Outlook

## Re: ACP-323988-26

**From** Conor Cochrane <Conor.cochrane@neo-env.com>
**Date** Tue 5/5/2026 2:42 PM
**To** SIDS <sids@pleanala.ie>
**Cc** Rachel Buchanan <rachel.buchanan@res-group.com>; Edel Burke <edel.burke@res-group.com>; Colleen Patterson <Colleen.patterson@neo-env.com>

1 attachment (529 KB)
FINAL Colehill SID Applicant Response to 3rd party objection.pdf;



Dear Alba,

Further to the below - please find attached observation on behalf of the applicant in response to the objection lodged as well as comments in respect of the Offlay County Council Report.

I would be grateful if you could confirm receipt.

Many thanks
Conor

Kind Regards,

Conor Cochrane
Bsc Msc MRTPI MIPI
Associate
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Ballymena Office
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**From:** SIDS <sids@pleanala.ie>
**Sent:** 07 April 2026 12:29
**To:** Colleen Patterson <Colleen.patterson@neo-env.com>
**Subject:** ACP-323988-26



Dear Sir/Madam,

Please find attached a letter, and relevant documents, relating to case ACP-323988-26.

A hard copy of the letter and documentation is in the post.

Kind Regards,
Alba

# Applicant Response

## Colehill 110kV Substation (Strategic Infrastructure Development)

ACP Case Number: ACP-323988

05/05/2026

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**Prepared For:**

Ballyteige Solar Ltd

**Prepared By:**

Conor Cochrane BSc (Hons) MSc. MRTPI MIPI

| | Name | Date |
|---|---|---|
| Edited By: | Andrew Mitchell | 05/05/2026 |
| Checked By: | Conor Cochrane | 05/05/2026 |
| | **Name** | **Signature** |
| Approved By | Helena McDonnell | |

# Background

1.1. Following receipt of the application and completion of the statutory public consultation process, it is understood that third party submissions / observations were received by the Commission, including from Offaly County Council and a local resident. The Commission has acknowledged receipt of these submissions and has invited the applicant to respond to the issues raised. This observation therefore considers the third-party representations in detail in order to assist ACP in its determination of the Strategic Infrastructure Development (SID).

1.2. In summary, the matters raised in the third-party submissions broadly relate to issues of residential amenity, environmental protection, water infrastructure, traffic and access, cumulative effects, and the adequacy of the assessment submitted with the application. These are material planning considerations and are addressed in detail in this report with reference (where appropriate) to the documentation submitted as part of the application.

1.3. Accordingly, this response demonstrates that the proposed development has been subject to comprehensive assessment, that the potential impacts have been appropriately identified and mitigated, and that the proposal remains consistent with the proper planning and sustainable development of the area.

# Introduction

1.4. This observation has been submitted on behalf of Ballyteige Solar Limited 'The Applicant' in respect of the third-party representations submitted in respect of the proposedColehill 110kV substation and grid route.

1.5. The proposed development for which permission under Section 182A is being sought constitutes the following: A permanent 110kV Air Insulted Switchgear Substation consisting of:

- 1 No. Compound (c.8733m2) consisting of; 3 No. work areas, CCTV, associated drainage enclosed in 2.6m high palisade fencing and gates;
- 1 No. Eirgrid control building (c.440.15m2), 110kV bay arrangement, 4 No. lightning poles, compound road; o Crane hardstand, 2 No. transformers and 2 No. auxiliary transformers, 110kV electrical equipment and back-up generator:
- 2 No. Independent Power Purchaser (IPP) control buildings (total 147.3m2) and compound including toilet;
- 2No. grid code compliance equipment, 2No. harmonic filters, car parking and telecoms pole)
- Remaining associated infrastructure consists of:
- perimeter fencing;
- Access tracks (upgraded, existing and new);
- Temporary construction compound and tracks o Temporary and permanent road re alignment of a section of Wood of O local road;
- c. 7.5km of underground 110kV cabling with joint bays on access track and local roads with associated horizontal directional drilling; and
- c. 610m of medium voltage underground cabling trenching with associated horizontal directional drilling.
- All associated and ancillary site development, excavation, construction, landscaping and reinstatement works and the provision of site drainage.

1.6. The site of the proposed development has a total area of 11.02 hectares. This application is a new 110kV Substation to connect into the existing Thornsberry Substation. The Substation is to facilitate the Ballyteige Solar Farm (PA Ref:2198), and the Derrygrogan Solar Farm (PA Ref:22378 and ABP 318041-23).

### Submission by Yasmin Esani

1.7. This submission is structured across 7 principal grounds, each of which raises concerns relating to residential amenity, environmental protection, infrastructure and procedural adequacy. The key issues are summarised below in planning terms.

### Proximity to Residential Dwellings

1.8. The submission raises concerns regarding both the proximity of the proposed 110kV substation to the objector's dwelling and the potential for the Proposed Development to contribute to the industrialisation of the rural landscape. The applicant does not agree with this characterisation.

1.9. It is noted that the submission appears to conflate the underground grid connection route with the substation itself. While the underground cable route passes in closer proximity to the dwelling, this element of the Proposed Development will be entirely underground and will not give rise to any visual or landscape effects. The proposed substation, which forms the only above-ground infrastructure of note, is located approximately 3.37 km to the south-east of the objector's dwelling, representing a substantial separation distance.

1.10. The objector's dwelling is located approximately 1.3 km east of the N52, on the eastern edge of Tullamore, within a rural–peri-urban context. The surrounding landscape is influenced by a combination of agricultural land use, established road infrastructure, dispersed residential development and built form associated with the wider town. As such, the receiving environment as categorised in the Offlay CDP as a 'Rural Area Under Strong Urban Influence' does not comprise a remote or highly sensitive rural landscape, but rather one that is already subject to a degree of human influence and change.

