

Observation on Strategic Infrastructure Development Application
Ballyglass 10 year planning permission for a 110kV substation, underground grid
connection and associated infrastructure

Submitted by / Observers:

Greg Larkin & Louise Kiernan

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ACP Case reference: VA03.324491

Re: The development subject to this application forms part of grid connection and access arrangements which will facilitate the connection of the permitted **Ballyglass Solar Array Phase 1** (Clare County Council Reference P22 - 591 and An Coimisiún Pleanála Reference ABP -316043 -23) and **Ballyglass Phase 2** (Clare County Council Reference P24 -60485 and An Coimisiún Pleanála Reference PL -500253 -CE - 25) to the national grid. This application is accompanied by a Natura Impact Statement (NIS) .

Applicant: Reeve Wave Ltd.

Introduction

Our family are long term residents of Oakfield, Clonlara, on the L70382 road, Eircode V94X4H0; our home is referenced as **H020** on the applicant's **Ballyglass Solar Array - 24/06/2024 Map**. – as identified in the image below - approximately 80m from the 'New Entrance' to the proposed new substation development.

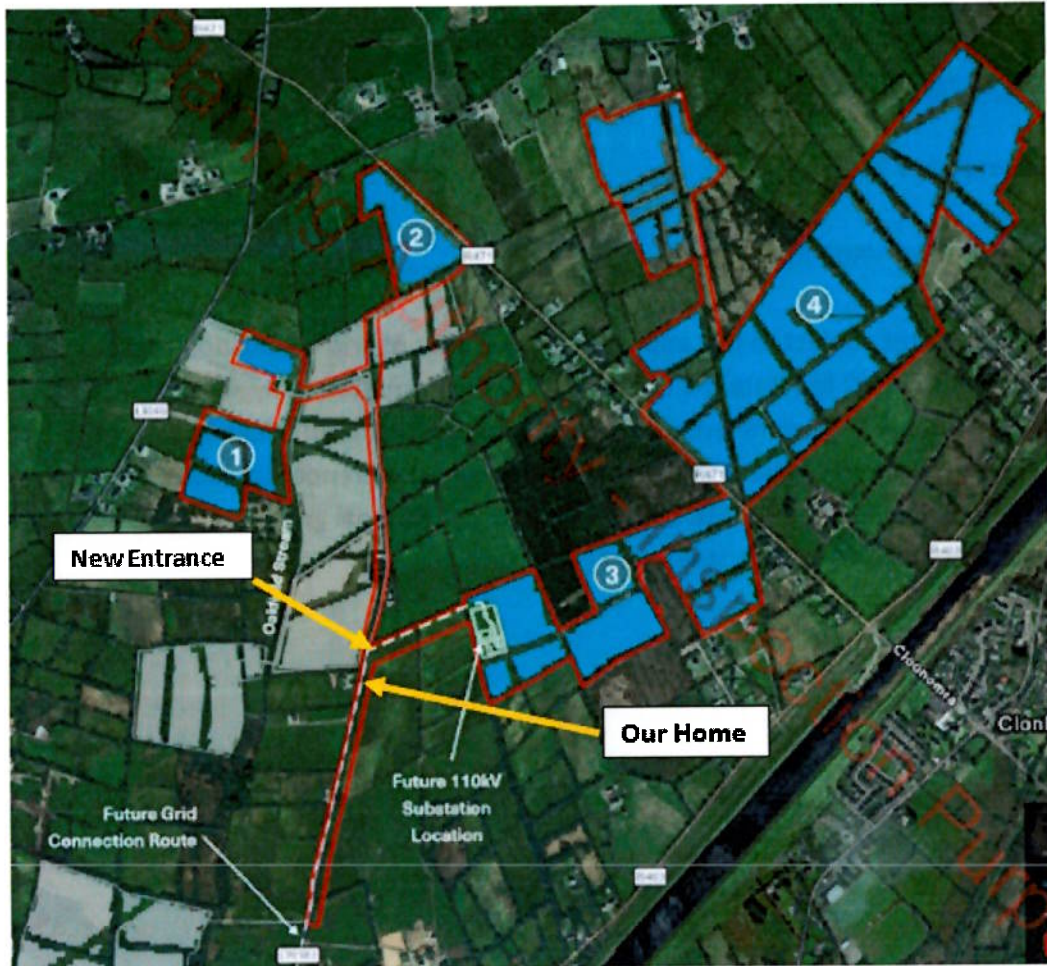


Image above is from the applicant's Phase 2 Construction & Environmental Management Plan, Figure 2.2. - Ballyglass Site Layout Map, showing Permitted Phase 1 (in grey) and (newly) Permitted Phase 2 Development (in blue).



Image above showing the proximity of the proposed new "Entrance 1" approximately 80m from our home entrance.

