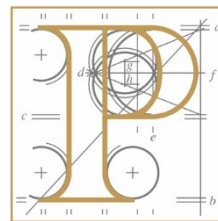


Our Case Number: ACP-323860-25

Your Reference: Ballyloo Solar Farm Limited



An
Coimisiún
Pleanála

Conor Frehill
HW Planning
5 Joyce House
Ballingcollig
Co. Cork

Date: 22 July 2026

Re: 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.

Dear Sir / Madam,

I have been asked by An Coimisiún Pleanála to refer further to the above mentioned proposed development which is before the Commission for consideration.

Please be advised that the Commission, in accordance with section 182A(5)(a) of the Planning and Development Act 2000, as amended, hereby requires you to furnish the following further information in relation to the effects on the environment of the proposed development:

1. 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:

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- (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.
- (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.
- (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.
- (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).
- (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.

- (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.
- (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 an 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.
- (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.

2. 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.
3. 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.
4. 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.

5. 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.
6. 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.
7. 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.
8. 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.
9. 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.
10. 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.
11. 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.

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

The three landscape mitigation plans do reference 'Landscaping consented as part of the consented Ballyloo Solar farm', which lies outside of the red 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 enures to the benefit of land and not the applicant. In addition, the verified photomontages submitted with the application and the impact assessment set out in the LVIA are reliant on the landscaping scheme permitted as part of the Ballyloo Solar farm permission. Should a circumstance arise that the proposed substation and the permitted Ballyloo solar farm were not to proceed together as one project, it may be proved difficult or impossible to give effect to landscaping that is outside of the boundaries of the development proposed in this application, notwithstanding that it is to be carried out within the blue lined area identified on the location maps that form part of this application.

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

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

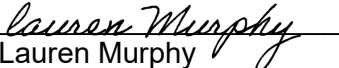
The further information referred to above should be received by the Commission within **4 weeks** from the date of this notice (i.e. no later than the **19th August 2026**).

In this regard, please submit 1 hard copies and 1 electronic copy of the above information.

Please note that following its examination of any information lodged in response to this request for additional information, the Commission will then decide whether or not to invoke its powers under section 182A(8)(a) of the Planning and Development Act 2000, as amended, requiring you to publish notice of the furnishing of any additional information and to allow for inspection or purchase of same and the making of further written submissions in relation to same to the Commission.

If you have any queries in the meantime, please contact the undersigned officer of the Commission or email sids@pleanala.ie quoting the above mentioned An Coimisiún Pleanála reference number in any correspondence with the Commission.

Yours faithfully,


Lauren Murphy
Executive Officer
Direct Line: 01-8737275

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