

The Secretary
An Coimisiún Pleanála
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26th March 2026

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Re: An Coimisiún Pleanála Reference ABP- 323860-25: Application under section 182A of the Planning and Development Acts (as amended) by Ballyloo Solar Farm Limited for the approval by An Coimisiún Pleanála for a period of 10 years for development at Ballyloo, Castletown, Graiguenaspiddoge, Kellistown East, Kellistown West, Kilballyhue, Knockbower, Leagh Or Ballybeg, Linkardstown and Moyle Big (townlands), County Carlow. The proposed development comprises of 1) A 220kV Air Insulated Switchgear (AIS) or Gas Insulated Switchgear (GIS) electricity substation or a 110kV AIS electricity substation, including two control buildings, associated electrical structures and apparatus, lightning protection, telecom pole, perimeter security fencing, security lighting, water and drainage infrastructure, temporary construction compound to connect to and serve solar farms; 2) Associated grid connection between the proposed substation and the existing 110/220kV Kellis substation comprising 220kV or 110kV underground electricity cables (reflecting final substation option) of c.8.9 km or c. 8.65 km in length to be provided in an excavated trench including associated fibre cable and ducting, and all associated site development and reinstatement works. Two options are proposed after the first c.8.3 km of underground grid connection and for the final c.0.35 – 0.6 km of the underground cable grid connection route comprising (i) cabling in the L30535 public road, or (ii) cabling in private agricultural land; 3) Temporary construction and permanent operational access to the substation from the L3050, vehicular entrance and access track from this public road; 4) All ancillary site development, excavation, construction, landscaping and reinstatement works; 5) The development subject to this application forms part of grid connection and access arrangements which will facilitate the connection of the permitted Ballyloo Solar Farm (Carlow County Council Reference 24/60043 / An Coimisiún Pleanála Reference ABP-322347-25), permitted Park Solar Farm (Carlow County Council Reference 24/60205), and proposed Ballybannon Solar Farm (Carlow County Council Reference 25/60137) to the national electricity grid via the existing 110/220kV Kellis substation. A Natura Impact Statement (NIS) has been prepared in respect of the proposed development. The NIS includes consideration of the permitted Ballyloo and Park Solar Farms and the proposed Ballybannon Solar Farm which are located in County Carlow.

Dear Sir/ Madam

We act on behalf of Ballyloo Solar Farm Limited, applicants in the above matter. Further to recent correspondence, we welcome the opportunity to comment on the shared observations on the application from the following parties:

- Carlow County Council;
- Transport Infrastructure Ireland (TII);
- Uisce Éireann;
- Department of Housing, Local Government and Heritage;
- HSE;
- Local community members (2 no. in total).

This response is structured as follows to address the observations of three grouped stakeholders:

1. Carlow County Council;
2. Prescribed Bodies;
3. Community Members (Third Parties).

There are a number of cross cutting themes in the community observations related to nature of development, landscape, construction management and some other matters. On that basis, a decision has been taken to respond to these submissions made on a topic-based basis.

01. Carlow County Council

PRINCIPLE OF DEVELOPMENT

The submission on behalf of Carlow County Council confirms their acceptance in relation to the principle of the proposed development at the subject location, and that they consider the proposed development to amount to supporting infrastructure for the consented solar farms in the area “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 Council include a general statement that the development needs to be coordinated with the adjoining permitted developments so as to minimise any potential for negative impacts on local amenities, especially where different requirements have been stipulated in the permitted developments to the current proposal. We understand the reference to “adjoining permitted developments” to mean the permitted Ballyloo¹, Park² and Ballybannon³ Solar Farms, that the subject substation will service to transport electricity generated to the national transmission network. The Commission will note that a ‘one-project’ approach has been taken to the design and assessment of these projects through the different prepared applications, inclusive of the proposed substation and grid connection. Having regard to this approach, there are no differing requirements related to these permitted solar farms and the proposed development. The potential for cumulative construction and operational impacts has been considered in detail, with no significant effects identified. The Applicant

¹ Permission was granted by An Coimisiún Pleanála on the 5th September 2025.

