proposed site compounds'. Is it proposed to have more than one site compound serving the overall development, and if yes, please submit the relevant plans for the additional compounds and update all documentation as necessary, as the documentation available on the file only indicates that one compound would be constructed, adjacent to the proposed substation at Ballyloo.

We can confirm that the reference to 'site compounds' plural was a typographical error in the submitted Ecological Impact Assessment. There is only one temporary construction compound at the proposed substation site. The EclA has been updated accordingly.

Item 5: Hedgerow Removal for the final Underground Cable Connection to Kellis substation

Section 4.4 of the ECIA indicated that Option B for the final connection to the Kellis substation would require the temporary removal of 5m of hedgerow. As Option B is proposed to access Kellis substation site via the public road and the substation access road, please clarify where the 5m of hedgerow is located and amend the submitted reports to reflect this statement, if necessary, as the EIA screening and AA screening reports only refer to the need to remove 1m of hedging to facilitate Option A for access to Kellis substation.

We can confirm that there is no hedgerow removal associated with Option B final underground cable connection to the Kellis substation. Option B is located within the L30535 local road which provides road access into the existing 220/110kV Kellis substation. The EclA has been updated accordingly.

Item 6: Construction Stage Water Supply

Section 4.5.1 of the Construction Methodology Statement referring to 'Water Supply' states that 'It is proposed to provide the required potable water demand of the station (all options) with a bored well on site'. It also states at paragraphs 4.1 and 4.2 that 'A temporary construction compound with appropriate mobile sanitary facilities will be set up to facilitate the construction process'. It is noted that the temporary construction compound may be in situ for 2 years and will include offices, welfare facilities and at least one wheel wash area. What are the estimated water requirements of the proposed temporary construction compound and from what source is it intended to supply those water requirements, during the construction phase of the development.

As confirmed under the response to Item 1(e), water to serve the welfare facilities and the wheel cleaning area at the construction compound will be stored in on-site temporary water storage tank or bowser. It is anticipated that up to 10. no tanks or bowser would be required at peak construction times. These tanks or bowser would be stored in a dedicated area within the temporary construction compound. The storage tank or bowser will be periodically filled as required, likely every 1-2 weeks depending on water usage during the different construction stages. The provision of such temporary facilities is considered a standard requirement on infrastructure construction projects. The location of the temporary water storage tank or bowser is shown on drawings BYLOO-DR-051(A) & 051(B) & 051(C). The specification for the water storage tank or bowser will be set out in the final Construction Environmental Management Plan to be prepared by the Contractor and agreed with Carlow County Council in advance of the commencement of development.

Item 7: SFRA Consideration of Temporary Construction Compound

Section 7.2.1 of the Site Specific Flood Risk Assessment states that ‘a Construction Methodology report has been prepared for the proposed substation and grid connection’. However, it appears that no consideration has been given to the potential impacts of the temporary construction compound that would be built close to the northern boundary of the proposed substation and would be in situ for at least two years. Please submit a revised Site Specific Flood Risk Assessment that includes consideration of the proposed temporary construction compound, including the proposed surface treatment for that part of the site and any associated potential surface water runoff mitigation measures proposed, as it has previously been noted in item 1 f) above that it is possible that the surface of the construction compound could consist of an impermeable finish that could lead to an increased potential for surface water flooding in the area.

An updated SFRA has been prepared having regard to the above, which appropriately considers the proposed temporary construction compound, including the proposed surface treatment. It has been objectively concluded that the proposals will not give rise to any potential flood risk impacts. The proposed development will not result in any adverse impact to the hydrological regime of the area or increase flood risk elsewhere.

Item 8: Site Access

Reference is made at section 9.7 of the Site Access report to site gates being set back at a distance from the road edge. The submitted plans do not provide any details of site access gates. Please provide details in plan and elevation form of the proposed site access gates. Will permanent gates be provided at the entrance from the L3050, post construction, and if they are to be provided, details of same should be provided for further consideration.

As referenced in this RFI, the submitted plans did not reference details of a permanent site access gate to the field in which the substation is located. It should be noted that both the EirGrid compound and the IPP compound forming the overall substation have security gates and fencing as shown on the submitted layouts drawings BYLOO-DR-002 & 003 & 004. In addition, the gate/fence standard detail for these compounds is also shown on the submitted drawing BYLOO-DR-048. Notwithstanding, it is acknowledged that the boundary of this development would be better defined with a permanent gated entranceway. As such, the same permanent gate which has been permitted for the adjacent Ballyloo Solar Farm (and indeed the Park and Ballybannon Solar Farms) is proposed at the entrance to this site. It is considered that the use of a gate design in keeping with what has been permitted previously by Carlow County Council (and on appeal by the Commission) is appropriate at this location. The location of the new gate is indicated on the below drawings:

- BYLOO-DR-002_Substation Option A - 110kV AIS Substation Site Layout Plan
- BYLOO-DR-003_Substation Option B - 220kV AIS Substation Site Layout Plan
- BYLOO-DR-004_Substation Option C - 220kV GIS Substation Site Layout Plan

In addition, a new drawing showing the gate in plan and section is also provided as per below.