1.11. Notwithstanding this context, it is noted that the proposed substation, which represents the only above-ground element of the Proposed Development with potential for visibility, is located approximately 3.37 km to the east of the objector's dwelling. This represents a substantial separation distance, such that the Proposed Development would not be a prominent or defining feature within the objector's visual environment. This is examined in further detail in the LVIA (TA3) particularly in relation to viewpoint 6 (p49 of LVIA) which considers views south from the local road L-1025. In summary the LVIA considers that the value of this view is considered to be low reflecting its typical rural character and limited scenic amenity or qualities. Furthermore, sensitivity is assessed as Medium. In conclusion, The Proposed 110kV substation and associated grid route will result in no visual change and visual effects will be 'not significant from this viewpoint.

1.12. The site is located within an area identified in the Offaly County Development Plan as Low Landscape Sensitivity. Such landscapes are described as robust and capable of accommodating development, including energy infrastructure, subject to appropriate siting and design. They are typically characterised by agricultural land uses and strong field boundary patterns, particularly mature hedgerows, which provide a high degree of enclosure and natural screening.

1.13. In this context, and having regard to the established landscape structure, the Proposed Development would be readily absorbed within the receiving environment and would not be inconsistent with the character or capacity of the landscape.

1.14. At this separation distance, and having regard to the comparable elevation of the site (c.71.7–77.8 m AOD) and the objector's dwelling (c.72 m AOD), together with the intervening pattern of agricultural fields, mature hedgerows and treelines, the potential for direct views of the substation is limited and, where available, likely to be filtered and intermittent. As such, the Proposed Development would not give rise to significant effects on residential amenity. As stated above and having regard to the most representative viewpoint at this location, viewpoint 6 on the L1025 has restricted rural views and the substation is fully screened and not visible. The view has low value and medium sensitivity and will be no visual change and effects are not significant.

1.15. The Proposed Development is limited in scale and extent, comprising a compact substation and associated infrastructure. It does not represent continuous or expansive built form, nor does it introduce urbanising features such as street patterns, building clusters or suburban form. The associated solar development is similarly contained within defined field parcels and retains the underlying agricultural land use.

1.16. Furthermore, the pattern of development is dispersed rather than consolidated, and is visually moderated by the existing landscape structure. As a result, the development would be perceived as a contained and site-specific intervention, rather than as part of a wider process of landscape industrialisation.

1.17. Accordingly, having regard to the separation distance, intervening screening, landscape capacity and the contained nature of the development, the Proposed Development would not give rise to significant effects on residential amenity, nor would it result in the industrialisation of the countryside.

1.18. Matters relating to potential impacts on property value do not constitute material planning considerations.

1.19. Noise The objection in relation to noise is misguided. The assertion that no noise impact assessment has been provided is inaccurate. A detailed Acoustic Impact Assessment accompanies the application as Technical Appendix 8 of Volume 3. This assessment has been prepared by suitably qualified acoustic specialists and evaluates both construction, operational and cumulative noise effects using established methodologies.

1.20. The assessment explicitly considers the nature of substation noise, including the potential for tonal characteristics such as transformer hum. The assessments confirms that sources of sound during the construction period are temporary and will vary both in location and duration. Sound will arise through the operation of large items of plant and due to traffic movements entering and travelling on the site itself. Further details of the activities during the construction period are provided in the Outline Construction Environmental Management Plan (OCEMP) and Construction Traffic Management Plan (CTMP).

1.21. In terms of findings, the predicted operational noise levels are low. The maximum predicted level at nearby receptors is 32 dB LAeq, with a corresponding rating level of 34 dB. These levels are below the relevant WHO guideline thresholds of 50 dB during the daytime and 45 dB at night, with substantial margins of compliance. Importantly, cumulative effects with nearby solar developments are included and predicted noise levels remain within acceptable limits.

1.22. Overall, the evidence demonstrates that the proposed development will not give rise to significant noise effects. The objection appears to rely on generalised concerns regarding substations rather than the specific, assessed characteristics of this proposal and therefore overstates the likely impact.

### Electromagnetic fields and safety concerns

1.23. The objection raises concerns regarding potential health and safety implications associated with electromagnetic fields generated by high voltage infrastructure. Reference is made to international guidance suggesting that substations should be located away from residential properties where practicable. It is asserted that the application does not adequately assess risks associated with EMF exposure or demonstrate appropriate separation distances from dwellings.

1.24. It should be noted that the infrastructure proposed including both the substation and grid infrastructure generate low levels of electromagnetic fields (EMF). Exposure to low-level electromagnetic fields has been studied extensively and there is no evidence that it is harmful to human health, according to the World Health Organization (WHO). In fact, the WHO notes that most scientists and doctors agree that if any health effects exist from low-level electromagnetic fields, they are likely to be very small compared to other health risks that people face in daily life.

1.25. Furthermore, the inclusion of a sheath in the underground cables means that the underground cables do not produce external electric fields. The magnetic fields of the

underground cables fall more rapidly with distance. The typical magnetic flux densities at 5m from underground cables in Ireland are 0.5µT for a 110kV cable, in which is much lower than a hair dryer at 30cm from use (7µT). Transmission 110kV substations produce small fields with the maximum values generally occurring where the line(s) and/or cable(s) enter and exit the substation. Typical values are similar to the underground cables values.

1.26. No conclusive evidence has been found to date proving that electric and magnetic fields are harmful as stated in Eirgrid guidelines *'Information on Electric and Magnetic Fields'*[1]. In 1998, ICNIRP (International Commission on Non-Ionising Radiation Protection) issued guidelines for exposure to time varying EMF (up to 300GHz) which included power frequency exposure limits. These guidelines were adopted by the EU in 1999 and EirGrid fully comply with these gridlines. The substation and grid route is designed to be compliance with the EirGrid design requirements.

## Risk to local water supply and hydrogeological impacts

1.27. A central concern relates to the potential impact on a shared local mains water supply serving a number of rural dwellings. The objector contends that the proposed underground cabling works, including horizontal directional drilling in specific locations, and the construction compound introduce a risk of contamination or disruption to groundwater sources. It is stated that no hydrogeological assessment, water supply impact assessment or contingency measures have been provided, and that the absence of such information represents a significant deficiency.