² Permission was granted by Carlow County Council on the 24th April 2025.

³ Permission was granted by Carlow Council on the 31st October 2025.

is committed to constructing and operating the collective project in a sustainable manner, to ensure no negative impacts on local residential amenities.

LANDSCAPE AND VISUAL

The Council's submission confirms their view that the proposed substation and grid connection is not located in an high value or sensitive landscape character area. They confirm the area "has a class 3 moderate sensitivity designation" with "the capacity to absorb most types of development subject to the implementation of mitigation". They further confirm that "the site is not located within the scope of any scenic views or routes".

They include a list of "conditions which may be appropriate". Within this, they include a general statement that additional landscaping measures be implemented around the perimeter of the substation compound, in order to soften and absorb the overall visual impact. There is no context provided for this statement, including assessment of any impact (perceived or otherwise) on local receptors. There is some 32 linear meters of new hedgerow proposed and 15 linear meters of bolstered hedgerow within the project red-line boundary. The application is accompanied by 3 no. landscape mitigation plans by Macro Works, reflecting the three substation options that may be implemented. The LVIA confirms that there will be no material visibility resulting in landscape or visual impacts in the local environment. On that basis, we respectfully submit that the proposed landscape mitigation for the proposed development is wholly appropriate and does not need to be supplemented further.

Overall, it is objectively concluded that the proposed development will not generate significant landscape or visual impacts on surrounding receptors, rather the proposed design approach will ensure it is successfully assimilated into the local landscape.

ENGINEERING COMMENTS

The Council report references comment from the Municipal District Engineer, but no specific report from that party is provided. Instead, there is a general statement attributed about "a lack of details as to how the site will be connected with Kellistown" substation and that the applicant should be required to provide options for connection to the substation. A full design of the grid connection route to the substation is enclosed in the SID application and it is not clear from the comment if this has been reviewed by the officer in question. As presented in the plans, the grid connection includes two options to complete the connection into the Kellistown substation via local road substation entrance and via adjoining private lands. Again, no Council comment is offered on this optionality. The proposed grid connection has been developed further to direct engagement with EirGrid and has been designed by suitably qualified electrical engineers to full industry guidelines and standards.

OTHER SUGGESTED CONDITIONS

The Council's submission identifies some other conditions that may be appropriate:

- **Archaeology:** That the recommendations of the submitted Archaeological Impact Assessment should be considered. The Applicant is happy for the recommendations to be adhered to.

- **Traffic Management / Construction Environment Management Plan:** That a traffic management coordinator be appointed to coordinate construction timelines and road openings to prevent prolonged impacts locally. The Applicant has made a commitment to preparing and agreeing a Traffic Management Plan as part of the final contractor prepared Construction and Environment Management Plan, which will deliver on these requirements. The CEMP will include focused surface water management measures.
- **Road Condition:** The Council also requests pre and post construction road survey, as a basis to determine any need for reinstatement works. The Applicant has committed to this as part of the prepared Site Access Report.
- **Protection of Water Services:** That existing water services infrastructure be protected. The submitted Construction Method Statement provides for this, inclusive of prescribed method for under and over crossings of any water services infrastructure in the local area.
- **Natura Impact Statement:** That all mitigation measures in the prepared NIS be adhered to and implemented by means of a qualified Ecological Clerk of Works. This commitment has been made in the application and will be adhered to.
- **Development Levies / Bonds:** That these should be agreed with the local authority ahead of construction. Based on a review of the Carlow County Council Development Contributions Scheme 2025-2029, we note that substations / underground grid connections are not a class of development that is identified as being liable for contributions. We note that general development contributions have not been levied for another substation in the local area, reference ABP-313139-22 refers. Once constructed, the substation itself will function as a permanent node on the national transmission network. As such, there is no requirement for bond of insurance for reinstatement of the substation site. The Applicant is happy to provide standard security related to satisfactory reinstatement of the public road as part of normal construction works. As is common practice, the form and amount of any such security can be agreed with the planning authority prior to commencement of development, or with the Commission in default of agreement.