1. Character of L70382 - narrow single-lane rural cul de sac

The L70382 is a quiet, very narrow (2.5m wide) rural cul de sac and is used daily by households on the road for walking amenity, exercising horses and for typical work, school/university and shopping access to the R463.

As it's a cul de sac, there is only one exit, the southern exit to the R463. There is no hard roadside verge on most of the L70382, and mature established oak and ash trees, and hedgerows line much of the road.

12	L70382 Looking North. Pavement fair. Approx width 2.5m. Overhead cables LHS.	 Civil & Structural EA 04 Jun 2022 15:46:33
Picture 12: BMG_7340		
13	L70382 Looking North. Pavement fair. Approx width 2.5m. Overhead cables LHS.	 Civil & Structural EA 04 Jun 2022 15:46:33

Image above from Applicant's **Site Access Report** p.23, demonstrating the narrow, tree-lined character of the L70382.

2. Substation location accessed via L70382 means excessive and hazardous construction traffic volumes

There are two site entrances on L70382 (associated with Phase 1 and Phase 2) and this will bring all associated HGV and working construction traffic onto the single-lane cul-de-sac past our home. As L70382 is single lane, any traffic, HGV or car, on the road **will block L70382** for traffic in the opposite direction.

We believe this will severely restrict our access, and other road residents' access to their homes, and in an emergency (Garda, Fire, Ambulance) situation, imposes an unacceptable risk to residents.

From the Applicant's *Site Access and Drainage Report Section 4.1 Traffic*

- HGV trips for the combined Phase 1, Phase 2 and substation/grid connection construction is **6,567** HGV trips over the 18-month construction period;
- The (new) substation location will bring an **additional 4064 HGV** trips (62% of total trips) onto the L70382, up to Entrance 1.
- **Worker Traffic:** The applicant has not included the traffic figures generated by the substantial construction staff working on-site. According to the *Site Access and Drainage Report Section 4.1* there will be up to **80 workers commuting to the site** during the construction period. The traffic generated by these daily movements is in addition to the HGV traffic and will be an enormous increase on current residential levels, and as noted, a single car has the same impact as a HGV, i.e. blocking the road to oncoming traffic.
- The HGV/construction traffic will effectively close the L70382 public road for the duration of the construction phase, and will **not be mitigated** by the Applicant's proposed "Stop-Go" system.

From the Applicant's *Site Access Report p.12*:

Stage	Site Works	Installation	Commissioning	Completion	Total
Solar Array Phase 1					
Solar Farm Phase 1	584	431	36	66	1,117
Solar Array Phase 2					
Solar Farm Phase 2	733	538	44	71	1,386
Substation (SID Application)					
Substation / Grid Connection	512	2734	708	20	4,064

Table 4.1: Cumulative HGV trips for the Phase 1 solar array, the Phase 2 solar array and the substation and grid connection.

- The image below demonstrated where the road was blocked for a number of hours during minor maintenance by a Telecoms company.



Our residential local road L70382, blocked during maintenance by a Telecoms company, 2022.

3. Damage to mature trees lining L70382, further road blockages by underground cable trenching.

The applicant proposes that *“the cable will run south along the L70382 for approximately 1.3km to where it meets the R463. The cable ducts will be installed in an excavated trench, typically to a depth of 1.3m.”*

Damage Risk to Mature Roadside Trees:

- We believe there is a high risk that the 1.3m deep excavation and use of heavy plant for 1.3Km along the L70382 will irreparably damage the mature roadside trees and their root systems.
- There are tens of mature Oak and Ash trees lining the narrow L70382, and in particular, at the southern end of the road, there are several, very large mature Ash and Oak trees, directly on the roadside, that will be particularly vulnerable to damage from this proposed work.
- The Applicant has **not** provided any documented audit of trees lining the proposed 1.3Km cable route, nor analysis of potential damage to the trees, their root systems, and the consequent structural stability of the trees, caused by the trenching work, all along the 1.3Km route. The Applicant has provided no mitigation proposals. We believe the Commission should require this analysis.
- All references to Trees in the Applicants documentation (Ecological Impact Assessment, Planning & Environmental Report etc.) is in the context of habitats, not related to possible construction effects on Trees.
- There is also cable trenching work (as part of Phase 2) inside the O’Brien lands, close to and parallel to the L70382, doubling the risk to the Tree root systems.

(see Appendix for photos of trees).

Blocking Residential Access:

- The open-trench construction work will block access on the L70382 road, compounding the construction blockage as outlined in the previous point above, and the Applicant does not demonstrate how this can be mitigated by the Applicant’s proposed “Stop-Go” system, nor how full emergency and residential access, for all households along the road, can be maintained while trenching is in progress.
- We conclude that the road will be effectively closed for the duration of the trenching work.