1.28. The objector raises concern in relation to potential impacts on a shared local water supply and underlying groundwater arising from the proposed cabling works including trenching and horizontal directional drilling. It is asserted that the absence of a hydrogeological or water supply assessment represents a deficiency.

### Receiving environment and waterbody context

1.29. The application has considered the hydrological and hydrogeological context of the site in detail. The proposed development is located within the Lower Shannon catchment and more specifically within the Tullamore River sub catchment. The local receiving surface water environment is centred on the Tullamore_030 waterbody with downstream connectivity to the Clodiagh and Brosna systems before ultimately discharging to the River Shannon. These downstream waterbodies are substantially larger systems with increasing catchment areas and flow volumes which reduces any theoretical sensitivity to localised works.

1.30. In relation to groundwater the site is underlain by the Geashill and Tullamore groundwater bodies. These are extensive regional scale groundwater units which cover large geographical areas and are not dependent on localised recharge conditions within the site. The Proposed Application Site and eastern part of the Grid Route are mapped to be underlain by the Lucan

[1] Eirgrid EMF A5 brochure 4:Layout 1

Formation which is described as dark limestone and shale ("Calp"). The western part of the Grid Route is mapped to be underlain by the Visean Limestones (undifferentiated) described as undifferentiated limestone (www.gsi.ie). The Lucan Formation is classified as Locally Important Aquifer. The central part of the Grid Route is also underlain by Locally Important Gravel Aquifer.

1.31. It is also noted that there are no public water supply sources or group water schemes located within the immediate vicinity of the proposed development and no mapped source protection areas directly affected by the works. While all groundwater is treated as a resource under the Water Framework Directive there is no identified receptor in proximity to the works that would be susceptible to the type of impacts suggested by the objector.

1.32. As set out in the Natura Impact Statement and Flood Risk Assessment / Drainage Impact Assessment the potential for impact has been assessed through a source pathway receptor framework. This is the standard approach to determining whether a development can give rise to environmental effects. While construction activities can represent a theoretical source the assessment confirms that there is no viable pathway linking those activities to a sensitive groundwater receptor.

1.33. The proposed works are shallow and localised and do not extend into deeper groundwater bearing strata. There is a clear separation between the zone of excavation and the principal groundwater resource. There is no abstraction from groundwater no discharge to groundwater and no requirement for dewatering. As such there is no mechanism by which groundwater flow or levels could be altered.

1.34. In the absence of a direct or indirect pathway the potential for impact on groundwater quality or quantity is not realised. This is a key finding as it demonstrates that the concern raised is not supported by the physical characteristics of the site or the nature of the proposed works.

### Construction phase risk and mitigation

1.35. The Grid Route will have a potential Horizontal Directional Drilling (HDD) two crossing points at Tullamore_030. Due to the close proximity of local waterbody to the works, there is a potential for surface water quality impacts during trench excavation work due to runoff from the road surface.

1.36. This runoff may contain elevated concentrations of suspended sediment, cementitious runoff and/or hydrocarbons. Some minor groundwater/surface water seepages will likely occur in trench excavations, and this will create additional volumes of water to be treated by the runoff management system. Inflows will likely require management and treatment to reduce suspended sediments.

1.37. Proposed substation works are located in close proximity to the Tullamore_030 river waterbody. Construction activities at the Application site only have the potential for short term effects due to the minor and transient nature of the works. This limits the potential for the Proposed Development to alter the overall status of a Surface Water Body. A comprehensive suite of mitigation measures is embedded within the project design and

construction approach. The Outline Construction Environmental Plan provides a detailed framework for pollution prevention including the use of bunded storage for fuels and chemicals designated refuelling areas strict handling procedures and the availability of spill response equipment at all times. Plant and machinery will be regularly inspected and maintained to prevent leaks, and all works will be supervised to ensure compliance with environmental controls.

### Potential Groundwater Quality / Quantity Effects

1.38. The Proposed Development is located over the Geashill and Tullamore Groundwater Water Bodies (GWBs). Accidental spillage during refuelling of construction plant with petroleum hydrocarbons is a major pollution risk to groundwater. The accumulation of small spills of fuels and lubricants during routine plant use can also be a pollution risk. Chemicals such as cement-based compounds also pose a threat to the groundwater environment.

1.39. Runoff from concrete works can impact on groundwater quality. Release of effluent from site welfare wastewater treatment systems has the potential to impact on groundwater and surface waters. These sources of contamination have the potential to impact on groundwater quality in the underlying groundwater body. However, due to the shallow, short-term and transient nature of the Proposed Development works, there is no potential for any significant effects during earthworks and excavation works on the GWBs.

1.40. Furthermore, the scale of the proposed works in comparison to the scale of the underlying GWBs limits the potential for effects to the overall Water Framework Directive (WFD) status of the Geashill and Tullamore GWBs (note that these GWBs cover an area of ~269 km2 and ~184 km2 respectively).

### Mitigation Measures for Pollution Prevention

1.41. Suitable protection for watercourses potentially affected by the works will be installed prior to relevant works proceeding. These measures will be in-line with Environmental Protection Agency (EPA) Pollution Prevention Guidelines. Protection measures will include:

- Plant and equipment will be stored on dedicated hardstandings within the construction compound. This will minimise the risk of pollution caused by leakages occurring out of hours. Drip trays will be used where appropriate.
- Plant and equipment will be regularly checked to ensure their correct operation and verify no leakages.
- All plant and equipment will utilise biodegradable hydraulic oil.
- Spill kits will be readily available to all personnel. The spill kits will be of an appropriate size and type for the materials held on site.

- Diesel fuel will be stored in a bunded diesel bowser which will be located within a fenced off area in the construction compound.
- Refuelling and maintenance of vehicles and plant will take place in designated areas of hardstanding.
- All other chemicals will be stored in a secure area with an accompanying COSHH Datasheet.
- Wastewater from the temporary staff toilets and washing facilities will be discharged to sealed containment systems and disposed via licensed contractors.