02. Prescribed Bodies

UISCE ÉIREANN

We note the observation from Uisce Eireann dated 12th February 2026 on the file, which confirms they have no objection in principle to the proposed development. This correspondence confirms that the applicant has engaged with their Diversions Department and have obtained a Confirmation of Feasibility letter for all build over / near works associated with the proposed development. This verifies that the design of the proposed development has been validated through engagement with Uisce Eireann. As noted, the applicant is committed to obtaining a follow-on Diversion Agreement to execute any grant of planning permission.

HSE

The submission by the HSE dated 9th January has been reviewed and it confirms presented project information and assessment findings. The structure of the report is to reference aspects of the

proposed development, as submitted, and underline the need to adhere to certain criteria. Based on the key matters raised, the Applicant is happy to confirm that:

- All stated requirements related to the set up and functioning of the temporary construction compound will be adhered to. This includes best practice measures related to the protection of groundwater from runoff. A final CEMP will be prepared, inclusive of all stated requirements.
- In relation to potential noise impact, the recommended construction hours are already stipulated within the submitted application documentation. We welcome the acknowledgement that operational noise is not expected to result in any impacts in the local environment. The findings of the submitted Noise Impact Assessment have been corroborated.

TRANSPORT INFRASTRUCTURE IRELAND

The submission by Transport Infrastructure Ireland (TII), dated 6th January 2026, acknowledges that the grants of permission for Ballyloo, Park and Ballybannon solar farms included conditions specifically for the protection and maintenance of the safe and efficient operation of the local national roads network, including agreement of associated measures as part of an updated construction and environment management plan. No objection to the proposed development is raised. The Applicant acknowledges the importance of the N80 as an interregional route on the national roads network and are fully committed to continued engagement with TII on associated project interactions. We welcome TII's acknowledgement that the proposed HDD crossing of the N80 incorporates their previous feedback on the solar farm applications in the area, including the Park Solar Farm (Carlow Council Reference 24/60205) which also requires a crossing of road infrastructure for which TII are the responsible authority. The TII submission concludes with suggested conditions to be attached to any grant of permission related to, inter alia, the submission and agreement of construction method statements with TII, as well construction traffic management plan. The Applicant can confirm in the case of the development subject to this SID application that it will reference all stipulated requirements in the final CTMP and will consult with TII, and other parties where necessary, prior to the commencement of development. The construction of underground cabling elements will have regard to the Department of Transport published Interim Guidance to Road Authorities (Version 2), effective from March 2026. We note again that on the Park Solar Farm, this detail was considered acceptable by TII who on review of same advised no objection to the proposed development.

DEPARTMENT OF HOUSING, LOCAL GOVERNMENT AND HERITAGE

The Department of Housing, Local Government and Heritage (DoHLGH) has made its observation on the proposed development in respect of archaeology. Having regard to previous engagement with the National Monuments Service and the archaeological assessment completed for the Ballyloo solar farm, a suite of mitigation measures were put forward previously and agreed. The DoHLGH recommend the inclusion of conditions to any grant of permission related to pre-commencement testing. Specifically, it states that pre-development testing should occur at greenfield sections of the development not previously assessed. The Applicant is happy to adhere to this, as per its own recommendations in the submitted Archaeological, Architectural and Cultural Heritage Impact Assessment.

Having regard to the above, the applicant can confirm their acceptance of the proposed conditions by DoHLGH. We request that these be formalised under any decision to grant planning permission. As outlined, it has been demonstrated as part of the submitted reporting that an appropriately worded planning condition will alleviate any archaeological concerns on the site whilst simultaneously facilitating a positive and timely decision.

03. Community Members

There are two submissions from local residents on the public file, namely from Karina Moody and Paul Rooney. For context, Karina Moody lives 159 metres from the proposed substation site. Paul Rooney dwelling house is c.385 metres from the existing 110/220kV Kellis substation. As such, there is no above ground component of the project that will be visible from his property at operational phase.

