Jennifer Doyle and Rita Aroua
Seantir
Kellistown West
Carlow

20th October 2026

Ref: Planning Application: ACP-323860-25
Proposed Ballyloo Electricity Substation and Associated Underground Grid Connection Developer: Ballyloo Solar Farm Limited
Development Address: Townlands of Ballyloo, Castletown, Graiguenaspiddoge, Kellistown East, Kellistown West, Kilballyhue, Knockbower, Leagh or Ballybeg, Linkardstown and Moyle Big, County Carlow

Dear Sir/Madam

We, Jennifer Doyle, Aoife Doyle and Rita Aroua of Seantir, Kellistown West, Carlow, hereby submit a formal planning observation in relation to Planning Application ACP-323860-25.

1.0 Incomplete information

Fundamentally we request that the applicant decides on the following information as it is impossible to fully assess the project without the following information being specified - the voltage (whether it will be 110kv or 220kv, corresponding specification of the underground cable grid connection and route of the final 0.35-0.6km section of underground grid connection to the existing 110/22kv Kellis substation. Whilst these options have been discussed in the proposal the applicant should commit to one option for planning consideration.

2.0 Environmental concerns

"Any potential effects on ecology as a result of the proposed development are confined to the construction phase, which will be relatively short in duration (approximately 2 years)" (Applicant's Planning and Environmental Report, p43)

The applicant has focused on the area for the substation in its focus of the environmental report. I would argue that the full area required for the construction should be considered and request that a full Environmental Impact assessment is carried out for all areas considered in the proposal.

The applicant is not aware of any wildlife living in or using the ditches that are contained within the roads required for underground cabling. The extensive (up to 8km) of proposed underground cabling area has not been surveyed so the applicant has no knowledge of the level of wildlife involved in the proposed area.

We have personally experienced badgers, foxes, vole, field mice, rabbits, buzzards, hedgehogs, bats, birds, shrews on the L7148. In our garden, alongside the common garden birds, we have witnessed Curlew, rabbits, butterflies, humming bird moth, an owl, bats, two squirrels, rats, shrews, vole, numerous birds including sparrow hawk, woodpecker and frogs. These are all likely to traverse the local area.

Much of the biodiversity in the area is minute - insects, small animals and flora, which have not been included in the proposer's study, but are vital to the local ecosystems. Removing nutrient-rich topsoil strips away essential organic matter, nitrogen, phosphorus, and carbon storage capacity. Earthworms, beneficial microbes, and insects lose their habitat, drastically reducing biological activity and the soil's ability to filter and buffer water .Heavy machinery used for digging increases bulk density and ruins natural soil structure. None of these things have been considered in the prepared environmental report.

Any proposed development should be sensitive to existing wildlife and be non-intrusive to the natural surroundings and ecosystems of the area. I question whether a development of this scale which will take away the existing agricultural land and habitats can ever be considered non-intrusive during either the construction phase or after commencement with construction noise, disturbance to habitats and food sources. The current inter-connected network of farmland, open spaces, rivers, wildlife habitats will be forever changed by the addition of another sub station to the locality.

Any lasting impact on the local environments can only be considered when you have examined the local environment affected. The area affected is Townlands of Ballyloo, Castletown, Graiguenaspiddoge, Kellistown East, Kellistown West, Kilballyhue, Knockbower, Leagh or Ballybeg, Linkardstown and Moyle Big, County Carlow, so I request that

a full Environmental Impact Statement is carried out before planning is granted.

3. Extended periods of road works and local impact

The distance between my house and the N80 is approximately 2.85km. The size and shape of the local L7148 road does not lend itself easily to passing vehicles at the best of times, so it likely that the underground cabling works would require this road to be fully closed. Road closures in the area will cause major disruption to households in the local area trying to access the main road network. An idea of the traffic management plan should be drawn up to let households know how long roads would need to be closed for and allow for plans to be made for people to access their houses/land.

Carlow County Development Plan Chapter 9 describes the aim to "Protect, conserve and enhance the character, quality, and value of the County's landscape, in conjunction with recognition and support for the role of green infrastructure as a natural resource in the landscape, capable of delivering a wide range of environmental and quality of life benefits, including climate change adaptation."

The Central lowlands are defined by being primarily rural in character. Substantially changing the rural character of the area and ease of amenity of the area. The rural nature of the full area of development is a key part of the identity of the locals who live here, and the industrialization of the area will detrimentally alter this character. Global Food Security has never been as important, and I do not believe this is the time to change the zoned agricultural land in a small rural area to Industrial.

The full development area ranges from level 2 to 4 on the landscape sensitivity scale. I request that a full Landscape and Visual Impact Assessment is carried out on the full area of development which would give a full overview of the real sensitivity of the substantial development in this area.

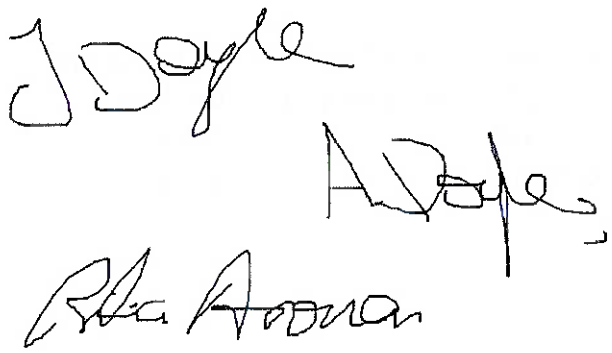
4. Application splitting (Implications of the development for proper planning and sustainability)

This should be considered the fourth application for this development. Ballyloo solar farms, Ballybannion solar farm, Park solar farm and now the substation are all part of the same development. This appears to be a practice of Project Splitting to deliberately avoid proper planning and the requirement for an EiA/EIS. It is essential that all aspects are cumulatively assessed to fully acknowledge the overall scale of the area being developed because they are not operating independently. Looking at the overall project on a map it is easy to see how the local environment will be detrimentally affected by the addition of these solar farms and conversion from their use as agricultural land. Again I think we should be encouraging the use of the land as food sources and not changing the nature of the land to industrial.

5. **Conclusion**

We wish to make it clear that we are not against progress or renewable energy in practice, but are very concerned about the scale of this project as a whole and its overall impact in Carlow. We are fully committed to protecting as much of the environment as we possibly can, encourage biodiversity in our garden and adjacent green areas beside our house, have solar panels on our house and drive electric vehicles. We have however, major concerns about the industrialization of rural Carlow and damage to local habitation and wildlife. I would urge An Coimisiún Pleanála to reject this application to protect the rural environments of Carlow.

Regards,



Jennifer Doyle, Aoife Doyle and Rita Aroua