Mitigation Measures for Storage of Fuels and Chemicals

- As per Best Practice Guidance (BPGCS005)2, all fuels, oils and chemicals on site will have a secondary containment system of 110% capacity and be located more than 20m from any watercourse (i.e. outside of the watercourse buffer).
- A bunded diesel bowser will be located inside a fenced off area within the temporary construction compound.
- Any other chemicals will be stored within a storage container with an accompanying Control of Substances Hazardous to Health ("COSHH") Datasheet in accordance with health and safety regulations.
- If generators are used on site, these shall be bunded (the bund shall be capable of containing 110% of the fuel tank's capacity).
- The bund shall be kept empty of water.
- Where chemicals are required on site, they must be placed in an appropriate bund to prevent ground contamination. All chemicals must be stored in a correctly marked container clearly identifying the contents. Where labels are worn off, they must have a new label placed on them or the contents transferred to a correctly marked container.
- All safety data sheets for all chemicals should be filed on site as per CEMP.
- Spill kits will be on site and, for ease of access, located in the site office. Contingency plans will be in place for dealing with a spillage should a spillage occur.

### Mitigation Measures for Refuelling

1.42. During construction fuel and oil deliveries shall take place within the designated refuelling area within the temporary construction compound, the location of this area falls outside the watercourse buffers (discussed subsequently). The Contractor shall supervise site deliveries to ensure that the correct amount of material is delivered to the correct tank and the level is checked prior to refilling to avoid spillage.

1.43. Where refuelling of vehicles on site is necessary, the following guidelines will be strictly adhered to:

- Mobile plant will be filled in a designated area, on an impermeable surface well away from any drains or watercourses;
- A spill kit will be stored (and clearly marked) near refuelling areas;
- A bunded tank / bowser will be used with capacity of the bund to be 110% of the fuel storage capacity;
- Vehicles will never be left unattended during refuelling and drip trays should be located under all static plant vehicles;
- Hoses and valves will be checked regularly for signs of wear, and will be turned off and securely locked when not in use;
- Vehicles will not be left running unnecessarily and low emission fuels will be used where possible; and
- Diesel pumps and similar equipment will be checked regularly and any accumulated oil removed for appropriate disposal.

### Mitigation Measures for Excavation and Earthworks

1.44. All excavation and earthworks will be carried out in accordance with BS6031:2009 Code of Practice for Earthworks.3 Soil handling, extraction and management will be undertaken with regard to best practice guidelines such as Guidance on the Waste Management (Management of Waste from the Extractive Industries) Regulations 2012.4

1.45. The following practices will be followed in relation to the excavation of cable trenches, topsoil stripping and any other earthworks:

- Any excavated material will be stored and re-used to infill excavations. Where the soil is to be re-used, this will be side-casted. All side-casted soil to be kept a minimum of 20m from any watercourse.

- Although unlikely, if any contaminated earth is uncovered, this will be stored separately and disposed of accordingly once the contaminant has been identified.
- Efforts will be made to ensure that water does not accumulate in excavated areas.
- All topsoil and subsoil will be stored separately, and care will be given to ensure the structure and quality of the soil is not damaged.
- The amount of exposed ground and soil stockpiles will be kept to a minimum and any stockpiles in place for an extended period of time will be allowed to re-vegetate naturally.
- Earthworks shall not occur during unsuitable weather conditions, including when soils are waterlogged or very dry.
- Any excavated soil which is not reused or dispersed across the site and shall be stored on the impermeable surface at the construction compound and covered to prevent silt runoff and dust creation.

Mitigation Measures for Horizontal Directional Drilling (HDD)

1.46. The following best-practice measures will be implemented along areas of HDD where appropriate:

- Drill entry and exit pits will be located a minimum of 10m from dry channels, with all excavated spoil also stockpiled at least 10m away to reduce the risk of runoff or sediment transport.
- Silt barriers, consisting of fencing fitted with geotextile fabric, will be constructed along the base of any spoil stockpiles and positioned on sloped ground to prevent surface water runoff.
- Filter fabric will be trenched into the ground to trap coarse particles in surface water, particularly during periods of heavy rainfall.
- The drill path will be designed to maintain a depth of at least 3m beneath the canal bed, to minimise the risk of ground fracture (frac-out) and to ensure the cable remains protected from any future re-watering or natural erosion.
- An Ecological Clerk of works will be assigned to monitor the HDD alignment during drilling activities to detect any potential frac-out or surface migration of drilling fluid. If any signs are observed, all drilling will cease immediately.

- A precautionary containment boom will be placed downslope (if applicable) to intercept any accidental spills or drilling residues.
- Any groundwater or drilling fluid extracted from the pits will be temporarily stored in baffled settlement tanks and discharged to adjacent grassed areas, avoiding direct discharge into drainage channels or the canal bed.
- Excess drilling lubricant will be tankered off-site for recycling, with a tractor and tanker on standby at the entry pit throughout operations.

Mitigation Measures for Cement Based Products

- Concrete will not be allowed to enter watercourses under any circumstances, and drainage from excavations in which concrete is being poured will not be discharged directly into existing watercourses without appropriate treatment and consent from the relevant authority. Delivery trucks, tools and equipment will be cleaned at the wheel wash facility located at the temporary site compound.
- Buffers from the site drainage ditches of 2m, as well as 10m to OPW managed watercourse, have been incorporated into the design of the Proposed Development and therefore there will be no concrete being used within the immediate vicinity of a watercourse.

Mitigation Measures for Watercourse Crossings

1.47. Run off from site roads and river crossings can contain high levels of silt, especially during the construction phase. Road drains typically drain to the local water environment so are a pathway for pollution. At all the stages of culvert construction, the contractor will be contractually bound to follow the relevant pollution prevention guidelines which will include the following mitigation measures:

- Track culvert will be pre cast and not poured in situ.
- Brushing or scraping roads to reduce dust and mud deposits, appropriately disposing of material collected;
- Excavated material should be kept well away from watercourses;
- Putting small dams or silt fencing in artificial roadside ditches to retain silt;
- Working from the bank where possible (taking steps to stabilise the bank during and after works), avoiding working in the river; and,
- Divert run-off to settlement lagoons.