PERCIEVED UNCERTAINTY IN PROJECT DESIGN

It is submitted in the observation by Paul Rooney that there is excessive uncertainty related to the proposed development. He has a fundamental objection that the application includes design flexibility. This point is also raised in one sentence in the Karina Moody submission. We respectfully submit that there is no uncertainty related to the project as proposed. The application is made pursuant to An Coimisiún Pleanála's opinion under section 287B of the Planning and Development Act 2000 (as amended) and the statutory process allows for the presentation and assessment of flexible design elements to be confirmed. The details unconfirmed in this application are clearly defined on the application and include the voltage and corresponding switchgear of the substation, the voltage and corresponding specification of the underground cable grid connection, and the route of the final c.0.35-0.6 km section of the underground cable grid connection to the existing 110/220kV Kellis substation. The range of parameters under which the design fall are specified clearly in the statutory notices, defined in planning drawings, and assessed across the different environmental discipline reports. The approach is common for certain infrastructure of the subject nature, as underlined by the presence of the legislation allowing same itself.

Mr. Rooney states generally that the approach undermines the Aarhus Convention, but he does not elaborate on this claim in any way. All project information has been made available at the offices of Carlow County Council and An Coimisiún Pleanála, as well as digitally online via the project website. All statutory notification processes have been adhered to and Mr. Rooney's ability to participate and make representation on the application has not been inhibited in any way.

PERCIEVED PROJECT SPLITTING

Paul Rooney submits that advancing the application for the subject substation / grid connection distinct from the solar farms constitutes 'project splitting' and should not be supported. This is not substantiated. The requirement for a 'dual consent' process for such development is well established in the planning system and the Commission will note that statutory provisions necessitated that the applicant make a separate application for the substation / grid connection separate from the solar farms in the area. The context behind the making of this separate SID application is explained in the submitted Planning and Environmental Statement for the subject application. It was also explained in the Planning and Environmental Statement for the solar farm applications. The Commission will also

note, that in making the separate applications, a robust 'one-project' approach was adopted by the design team in the presentation and assessment of the separate solar farm and substation / grid connection components. There are no procedural issues with the approach taken and all statutory provisions have been adhered to. This is fully consistent with legislative provisions and established precedent for An Coimisiún Pleanála's assessment of SID applications distinct from Section 34 applications for renewable energy generation made directly to Cork County Council in this case.

ENVIRONMENTAL IMPACT ASSESSMENT

Paul Rooney's claim that project splitting is occurring is also based on his claim that no single Environmental Impact Assessment Report (EIAR) has been undertaken. There is no EIAR for the proposed development and it is not clear to the reader if Mr. Rooney has reviewed the EIA Screening document which accompanies the application. The description and characteristics of the project as described in the EIA Screening cover the substation and grid connection, alongside the Ballyloo, Park and Ballybannon solar farms. As established in the submitted EIA Screening, Part 1 and Part 2 of Schedule 5 of the Regulations defines the categories and thresholds of development that require EIA. The proposed development, as well as solar farm projects are not of a type identified in Part 1 of Schedule 5, nor does it meet any prescribed thresholds for mandatory EIA under Part 2. Based on the information provided in accordance with Annex IIA and Annex III of the 2014 Directive, it has also been objectively demonstrated that a sub-threshold EIA is not required for the proposed development, as adequate measures are in place to avoid, reduce or mitigate likely impacts, such that neither the construction nor operational, nor decommissioning phases of the overall development will have a significant negative impact on the environment. The application is accompanied by focused technical reports across various disciplines which confirm no significant environmental impacts, findings which are reflected in this EIA Screening.

ECOLOGY & BIODIVERSITY

Paul Rooney submits that the underground cable route will cross streams and drains with hydrological connectivity to the River Barrow and River Nore SAC. He makes a general statement that connectivity equates to risk to qualifying interests of Natura 2000 sites. There is no detailed review or critical commentary on the submitted Natura Impact Statement (NIS). The NIS confirms clearly that proposed development site has potential hydrological connectivity to the River Barrow and River Nore SAC and potential for significant effects during the project construction phase cannot be discounted without the implementation of best practice construction and operational design and control measures. The NIS has considered the relevant qualifying interests indicated as having a potential impact-receptor pathway and identified best practice measures to ensure that potential pollutant sources are not released from the proposed development to the receiving environment such that there will be no risk of adverse effects on these Qualifying Features. The assessment is scientific in nature and objectively concludes that the proposed development will not adversely affect the integrity of any Natura 2000 sites. There is no reasonable doubt in relation to this conclusion.

