



COMHAIRLE CONTAE  
CHEATHARLACH

CARLOW COUNTY COUNCIL

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Bóthar Átha Í,  
Ceatharlach, R93E7R7

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4<sup>th</sup> March 2026.

**Ms. Lauren Murphy,  
Executive Officer,  
An Coimisiún Pleanála,  
64, Marlborough Street,  
Dublin, 1.**

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<b>Re:</b>	<b>ACP-323860-25</b>
<b>Description of Development:</b>	<b>Permission for a 220kV AIS/220kV GIS Substation or a 110kV electricity substation, associated 220kV or 110kV underground grid connection and ancillary works.</b>
<b>Location of Development:</b>	<b>In the townlands of Ballyloo, Knockbower, Linkardstown, Kilballyhue, Graiguenaspiddoge, Castletown, Moyle Big, Leigh or Ballybeg, Kellistown West and Kellistown East, County Carlow.</b>
<b>Applicant:</b>	<b>Ballyloo Solar Farm Ltd.</b>

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Dear Lauren,

Please see attached, response to your letter dated 19<sup>th</sup> February 2026 in connection with the above.

Yours sincerely,

**Eoin Maddock  
A/Administrative Officer  
Planning Department.**



**CARLOW COUNTY COUNCIL**  
**PLANNING DEPARTMENT**

**C A R L O W**  
**C O U N T Y C O U N C I L**  
COMHAIRLE CHONTAE CHEATHARIDUCHA



**Planning Report 1**

**ABP Reg. Ref.**

ACP – 323860 – 25

**Name of Applicant**

Ballyloo Solar Farm Limited

**Address of Development**

In the townlands of Ballyloo, Castletown, Graiguenaspiddoge, Kellistown East, Kellistown West, Kilballyhue, Knockbower, Leagh or Ballybeg, Linkardstown and Moyle Big (townlands), Co. Carlow.

**Type of Development**

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.
<b>Type of Permission</b>	Permission
<b>Date of Site Inspection</b>	08/01/2026

## Context

The following observations and commentary are made in respect of a Section 182A application to An Coimisiún Pleanála for Strategic Infrastructure Development ('SID') consent for a 220kV Air Insulated Switchgear (AIS) or Gas Insulated Switchgear (GIS) electricity substation or a 110kV AIS electricity substation and all associated works.

In summary the proposed 110kV electrical substation will consist 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.

The proposed development will transport the electricity generated at the permitted Ballyloo 1 and Park 2 Solar Farms, and the proposed Ballybannon 3 Solar Farm to the national electricity grid via the existing 220/110kV Kellis substation. The substation will connect to the existing 220/110 kV Kellis substation via a proposed 110kV or 220kV underground grid connection cable. The overall length of the grid connection is approximately 8.9km at its longest.

The applicant proposed design flexibility for the following development:

1. The substation will be either 110kV or 220kV voltage. The 110kV substation will use Air Insulated Switchgear (AIS) switchgear, whilst the 220kV substation might use AIS or Gas Insulated Switchgear (GIS) depending on the requirements of EirGrid.
2. The underground cable grid connection from the proposed substation to the existing 110/220kV Kellis substation will be at either 110kV or 220kV voltage.
3. The underground cable grid connection is located primarily in the public road network. However, there are two options proposed for its final entry into the existing 220/110kV Kellis substation.

- (a) Option A is to leave the L30535 local road and enter onto private lands where it will cross agricultural farmland into the existing 220/110kV Kellis substation.
- (b) Option B is to be situated within the L30535 local road which provides road access into the existing 220/110kV Kellis substation.

It is noted that the options described above apply to both the 110kV and 220kV underground grid connection cables.

The Proposed Development is indicated to be critical infrastructure that will be intrinsically linked to permitted renewable energy projects. These renewable energy projects cannot function as standalone developments as they are reliant on connections to the Proposed Development in order to connect to the national grid.

### **Planning Authority view in relation to the decision to be made by the Board**

- Having regard to the permitted development namely; 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), the Planning Authority considers this current proposed development amounts to supporting infrastructure for the consented Solar PV development by way of an amended substation 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 Planning Authority would have concerns that the development be appropriately co-ordinated with adjoining permitted and significant developments, so as to minimise any negative impacts to residential amenities in the area, particularly where different requirements have been stipulated in the permitted developments to the current proposal.
- Given the scale of the permitted development and other similar type developments permitted in the wider area, the cumulative impact of the proposed works and adjoining permitted development on the local road network should be considered. The application should demonstrate that the proposal will not affect or alter any local drainage systems or rivers or adjacent properties and that the underground cables will not affect the drainage of the locally classed public roads.