Mitigation Measures for Drainage

Clean Water Diversion:

- Where feasible, clean water (e.g. water that has yet to come into contact with any disturbed construction or working areas), will be kept separate from the watershed or intercepted by the construction drainage.
- Up-gradient cut-off ditches and water diversion measures will be installed, where required, in order to intercept and divert clean water around construction compound area. These measures will be installed ahead of the main construction works. This will reduce or prevent the amount of potential silt-laden or polluted water that might require treatment.
- Clean runoff that has been diverted around an area of working should be discharged into an area of vegetation for dispersion or infiltration, in accordance with SuDS techniques.
- Sediment control measures, such as silt traps, gravel, sand bags, anchored straw bales or silt fencing might be required at the discharge point to prevent erosion at the outlet and aid dispersion of the diverted water.

Silt Control:

- Silt-laden runoff should be expected from any areas of recently exposed soil or rock. There is also potential for pollution to occur from machinery used in the construction of the Proposed Development.
- Any introduced or artificial materials required (e.g. silt fencing, straw bales, sand bags etc.) that might need to be deployed onsite, will be removed on completion of the works.
- Discharge from the silt control measures will be discharged into an area of vegetation for dispersion or infiltration, in accordance with SuDS techniques or discharged into the existing drainage network within the Application Site.

Additional Mitigation Measures:

- The contractor shall ensure that silt fences are regularly inspected and maintained during the construction phase.

- If very wet ground must be accessed during the construction process bog mats/aluminium panel tracks will be used to enable access to these areas by machinery. However, works will be scheduled to minimise access requirements during very wet periods.
- The contractor will carry out visual examinations of local watercourses from the proposed works during the construction phase to ensure that sediment is not above baseline conditions. In the unlikely event of water quality concerns, the Environmental Manager and ECoW will be consulted.
- Excavations will be left open for minimal periods to avoid acting as a conduit for surface water flows. Entry by plant equipment, machinery, vehicles, and construction personnel into watercourses or wet drainage ditches shall not be permitted. All routes used for construction traffic shall be protected against migration of soil or wastewater into watercourses.

1.48. Cabins, containers, workshops, plant, materials storage, and storage tanks shall not be located near any surface water channels.Having regard to the characteristics of the receiving environment and the nature of the proposed works it is concluded that the development will not impact on surface water or groundwater bodies.

1.49. The assessment confirms that the proposed development does not involve any abstraction of groundwater and does not result in any significant alteration to existing drainage patterns. On that basis the quantitative status of both surface water bodies and groundwater bodies will remain unchanged during both the construction and operational phases.

1.50. There is no direct discharge to any receiving waters. All surface water generated during construction and operation will be managed through controlled drainage measures and best practice construction techniques. The implementation of these measures ensures that there will be no deterioration in surface water quality.

1.51. Similarly a comprehensive suite of embedded mitigation measures is in place to protect surface water and groundwater during all phases of the development. These measures ensure that there is no pathway for contamination and that groundwater quality will remain unaffected.

1.52. On this basis it is concluded that there will be no change in the status of any surface water body or groundwater body. There will be no change in quantitative status and no change in qualitative or chemical status. All identified waterbodies will be protected from any risk of deterioration.

1.53. Accordingly, the proposed development will not result in any deterioration in the status of surface water or groundwater bodies and will not prevent any waterbody from achieving its

environmental objectives. The development will not compromise the attainment of good status or good ecological potential and will not interfere with the objectives of the wider river basin district.

1.54. The proposed development is therefore consistent with the requirements of the Water Framework Directive and accords with the proper planning and sustainable development of the area in this regard.

### Impact on wetlands, bogland and ecological habitats

1.55. The submission highlights the presence of wetland and bogland habitats within and surrounding the site, noting their ecological sensitivity and protection under European and national legislation. It is argued that the scale of ground disturbance associated with cabling and construction activities could adversely affect hydrology and habitat integrity. Concerns are also raised regarding the adequacy of the Natura Impact Statement and compliance with the requirements of the Habitats Directive.

1.56. A Fossitt habitat survey was carried out on the 9th and 10th of October 2024 as part of the ecology assessment for the Proposed Development Site and a 50m buffer around the site. This identified the primary habitat under the Proposed Development as species-poor improved agricultural grassland. No wetland or bog habitats were identified within the Application Site. The concerns raised in respect of wetland and bog habitats relate to the broader regional context rather than the receiving environment. The assertion that the Proposed Development poses a risk to bogland habitats is not supported by any identified pathway or mechanism for impacts. The submission makes reference to the adequacy of the assessment, although in the absence of evidence-based objection it is considered that in this regard the assessment remains proportionate and comprehensive.

1.57. The Natura Impact Statement (NIS) makes use of the source-pathway-receptor model to identify the potential a hydrological pathway exists between the Application Site and Charleville Wood SAC via the local drainage network. Ballyteige Little, a stream that runs parallel with the west and north facing flanks of the substation boundary area flows into the Corndarragh Stream, a tributary of the Tullamore River. This river continues to flow eventually through Charleville Wood SAC. However, the existence of a potential pathway does not in itself give rise to a likely significant effect.

1.58. Sufficient best practice and mitigation measures have been outlined in the Natura Impact Statement (Paragraphs 6.88 – 6.126. In accordance with the requirements of EU Habitats Directive and Article 6(3) Habitats Directive, both a pathway and a credible impact mechanism must be identified. The submission itself raises concerns with regards to impacts without outlining any credible mechanisms. There is a comparison to Cadamstown solar farm which was located on “Irish wetlands”, it is noted that the closest wetland site is located approximately 0.52km from the proposed substation location.