It is submitted in the observation by Paul Rooney that the proposed development will damage hedgerows, fragment and weaken ecological connectivity and that the application lacks a comprehensive inventory of hedgerow loss and commitments on like-for-like replacement planting. In addition to offsetting carbon emissions and facilitating green renewable energy, it has been clearly demonstrated that the proposed solar farms and enabling substation / grid connection will result in

significant biodiversity benefits in the local area. The proposed substation / grid connection is component part of the permitted Ballyloo and Park Solar Farms, as well as the proposed Ballybannon Solar Farm. All three applications include focused Biodiversity Management Plans which were prepared as an integral part of these planning applications. These BMPs have been tailored to reflect local ecological survey work completed, contributing positively to the protection and enhancement of the local ecosystems around the solar farm sites. These include specific management techniques like planting native wildflowers, creating pollinator habitats, and installing bat and bird boxes to support biodiversity, while also addressing potential impacts on existing habitats and species. These plans are underpinned landscape and maintenance management schedules for ongoing monitoring towards the achievement of biodiversity goals commensurate with the provision of a clean form of renewable energy.

A clear inventory of hedgerow removal and planting is provided in the application (replicated again for the solar farms below). This confirms that areas of small localized hedgerow removal will be offset by considerable landscaping planting in support of the principle of biodiversity gain across the local area.

Project	Hedgerow Removal	Planting
Ballyloo Solar Farm	47 linear metres	3,523 new linear metres of hedgerow. 13,425 linear metres of bolstered hedgerow. 2,611sqm native woodland.
Park Solar Farm	37 linear metres	392 new linear metres of hedgerow. 3,841 linear metres of bolstered hedgerow. 24,512sqm native woodland.
Ballybannon Solar Farm	240 linear metres ⁴	441 new linear metres of hedgerow. 7,100 linear metres of bolstered hedgerow. 9,188 sqm of native woodland.
Total	324 linear metres	4,356 new linear metres of hedgerow. 25,983 linear metres of bolstered hedgerow. 36,311 sqm of native woodland.

The proposed development provides for the removal c.30 linear metres of hedgerow at the substation site entrance and c.1 linear metre removed and reinstated under proposed Option A (if advanced) where the cable alignment passes through a field boundary near the Kellis 220kV sub. There is some 32 linear meters of new hedgerow proposed and 15 linear meters of bolstered hedgerow within the

⁴ 180 metres of this relates to the removal of hedgerow to facilitate a sightline, as requested by Carlow County Council.

project red-line boundary. The application is accompanied by 3 no. landscape mitigation plans by Macro Works, reflecting the three substation options that may be implemented.

CONSTRUCTION MANAGEMENT

Both the Paul Rooney and Karina Moody observations raise general concerns in relation to construction activities, including road disruptions. Ms. Rooney expresses concerns that construction works could be undertaken on Sundays in certain circumstances. The proposed hours of construction activities are set out clearly in the application and prescribe that work will only be conducted in normal working hours of Monday to Friday 08:00 to 18:00 and Saturday 08:00 to 13:00, with no works on Sundays or Bank Holidays except in exceptional circumstances or in the event of an emergency. As is standard practice, the local planning authority will be advised of the need for any such works, which are not envisaged and would be an extremely rare occurrence. The construction phase will include the appointment of a dedicated community liaison person for the construction phase who will work closely with the community to communicate on all aspects related to the temporary construction phase.

Mr Rooney's observation claims the proposed underground cabling works in the road are contrary to the Carlow County Development Plan 2022-2028. This is not justified with reference to any policies in the plan in question. As per the submitted Ballyloo Substation & Grid Connection - Construction Methodology, cable will be laid in defined 100m lengths at any one time and single lane closure Stop/Go systems can be implemented for the slit trenches on all the roads. It is acknowledged, that subject to consenting, procurement and commercial implementation timelines, that the proposed development may be construction alongside other projects in the local area. This will be proactively managed with the local planning authority and local community throughout the temporary construction phase.