- *BYLOO-DR-060_Entrance Gate Details

It should be noted that the entrance way at this location from the L3050 remains unchanged and the sightline splays as indicated in the submitted Access Report remain unchanged. The 90m sightlines are available at the proposed location. The vertical geometry of the road is essentially flat at the entrance location and the visibility to the 1.05m high object is achieved over the full ‘Y-Distance’ of 90m in both directions. The ‘Z-Distance’ of 35m is also achieved within the site boundary at this location.

Item 9: Potential Pavement Widening

Section 9.3 of the Site Access report states that it may be beneficial for the pavement to be permanently widened in one or two locations to provide enhanced passing opportunities for vehicles along these local roads. In the same paragraph, it is stated that the roads can accommodate all construction traffic. What is the purpose of this statement in the context of the application being considered by the Commission and what are the implications for the applicant of not carrying out the suggested improvements, notwithstanding that the locations of the referenced improvements have not been identified.

This statement relates to potential use of temporary passing-bays as part of possible traffic management considerations to be agreed with the local authority at construction stage. Some local authorities seek the consideration of such measures, where necessary. It represents a potential mitigation for possible traffic delays on roads approaching solar farm development sites only. To be clear, the completed traffic assessment has confirmed that the local road pavement is adequate to cater for all construction related deliveries.

Item 10: Abnormal Load

Figure 5.4 in the Site Access Report, and Appendix A to the Site Access Report, both which show the Swept Path Analysis of Entrance 1 indicate that a portion of the swept path would extend over the area to the south of the dry deck access bridge. Please provide additional details, including drawing of the swept path for the longest possible vehicle accessing the site, as it moves over the dry deck bridge onto the site from the L3050 and confirm that the current proposed access arrangement is adequate to safely allow for the movement on and off the site of the vehicle that would be used for abnormal loads, as identified in Figure 5.3 of the Site Access Report.

As noted previously, this response is also accompanied by an updated Dry-Deck Detail drawing by CSEA Engineering Advisors, as set out below:

- *2025-09-10-03-D01_Proposed Construction Water Management – Entrance 1 Dry Deck Details

This drawing includes a swept-path analysis for the special delivery vehicle (abnormal load) for the substation transformer. The deck for the construction phase is sized to cater for this delivery. It has been demonstrated that this delivery can be completed, with safe access and egress. As highlighted, a smaller deck will be used at the operational stage of the project.

Item 11: Possible Road Closures

Section 9.1 of the Site Access Report provides details of a Stop/Go system that would be operated to control traffic on the L3050 while construction vehicles access and egress the proposed site entrance. What traffic mitigation measures are proposed to be put in place while the proposed site access is being constructed, bearing in mind that the submitted documents indicate that either or both a dry deck bridge and a series of 450mm diameter pipes are to be installed to allow for the construction of the site access. These works would necessitate a road closure, unless it is intended to construct the access from within the site, by accessing the site from a different location within the wider site of the permitted Ballyloo Solar farm.

The L3050 road pavement at the proposed site entrance comprises 2 no. clearly defined 3m lanes with wide verges. A road closure is not envisaged for the construction of the works given the carriageway width available. A single lane closure with a Stop/Go traffic management system is proposed. The dry deck is proposed to facilitate the crossing of a land drain. The 450 diameter pipe is proposed to facilitate road side drainage in the verge and to prevent any surface water from the development running onto the public road. There is no requirement for a road closure to facilitate the subject works.

Again, all salient matters will be discussed and agreed with Carlow County Council prior to construction as part of the pre-commencement CEMP.

Item 12: Proposed Landscaping

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 lined 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 discuss 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 ensures 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.