1.59. The NIS includes a Stage 1: Appropriate Assessment Screening which identifies all European Sites within the Zone of Influence of the Application Site. The mention of Special Areas of Conservation which are designated for qualifying bog habitats are outlined as Raheenmore Bog SAC and Clara Bog SAC, both of which are Ramsar Sites and designated for terrestrial habitats. These sites have been assessed fully in the NIS which states that they are all located upstream of the Application Site, therefore there is no hydrological pathway for the Proposed Development to give rise to impacts upon these SACs. Therefore, there is no pathway for impacts. As a result, these SACs have been scoped out and have not been assessed any further within this report. The NIS has therefore been completed in the absence of reasonable scientific doubt.

1.60. The Proposed Development does not involve peat excavation, drainage of wetlands, or direct alteration of watercourses. The use of horizontal directional drilling beneath the dry canal for cabling avoids disturbance to surface water features and maintains existing drainage regimes. Standard construction best practice measures, including pollution prevention and sediment control, will ensure that there is no deterioration in water quality. Given the nature, scale and location of the works, there is no realistic potential for measurable effects on downstream receptors, including Charleville Wood SAC.

1.61. The NIS has been prepared in accordance with the requirements of EU Habitats Directive. A precautionary approach was adopted at screening stage, where sites with any potential connectivity were brought forward for Stage 2 Appropriate Assessment. This approach is consistent with best practice and ensures full compliance with the requirements of Article 6(3) Habitats Directive. The assessment concludes that the Proposed Development, either alone or in-combination with other plans or projects, will not adversely affect the integrity of any European site.

1.62. The submission also makes reference to the All-Ireland Pollinator Plan regarding the impacts of solar farm infrastructure. This is cited from 'Pollinator-friendly management of Solar Farms[2]'. However, this statement is presented out of context as it is considered that this an impact associated with poor management. The guidance proceeds to outline 'how solar farms can help pollinators and biodiversity' with effective management.

1.63. In conclusion, the assertions raised in this submission are not considered relevant to this proposal. The submitted ecological reporting has appropriately assessed the Proposed Development in relation to the receiving environment and receptors with potential to be impacted, informed by survey methods. Accordingly, with respect to conservation of bog and wetland habitats in the wider landscape, they are not considered relevant to this Application.

### Removal of hedgerows, trees and woodland

1.64. The objector asserts that the development will necessitate the removal or disturbance of mature hedgerows and woodland, which are identified as important ecological corridors and landscape features. Reference is made to legislative protections for hedgerows and the

[2] Available at: chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://pollinators.ie/wp-content/uploads/2023/07/AIPP-Solar-Farms-2023-WEB.pdf

potential for conflict with seasonal restrictions. It is further argued that no detailed assessment of these impacts has been provided.

1.65. It is acknowledged that hedgerows and treeline are present within and along the boundaries of the Application Site and surrounding lands. The ecological value of these features has been provided within the supporting Ecological Impact Assessment for their potential to support species, including potential foraging and commuting habitat for faunal species such as birds, bats and small mammals. The Proposed Development has been designed to avoid and minimise impacts on these habitats wherever possible.

1.66. The design incorporates a 5m buffer from hedgerows to be retained within the proposed substation footprint and tree protection buffers based on canopy height. As a result, the substantial majority of hedgerows and treelines will be retained, ensuring the continuity of ecological corridors across the site.

1.67. The extent of hedgerow removal required to facilitate the Proposed Development is limited and highly localised, comprising approximately 133.7m to facilitate access. In addition, a small number of trees (7 No.) are identified for removal and 51.68m of tree trimming. This level of removal is minor in scale and does not represent a significant loss of linear habitat.

1.68. While not proposed for removal, there was one standalone mature ash tree within a hedgerow was identified as having Low Bat Roost potential adjacent to the Proposed Development boundary and along the proposed track. No other trees with potential roost features were identified within the Application Site.

1.69. In the event that Proposed Development necessitates the removal/trimming of the ash tree with Low Bat Roost Potential, soft felling techniques will be used, following the precautionary principle, if roost potential exists, to ensure that no cavities are cut through and branches or trunk sections with cavities are lowered carefully to the ground and left with the access hole upward-facing overnight to allow any bats potentially present to leave safely. Such works will also be overseen by a suitably qualified and experienced Ecological Clerk of Works.

1.70. All vegetation clearance will be undertaken in accordance with the provisions of the Wildlife Act 1976 (as amended). Where works are required within the bird nesting season (1 March to 31 August), pre-construction breeding bird surveys will be undertaken by a suitably qualified ecologist, and appropriate measures (including exclusion zones or timing restrictions) will be implemented where necessary. As such, no contravention of legislative requirements will arise.

1.71. Woodland habitat was recorded within the 50m ecological survey area and will not be impacted by the Proposed Development. The submission's reference to woodland 'destruction' is not relevant or representative of the baseline assessment. No areas of woodland habitat are located within the footprint of the Proposed Development, and no woodland clearance is proposed. The impacts are confined to limited sections of hedgerow and individual trees, which are common and widespread features within the agricultural landscape.

1.72. The comparison with the Cadamstown Solar Farm refusal is not considered applicable. That proposal related to a large-scale solar farm development (c. 173.3 ha), where extensive habitat removal was proposed. In relation to the size of the proposed Cadamstown Solar Farm, this would equate to a larger scale of vegetation removal. In contrast, the Proposed Development (c. 11.2 hectares) comprises a 110kV substation, access road, interconnection cables and grid route of limited footprint, with minimal and localised habitat loss. The scale, nature and extent of impacts are therefore not comparable.

1.73. The Proposed Development also incorporates a Biodiversity Management Plan (BMP) which provides for habitat enhancement measures, including the establishment of species-rich grassland, installation of bird and bat boxes and the retention and long-term management of existing hedgerows and field boundaries. These measures will enhance habitat diversity and ecological function within the site relative to the existing baseline of intensively managed grassland.