### **Site Location**

- Nearest settlement to the Kellistown Substation site is Rathoe Village circa 1.2km to the south-east, with Tullow being circa 5km to the north-east.
- The route travels east from the proposed substation on the L3050, before turning north onto the L30504. It then crosses the N80 at Castletown Crossroads and continues east on the L7148, before turning south onto the L3053. The cable would then turn east onto the L30535, which is the main road access to the existing 220/110kV Kellis substation. There are two options proposed for the final c .0.35-0.6km section accessing the substation. One option (Option A) is within privately owned agricultural lands and the other option (Option B) is via the L30535 local road. In the case of Option A, c. 1m of hedgerow will be temporarily removed for the purposes of laying the cable into the substation lands, which will be reinstated.
- The site is rural in character, consisting of existing agricultural land (mainly arable crop), with clusters of one-off rural dwelling development. The topography of the area is relatively flat to low rolling landscape.
- The site is located within the Central Lowlands Landscape Character Area, as designated in the Carlow County Development Plan 2022-2028. Within this character area, the site lies within the 'farmed lowlands' landscape character type, which has a class 3 moderate sensitivity designation. This LCA has the capacity to absorb most types of development subject to the implementation of appropriate mitigation measures.

- There are 3 no. designated sites located within the catchment area of the application site, comprising the River Barrow and River Nore SAC (3.9km), the River Slaney SAC (4.6km), the Blackstairs Mountain SAC (14.1km). The grid connection route crosses the Kilmeany stream, which is a tributary of the Burren Riven, a tributary of the River Barrow and is therefore hydrologically connected to the River Barrow and River Nore SAC.
- The application site incorporates the location of a number of Recorded Monuments and is within the zone of influence of a number of Recorded Monuments. An Archaeological Impact Assessment (AIA) has been carried out and forms part of the planning particulars, the recommendations of the Assessment should be considered in the assessment of this application.

### 3) Internal Reports

This application was referred on 04/12/2025 to the following, reports received are attached with this submission and are as indicated below.

- Municipal District Engineer

Report received on 04/12/2025 from P. Harrington, (Tullow Area Engineer) which outlines a number of observations, including a lack of detail as to how the site will be connected with Kellistown. He also observes that the road access to the substation is saturated with different groups seeking access. It is recommended that the applicant be required to provide options for connections to the substation, to include overground options.

- Transportation Department

Roads - No report received at the time of writing.

- Environment Section

Report received on 02/01/2026 from D. Lynch (Senior Executive Engineer), which raises no objection to the proposed development subject to condition.

### Relevant Development Plan provisions relating to the subject site and surrounding area

<i>Carlow County Development Plan 2022 – 2028 (CDP)</i>	
Chapter 4	Enterprise and Employment
Chapter 6	Infrastructure and Environmental Management
Chapter 9	Landscape and Green Infrastructure.
Chapter 10	Natural and Built Heritage, including (inter alia) European and National Designated Natural Heritage Sites, Archaeological Heritage, and The Record of Protected Structures.
Chapter 16	Development Management Standards.

#### Chapter 4 – Enterprise and Employment

##### *Section 4.4.4 - Placemaking and Sustainable Design*

**PM. P4:** It is the policy of the Council to;

*‘Support the development of industries that create and employ green technologies and encourage the uptake of measures to facilitate the transition towards a low carbon economy and circular economy.’*

#### Chapter 7 – Climate Action and Energy

##### *Section 7.10.3.2 - Solar Energy*

*‘No commercial scale solar projects are in operation within County Carlow. However, there are a number of solar developments permitted with a total export capacity of c. 29.49 MW.’*

*There are currently no national guidelines in place to guide the location or scale of solar farms. Constraints may arise in relation to landscape impacts, protection of natural heritage or archaeology, or in relation to protecting the high value agricultural land suitable for tillage.*

*The County RES maps the potential availability of solar resources. The mapping exercise was carried out applying a risk-based approach to suitability for solar farms. The risk level is defined by adding up the risk levels at certain distances from material assets, sensitive receptors, European Sites and from natural physical attributes (such as groundwater vulnerability, geological heritage sites, soil drainage, landslide, and flooding susceptibility). The summed risk levels are displayed on a scale ranging from High (maximum risk) to Low (minimum risk). However, the presence of a risk category in and of itself does not support nor preclude solar development; it is a tool which flags areas of having a higher or lower concentration/distance from various sensitive receptors.*

*A proposed solar development would be subject to detailed siting and environmental considerations, and the outcomes of the planning process. The risk mapping suggests that the northern part of the County has a higher potential for solar farms.'*

### **Climate Action – Policies**

**CA P2:** Support the transition of the County to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050, by way of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency.

### **Renewable Energy – Policies**

**RE. P1:** Encourage and facilitate the production of energy from renewable sources, such as from wind, solar, bioenergy, hydroelectricity, and geothermal, subject to compliance with proper planning and environmental considerations.