The planning application is supported by a comprehensive set of impact assessment reports which set out in detail the potential for impacts during both the construction and operational phases of development. These reports also include substantial mitigation, where necessary, to ensure that any potential impacts are either not realised or reduced to acceptable levels. In addition to these individual reports, the final contractor prepared Construction Environmental Management Plan (CEMP) will ensure that all potential construction phase environmental impacts will be addressed in accordance with current legislative requirements and best practice guidelines.

HEALTH AND SAFETY

Both of the observers raise concerns related to potential health and safety effects. Karina Moody references construction noise specifically and nighttime noise levels. There is no intended construction works at night outside of normal construction hours. As part of the final CEMP, a noise management plan will be prepared which will ensure that there is no exceedance of relevant British Standards Codes of practices such as: BS 5228-1: 1997 "Noise Control on Construction and Open Sites -Part 1"; BS 5228:2009 and AI:2014 "Code of practice for noise and vibration control on construction and open sites". The submitted Noise Impact Assessment confirms there will be no negative nighttime operational noise impacts on local receptors.

The submission by Paul Rooney highlights that there may be fire risks from the substations and fire suppression measures may be needed, as well as an emergency response plan. The 110/220kV Kellis substation west of Mr. Rooney's property is an existing substation operated by EirGrid, the state authority for the transmission network. All substation assets are designed and certified to their standards, utilising approved plant and equipment only. The correct design, construction and commissioning by suitably competent and experienced personnel, in accordance with cross disciplinary technical standards and best practice guidance ensures the potential for fire is minimised. EirGrid have adopted emergency response policies and plans in place for all substation facilities as part of standard operating procedures.

PROPERTY VALUES

It is submitted in the observation by Karina Moody that the proposed development may lead to devaluation of her property. Reference is made to a property in Meath which has been for sale for an extended period. No detail is provided to evidence the claim and the Applicant is not aware of any cases where provision of a substation/ grid connection as part of wider solar farm as given rise to a reduction in the value of a dwelling in real terms. In the subject case, the proposed substation is bordered to the north and west by the permitted Ballyloo solar farm.

The SEAI, Ireland's national sustainable energy authority, has commissioned independent research which confirmed no evidence that proximity to ground-mounted solar farms has a negative impact on property prices. This report which examined studies on property prices in the United States, United Kingdom, and Germany, where ground-mounted solar PV systems are more prevalent than in Ireland states " this research has identified no studies from the case study countries which indicate that proximity to USSPV (utility scale solar PV) negatively impacts on property prices". The SEAI are a state body under the Department of Climate, Energy and the Environment and the research prepared is independent and impartial.

OTHER MATTERS

It is submitted by Karina Moody that the proposed substation will result in visual impacts from her property owing to its location. We respectfully note that there is some confusion in her statement in relation to the term 'consented mitigation', which she says she has not approved.

The layout of the proposed substation / grid connection has considered proximity to existing residential properties in full. The proposed substation is an inland development, set back from public roads and residential properties. The nearest third party dwellings to the substation compound area are approximately 152 metres to the west, 160 metres to the north, and 259 metres away to the east. The application includes representative photomontage viewpoints from these locations which present the different substation options. VP1 (north) and VP2 (east) confirm no material visibility of any of the substation options from these properties.

The reference to 'consented mitigation' in the application relates to permitted hedgerow planting under the approved Ballyloo Solar Farm, which is adjacent to the proposed substation site. The Landscape and Visual Impact has been prepared in accordance with best practice methodologies prescribed in the Environmental Protection Agency (EPA) publication 'Guidelines on the Information to be contained in Environmental Impact Statements (2022) and the accompanying Advice Notes on

Current Practice in the Preparation of Environmental Impact Statements (2015), and Landscape Institute and the Institute of Environmental Management and Assessment publication entitled Guidelines for Landscape and Visual Impact Assessment (2013).