1.74. The submission has raised concerns about assessments being provided in compliance with the Offaly County Development Plan particularly having regard to CDP policies BLP-01 to BLP-08 which seek to protect and enhance Offlays natural assets of clean water, biodiversity, landscape, green infrastructure, heritage and agricultural land (see TA2 EcIA for further detail). The Proposed Development has been submitted with relevant Ecological Impact Assessment, BMP and NIS, each of these reports have been completed in accordance with appropriate legislation and guidance including the Regional Spatial and Economic Strategy and National Planning Framework to address the potential effects on the rural landscape and its natural heritage features. This has informed the design of the Proposed Development, including buffers from watercourses and the minimisation of habitat loss, along with provision of mitigation and enhancement measures to ensure compliance.

### Cumulative impact with associated solar developments

1.75. The submission asserts that the combined visibility of the Proposed Development and associated solar schemes would give rise to significant cumulative visual effects. This is not considered to be the case.

1.76. The cumulative visual assessment set out in the LVIA (Section 1.179) identifies that, while some degree of combined visibility may occur due to the proximity of developments, this is generally limited and fragmented in extent **(refer to Image One: Cumulative ZTV)**, with the majority of the study area experiencing visibility of only a single development.

1.77. Furthermore, the assessment confirms that actual visibility is moderated by the established pattern of hedgerows, intervening landform and built elements, resulting in intermittent and filtered views. As such, cumulative views do not give rise to a perception of a continuous or enclosing pattern of development.

1.78. In this context and having regard to the limited scale of the substation and grid route infrastructure the Proposed Development would not materially increase the extent or

intensity of cumulative visual effects. The cumulative visual effects are therefore localised and limited, and do not support the assertion of significant adverse effects.

### Conclusion on Cumulative Effects

1.79. It is noted that the submission asserts that a cumulative assessment has not been undertaken and that the combined effect of the Proposed Development and associated solar developments would result in a substantial transformation of the rural landscape. This is not considered to be correct as a detailed cumulative analysis has been undertaken as set out in the LVIA.

1.80. Cumulative landscape and visual effects have been assessed in detail within the LVIA, specifically under **Section 1.165 (Cumulative Landscape Effects)** and **Section 1.179 (Cumulative Visual Effects)**. These sections consider the Proposed Development in combination with other existing, consented and proposed developments within the surrounding area, including the Ballyteige Solar Farm (PA Ref: 2198) and the Derrygrogan Solar Farm (PA Ref: 22378 / ABP 318041-23), among others. This approach accords with established guidance, whereby cumulative effects are assessed on the basis of the additional cumulative change arising from the Proposed Development when considered alongside other relevant schemes, rather than through a single combined assessment.

1.81. Matters relating to the status or adequacy of separate planning applications do not preclude the assessment of the Proposed Development, which falls to be considered on its own merits.

1.82. Having regard to the low sensitivity and corresponding capacity of the receiving landscape, the dispersed arrangement of the associated solar developments and the limited and extent of combined visibility of the Proposed Development, the cumulative landscape and visual effects arising from the Proposed Development are assessed as **Not Significant**.

### Traffic, access and road infrastructure

1.83. Concerns are raised regarding the capacity of the local road network to accommodate construction traffic, particularly heavy goods vehicles and abnormal loads required for substation equipment. The objector notes the narrow and rural nature of the road network and asserts that no construction traffic management plan, road condition survey or restoration proposals have been provided. The need for temporary road realignment is cited as evidence of existing infrastructural constraints.

1.84. It is incorrect to state that no Construction Traffic Management Plan has been provided. A detailed CTMP accompanies the application and establishes a clear framework for the management of all construction related traffic, including routing, vehicle types, mitigation measures and site management procedures. In parallel, a Preliminary CTMP has been prepared for the grid connection works and confirms that a final, detailed CTMP will be developed by the appointed contractor and agreed with Offaly County Council prior to

commencement. This ensures that traffic management will be subject to further detailed oversight and approval before any works proceed.

1.85. In terms of traffic volumes and network capacity, the CTMP demonstrates that the scale of construction traffic is limited. Over the 12 - 18 month construction period, an estimated 314 HGV deliveries are anticipated, with a peak of approximately 15 HGV movements per day. These volumes are expressly identified as low and do not give rise to any significant capacity concerns on the surrounding road network. The CTMP and PCTMP further confirms that HGV movements will be mostly concentrated in the early stages of construction and will reduce thereafter with defined working hours controlling the timing of movements.

1.86. The rural and localised nature of the road network has been fully assessed as part of the route selection process. The haul route has been chosen based on its ability to accommodate the required vehicles, including abnormal loads and verified through swept path analysis of the largest anticipated vehicles. Where constraints have been identified, these have been addressed within the design. Two pinch points have been identified and appropriate measures are proposed, including temporary road widening, hedgerow removal, relocation of a telegraph pole and localised permanent improvements. These mitigations will facilitate safe passage of construction vehicles and demonstrate that the design approach responds to existing road conditions.

1.87. The CTMP confirms that both temporary and permanent realignment of a section of the local road is included within the project design. This is a standard and proportionate response to facilitate construction access and ensure safe operation, rather than evidence that the road network is incapable of accommodating the development.

1.88. The objection also incorrectly states that no road condition survey or restoration proposals have been provided. The CTMP clearly commits to undertaking pre-construction and post-construction condition survey of the affected local road network, specifically the section between the site access and its junction with the L1025. It further confirms that the developer will be responsible for repairing any damage attributable to construction traffic (if applicable).

1.89. In addition, both the CTMP and PCTMP set out a suite of mitigation and management measures to minimise any temporary disruption. These include controlled delivery scheduling, defined working hours, traffic management arrangements, signage, and procedures to manage sensitive locations and ensure safe access in and out of the site. The PCTMP specifically notes that traffic management planning will take account of local constraints such as narrow roads and will implement appropriate controls to minimise disruption.

1.90. In summary, the submitted documentation demonstrates that traffic generation is minor and the haul route is suitable and has been tested for the largest vehicles. Localised constraints have been identified and addressed through engineering measures, and reinstatement commitments are in place as set out in the proposed mitigations. The concerns raised are therefore not substantiated.