### **Solar Energy Policy**

**SE. P2:** Favourably consider the development of solar farms on agricultural lands which allow for farm diversification and multipurpose land use.

### **Solar Energy Objectives**

**SE. O1:** Increase the penetration of solar energy developments at appropriate locations subject to compliance with proper planning and environmental considerations.

**SE. O2:** Promote the integration of solar energy into existing and planned developments.

**Volume 2b Appendix VI of the Carlow County Development Plan 2022-2028 contains the Carlow County Renewable Energy Strategy.**

Section 6.2 of the strategy outlines policy in relation to Solar Energy developments. Table 6-9 outlines the objectives and supporting policies in relation to solar energy over the short (1-2 years) an, medium 2-6 years) and long term (6-10 years).

Name	Description	Short-term	Medium-term	Long-term
<b>Objective S1</b>	Increase the penetration of commercial scale solar energy development in appropriate locations.	✓	✓	✓
<b>Policy S1.1</b>	To favourably consider the redevelopment of brown field sites for large solar PV projects.	✓	✓	✓
<b>Policy S1.2</b>	To favourably consider the development of solar farms on agricultural lands which allow for farm diversification and multipurpose land use.		✓	✓
<b>Objective S2</b>	To promote the integration of solar energy into existing and planned developments.	✓	✓	✓
<b>Policy S2.1</b>	To encourage the use of solar thermal or solar PV installations as part of the design and planning process for new developments and refurbishments.	✓	✓	✓
<b>Policy S2.2</b>	To promote and facilitate the use of solar technology across County Carlow including schools, public offices and for infrastructure, e.g. traffic lights, streetlights, road information signage etc.	✓	✓	✓

**Volume 2b Appendix VII of the Carlow County Development Plan 2022-2028, contains the Carlow County Landscape Character Assessment & Schedule of Protected Views**

The site is located inside the ‘Central Lowlands’ landscape character area. This area is deemed moderately sensitive to development. It has the capacity to absorb most types of development subject to the implementation of appropriate mitigation measures. The application site is located within the farmed lowland landscape type and has a landscape sensitivity of 2-3.

Additionally, the site is not located within scope of any scenic views or routes.

LCA Policy Objective (Central Lowlands): Conservation, restoration and enhancement of the existing landscape character area. New development to maintain integrity of landscape character area through careful location, siting and design.

Chapter 9 of the Carlow County Development Plan 2022-2028 relates to Landscape and Green Infrastructure. The following policies are noted:

**LA P1:** Protect and maintain the overall integrity of the County’s landscape, by recognising its capacity to sustainably integrate and absorb appropriate development, and by ensuring that development protects, retains and, where necessary, enhances the appearance and character of the landscape, and does not unduly damage or detract from those features which contribute to its value, character, distinctiveness and sensitivity e.g. landform, habitats, scenic quality, settlement pattern, historic heritage, amenity, land use and tranquillity.

**LA P2:** Ensure that development will not have a disproportionate landscape or visual impact in sensitive upland areas of the County (due to siting, layout, design or excessive scale, height and bulk) and will not significantly interfere with or detract from scenic upland vistas, when viewed from the surrounding environment, including nearby areas, scenic views and routes, and from settlements.

**LA P6:**

Require all developments, having regard to their landscape setting, to be appropriate in siting, layout, design and scale, in order to ensure any potential adverse or landscape and visual impacts are minimised and/or removed where necessary, and that natural site features and characteristics are retained and maintained.

**LA P8:**

Require, where appropriate, Landscape/Visual Impact Assessments to be prepared by suitably qualified professionals, for development proposals which may have significant landscape or visual impacts, and/or which are located within or adjacent to sensitive landscapes.

**Conditions which may be appropriate**

The Planning Authority considers that should An Coimisiún Pleanála be mindful to grant planning permission for this Strategic Infrastructure Development, that suitable conditions should be attached to any grant of permission that require;

- 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.
- The appointment of a traffic management coordinator to liaise with similar adjoining developments and to co-ordinate construction timelines and road openings to prevent prolonged and negative impacts to road users.
- Pre and post road surveys and reinstatement costs to maintain the structural integrity of the public road network in respect of the underground grid connection installation works. Any resulting damage must be repaired to the Council's satisfaction and all costs borne by the applicant.
- Provide details for protection measures for existing water service infrastructure in the area during the grid connection works.
- A detailed Construction Environmental Management Plan and a detailed Surface Water Management Plan.
- All mitigation measures outlined in the submitted Natura Impact Statement to be carried out in full and implemented by the developer under the supervision of a suitability qualified Ecological Clerk of Works.
- Development levies and bond to be agreed with the Local Authority prior to commencement.

Signed: 

**Senior Executive Planner**

Date: 03/03/26