It is noted also that Karina Moody has raised concern in relation to a lack of community benefits. Generally, a community benefit fund for a solar farm is considered once a grid connection has been secured from EirGrid and the route to market process for the commercial sale of electricity from the solar farm has been completed. The options for this route to market are typically either government-supported frameworks like the Renewable Electricity Support Scheme (RESS) or Corporate Power Purchase Agreements (CPPAs) which are signed with large energy users. Depending on the nature of the commercial route to market, this will dictate the approach to community benefit funds.

The submission by Paul Rooney claims the local environment is environmentally sensitive and not an appropriate location for the proposed development. This is not supported by any focused commentary supporting this position. The full suite of environmental assessments completed for the project, inclusive of survey work, have confirmed that the site is an appropriate location for the proposed development and there is no potential for significant effects.

Finally, it is submitted in the observation by Paul Rooney that the proposed development conflicts with objectives in the Carlow County Development Plan. In making this claim, we note that he does not reference any specific objectives in the plan. The submitted Planning and Environmental Statement includes a detailed summary of national, regional and local planning policy that the proposed development complies with. Carlow County Council have not identified any conflicts with the operative development plan, rather they have noted that it will contribute positively to a number of important objectives.

04. Conclusions

We welcome the opportunity afforded by An Coimisiún Pleanála to comment on the observations on this application. Based on a review of the comments contained therein, we respectfully consider that the observations do not raise any substantive issues which would preclude a grant of planning permission for the proposed development. It has been robustly demonstrated that the proposed substation and grid connection is compatible with national, regional and local planning policy. It has been demonstrated that the proposed substation / grid connection will not give rise to any adverse visual effects in the local environment in what is a highly anthropogenic landscape. Elsewhere, there will be no significant ecology, noise or archaeology impacts arising from the construction or operational phase of the substation / grid connection.

Carlow County Council have confirmed their acceptance of the proposed development at the subject location. They consider the proposed development to amount to supporting infrastructure for the consented solar farms in the area “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”. They have acknowledged that there is no landscape sensitivity in the local area or other policies that would inhibit development. None of the prescribed bodies who observed on the application raise objections. Instead they recommend a number of conditions to be applied to any grant of permission,

the majority of which relate to environmental commitments already made in the application documentation.

We respectfully submit that none of the community observations raise any material issues that would warrant a refusal of planning permission on this case. All of the principal points have been responded in full as part of this response. All environmental assessments completed for the project have been prepared in accordance with best practice with all assessment guidelines met. There are no material health and safety implications arising from the proposed development. As noted, all construction phase activities will be proactively managed in accordance with a traffic management plan which will be agreed with Carlow County Council. Commitments are in place to mitigate the potential for any impacts on local residents.

We are in the midst of climate and energy crisis as reflected in the significant scaling up of renewable energy targets and implementation in recent years under REPowerEU and RED III. The challenge is substantial, and the response requires strong leadership and immediate intervention. Should Ireland fail to achieve its climate and renewable energy targets, we are directly contributing to the rise in temperatures predicated by IPCC and to the global threat that this rise will impose on future generations. This scenario is very likely, if not definitive, and Ireland is set to fail to achieve its 2030 targets, having already failed to achieve its 2020 targets.

The delivery of renewable energy projects must be prioritised. The Board must consider its obligations under Regulation (EU) 2022/2577 and RED III to prioritise renewable energy projects and exercise its evaluative judgement and any discretionary powers in a manner consistent with the Climate Action Plan as required by Section 15 of the Climate Act. This is particularly relevant to Ballyloo, Park and Ballybannon solar farms and its associated substation and grid connection, where it has been demonstrated that the proposed development is located in an area where there is available grid capacity and the solar farm can output comparably higher electricity due to its siting in an area of high irradiance. The wider solar farm project can avoid the attrition rates which result in 40% of projects not progressing beyond planning and into construction/operation phases of development. The benefits of this in terms of wider 'post -planning' development viability in the context of grid connections and route to market should not be underestimated. There is a shortage of available grid capacity in Ireland and renewable energy projects with viable grid connections need to be prioritized as per statutory obligations.

Based on the foregoing, we respectfully request that An Coimisiún Pleanála grant planning permission for the proposed substation and associated underground grid connection infrastructure.

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

Yours sincerely



Conor Frehill
HW Planning