As noted in the submitted application, the proposed development forms part of a dual consent planning process. The subject substation is necessary to export the renewable energy generated under permitted Ballyloo Solar Farm (Carlow County Council Reference 24/60043 / An Coimisiún Pleanála Reference ABP-322347-25) to the national transmission network. Given that the solar farm cannot function without the substation / grid connection, there is certainty that the two components of the project will be constructed concurrently, as presented in the application documentation. The proposed landscaping permitted under Carlow County Council Reference 24/60043 / An Coimisiún Pleanála Reference ABP-

322347-25 was designed in consideration of the substation element and the dual benefits it would provide in assimilating the substation into the local environment. The submitted revised Landscape Mitigation Plans LD.BLLYLOO-SID_RFI 3.1, LD.BLLYLOO-SID_RFI 3.2 and LD.BLLYLOO-SID_RFI 3.3 replicate the landscaping consented as part of Ballyloo Solar Farm, ensuring it forms part of the proposed SID application before the Commission also.

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 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. The Applicant is happy for the Commission to include a suitably worded planning condition to any grant of permission specifying that the full suite of landscaping proposals, as detailed on the updated landscape plans, be provided under the subject case.

In addition to this, and reflecting commentary in the further information request, it is proposed to establish approximately 755 sqm of new native thicket planting at 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. As the planting establishes and matures, it will provide additional screening and visual containment of the proposed electrical infrastructure and further assimilating the proposed development into the surrounding landscape.

Item 13: Photomontages

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.

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. 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 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 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.

Concluding Remarks

Pronounced Need for the Project

European and national policy is unequivocal that we are in the midst of climate and energy crises. The extent of the problem is laid bare in the Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report (August 2021) for the United Nations which confirms that to preserve a liveable climate for people, greenhouse gas emissions must be reduced to net zero by 2050. The IPCC state that

that the achievement of this will require major transitions in the energy sector, involve a substantial reduction in fossil fuel use, widespread electrification, improved energy efficiency, and use of alternative fuels. Reflecting this, the EU Renewable Energy Directive (EU/2023/2413) raised the binding renewable energy target for 2030 to a minimum of 42.5%, with an aspiration to reach 45%. For context, this represents an almost doubling of the existing share of renewable energy in the EU in the remaining short years to 2030.

Ireland's Climate Action and Low Carbon Development (Amendment) Act 2021, (the Climate Act), commenced on 7 September 2021. The Climate Act places on a statutory basis "the National Climate Objective"; that "the State shall, so as to reduce the extent of further global warming, pursue and achieve, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy". The Climate Act provides for a 51% reduction in greenhouse gases in Ireland by 2030 compared to 2018 levels. The Climate Action Plan (CAP) is the roadmap of Government actions to achieve national climate objectives, aligning the legally binding economy-wide carbon budgets and sectoral emissions thresholds. The most recent CAP 2025 prescribes a major programme of change with a planned increase in the proportion of renewable electricity to up to 80% by 2030, and a target of 8 GW from solar by 2030. Noting that the programme for large-scale offshore wind deployment is not expected to be realised towards the end of the decade, CAP stresses that deployment rates for onshore renewables will need to increase to match demand growth to ensure we keep electricity emissions within range of the carbon budgets. These legally binding European and national targets emphasise the pronounced need for solar farm projects of the nature proposed.

Request for Further Information Response

As set out in the submitted planning application, the purpose of the proposed development is to transport the electricity generated at the permitted Ballyloo, Park and Ballybannon Solar Farms to the national electricity grid via the existing 220/110kV Kellis substation. The substation and grid connection has been designed in accordance with best practice industry standards, incorporating innovative industry technologies to achieve optimum environmental conditions. The substation and grid connection has been assessed in cumulative terms as part of each of the solar farm planning applications, including by the Commission as part of the Ballyloo solar farm appeal. In all cases the wider project has been considered to be acceptable in terms of both environmental impact and local, regional and national planning policy. The points raised in the Commission issued Request for Further Information relate principally to the temporary construction management phase of the project, as well as some other points of detail. The relevant clarifications have been provided as part of the submitted response. It has been demonstrated that the construction phase will not result in any significant effects on the local environment, including designated Natura 2000 sites. The construction phase will be managed in a proactive and safe manner locally, and in full accordance with all identified environmental management commitments. All associated measures will be discussed and agreed with Carlow County Council prior to commencement of development.

Elsewhere, it has been demonstrated through the response that the proposed development will not result in any adverse landscape and visual impacts. The site is accessible and traffic access during the construction phase will be managed in close consultation with the Area Engineer's Office and local residents. The design has proactively considered the management of surface water drainage and includes focused design measures. All construction (and decommissioning) works will be carried out according to best practice with environmental controls in place to prevent any damaging run-off from the site.

Based on the foregoing, we trust that the submitted material is sufficient to allow for the appropriate and positive determination of the subject application.



If you have any queries, please do not hesitate in contacting us.

Yours Sincerely

A handwritten signature in black ink, reading 'Conor Frehill'.

Conor Frehill

HW Planning