### Absence of national planning guidance and application of the precautionary principle

1.91. The submission argues that there is currently no specific national planning guidance governing large scale solar infrastructure or associated substations, including separation distances and cumulative thresholds. In this context, the objector contends that the precautionary principle should apply, particularly given the perceived deficiencies in environmental assessment and the proximity to sensitive receptors. It is suggested that, in the absence of clear policy guidance, the development should be refused or subject to an oral hearing.

1.92. The concerns raised in regards to the alleged absence of 'specific national planning guidance' in relation to large scale solar are considered to be misguided. It should be stated in the first instance, that this project does not seek consent for a solar farm therefore even if accurate – the assertion relies upon a misunderstanding of the project description which is for a substation compound, grid route and associated infrastructure.

1.93. That said, as set out in the Planning Statement the Revised National Planning Framework (NPF) represents a significant shift towards a more structured and proactive approach to renewable energy planning in Ireland, emphasizing regional coordination, infrastructure development, and community involvement to achieve national climate and energy objectives.

1.94. Key features identified in the NPF to facilitate the transition towards a low carbon energy future include:

- A shift from predominantly fossil fuels to predominantly renewable energy sources.
- Increasing efficiency and upgrades to appliances, buildings, and systems.
- Decisions around development and deployment of new technologies relating to areas such as wind, solar, smart grids, electric vehicles, buildings, ocean energy and bio energy.
- Legal and regulatory frameworks to meet demands and challenges in transitioning to a low carbon society.

1.95. Government has set ambitious targets to achieve 9 GW of onshore wind, 5 GW of offshore wind and 8 GW of solar by 2030, as well as supporting at least 500 MW of local community-based renewable energy projects and increased levels of new micro-generation and small-scale generation. Chapter 9 of the NPF 'Climate Transition and Our Environment' states that:

*"The accelerated delivery of additional renewable electricity generation is therefore essential for Ireland to meet its climate targets, reduce its greenhouse gas emissions, and improve its energy security by reducing reliance on imported fossil fuels and diversifying its electricity supply".*

1.96. The Plan also highlights the important role rural areas play in securing a sustainable renewable energy supply, as well as the role renewable energy has in being a new source of jobs and rural growth in OECD (Organisation for Economic Co-operation and Development) Countries. The various policies in this Framework are structured under National Policy Objectives (NPOs) and National Strategic Outcomes (NSOs). The key policies of relevance to this proposal are:

- NPO 30: Facilitate the development of the rural economy, in a manner consistent with the national climate objective, through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off farm activities, while at the same time noting the importance of maintaining and protecting biodiversity and the natural landscape and built heritage which are vital to rural tourism.
- NPO 70 Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050.
- NPO 71 Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.
- NPO 73 Support the co-location of renewable technologies with other supporting technologies and complementary land uses, including agriculture, amenity, forestry and opportunities to enhance biodiversity and promote heritage assets, at appropriate locations which are determined based upon the best available scientific evidence in line with EU and national legislative frameworks.
- NPO 74 requires each Each Regional Assembly to plan, through their Regional Spatial and Economic Strategy, for the delivery of the regional renewable electricity capacity allocations indicated for onshore wind and solar reflected in Table 9.1 below, and identify allocations for each of the local authorities, based on the best available scientific evidence and in accordance with legislative requirements, in order to meet the overall national target.
- NPO 75 requires Local Authorities to plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant Regional Spatial and Economic Strategy, through their City and County Development Plans.

1.97. In this context, the Proposed Development is not only consistent with national policy, but also a strategic enabler of Ireland's climate and energy goals. This approach is further supported by Climate Action Plan 2025, which requires accelerated delivery of grid infrastructure to enable renewable energy integration as reflected under section 11.2.1 which states;

*'A renewables-led system is at the core of Ireland's plan to radically reduce emissions in the electricity sector, protect our energy security, and ensure our economic competitiveness. This requires the accelerated and increased deployment of new renewable electricity generation capacity and related infrastructure'*

1.98. Furthermore, Regional Policy Objectives 10.20 and 10.22 of the RSES, which specifically support the expansion and reinforcement of electricity transmission infrastructure to facilitate the transition to a low carbon energy system.

1.99. Its location, scale, and technology type align with the NPF's vision for a resilient, low-carbon future, and its delivery will contribute meaningfully to Ireland's 2030 targets and beyond. The Proposed Development supports the diversification of the rural economy into new sectors and services that are helping to address climate change and sustainability.

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1.100. The Planning Authority report dated 19/03/2026 provides a clear position that the proposed development is acceptable in principle and does not give rise to any matters that would warrant refusal. This is explicitly stated within the submission where it confirms that no planning concerns arise which would justify a refusal of permission.

1.101. The proposal is recognised as strategic electricity infrastructure which facilitates the connection of permitted renewable energy developments to the national grid. It is fully aligned with national regional and local policy objectives which support the delivery of renewable energy and the reinforcement of transmission networks. On this basis the principle of development is firmly established.

1.102. In environmental terms the Planning Authority is satisfied that potential impacts can be appropriately managed. Ecological assessments confirm no adverse effects on designated sites subject to mitigation. Landscape and visual impacts are limited and the site is not subject to significant constraints. Flood risk, archaeology and environmental services are all addressed with standard safeguards.

1.103. While a range of conditions are recommended these relate to construction management road reinstatement environmental protection and infrastructure provision. These are routine and do not reflect any fundamental planning concern. The requirement for financial contributions and a community benefit are noted.

1.104. Overall the position of the Planning Authority is that the development complies with the proper planning and sustainable development of the area. There are no substantive issues

identified that would justify refusal and the proposal is supported subject to conditions. It should also be noted that applications for electricity infrastructure under Section 182A are not currently subject to RED III completeness provisions as no amendment has been made to apply those regulations to s. 182A.

ENVIRONMENTAL