We ask that the Commission require the Applicant to provide evidence there will be no damage to Trees, no impact on residential access, as part of this trenching work, **or that the Applicant proposes an alternative route.** We note that the Applicant proposed a different 110KV underground cable route in Phase 1, along the L3046, and this was entirely changed in Phase 2, now having the substation and underground cable route along the L70382.

4. Noise Impact on our home

The applicant has carried out a study for operational noise levels with cumulative noise impact from the proposed substation development in combination with the Phase 1 and Phase 2.

However, the applicant study (Noise Impact Assessment) has not measured Noise Impact at our home. The closest NSL noise impact location appears to be NSL 14, a neighbour's house, although we are closer to the substation Entrance 1 (~80m) and will have all construction traffic passing our home. We believe the Applicant should be required to estimate Noise Impact at our site.

5. Adverse Impact on Equestrian Routes along L70382

Along with three other residents, we own a number of horses and do not have facilities to exercise horses on our property, so are dependent on using the full length of our local road the L70382 to exercise our horses daily. Another neighbour regularly uses a carriage to drive two horses.

We are extremely concerned that this will prove impossible during the combined "Phase 1", "Phase 2" and substation construction period because of safety risks from the impact of HGVs and other related construction traffic when coming in contact with horses and riders on a single width lane over a distance of 2 km. The applicant did not provide any solution to the residents as to how they could safely continue with these daily activities.

The applicant has not consulted with the residents to explain how the operational flow is possible. No proposal has been put forward to explain how the residents on foot, horse back, carriage driving and in cars can travel safely on the road.

6. Alternative Routes for underground grid connection

Two alternative cable trenching routes have previously been outlined by the Applicant:

- The Applicant proposed a different 110KV underground cable route in Phase 1, along the **L3046**, and this was entirely changed in Phase 2, with the substation and underground cable route now along the L70382.
- In discussions with residents, the Applicant's representative (Mr James Crowley), outlined a cable route **through agricultural lands**, parallel to the L70382 (owned by landowners participating in this development).

Significant to the assessment of alternative and viable cabling routes is a planned entrance to the Phase 2 development, described as "**Entrance 3**" in the Applicants Phase 2 documentation, that is accessed via the wider R471 (see image below).

We request that the Commission questions why the Applicant has proposed routing the cable along the narrow single-lane L70382, lined by mature trees, instead of alternatives, particularly if a route using “Entrance 3” and the wider R471 avoids the serious residential and environmental impacts of using the L70382.

Given all the considerations, we request the Commission ensures the most appropriate cabling route is chosen, not the expedient one.



Image from Site Access and Drainage Report, Ballyglass Solar Array Phase 2, p6. Figure 3.3:

7. Non-compliance by Applicant to Clare Planning Authority requests to reduce scale of Phase 1 and 2 developments in the interests of residents.

The Applicant has outlined their 'programme of consultation', however in our view this programme has been purely information dissemination, and none of the serious concerns of the residents, throughout the entire Phase 1 and 2 of the project, has influenced or altered the Applicant's plans.

We remind the Commission that in both Phase 1 and Phase 2 proposals, the Clare Planning Authority requested the Applicant to reduce the scale of the developments in the the interests of residents. In both cases, the Applicant, Reeve Wave, refused the Planning Authority, demonstrating a careless disregard for residents' reasonable requests.

Phase 1:

The Applicant was requested to reduce the PV array in the field beside our home, by 50%, (dwelling H128 on Applicants maps), i.e. reducing the entire project footprint less than 2 ha. The Applicant did not comply with this. Relevant extract from Clare Planner's report 17th. February, 2023, below.

3. Prior to the commencement of the development the applicant shall submit the following for the written agreement of the Planning Authority and the works shall subsequently be carried out in accordance with this agreement.
 - (a) Revised drawings and particulars which includes a 50% reduction in the proposed solar pv arrays in field no. 13, located to the north of the dwelling identified as H128. Proposed pv panels in the impacted field shall be located in the northern half of the field. This shall include the relocation of the proposed fencing and any associated equipment to the northern half of the field.
 - (b) The new boundary shall be landscaped in line with mitigation measures outlined in the Landscaping and Visual Impact Assessment received by the Planning Authority of the 4th July 2022, and a revised landscaping plan shall be submitted to the Planning Authority for written approval.

Reason: To protect the character of the rural area and in the interests of residential amenities.

Phase 2:

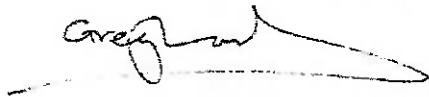
Clare County Council's communication to the Applicant on 27th. November 2024, stated, *"having regard to other proposed and permitted solar developments at this geographical location, there is a concern regarding the overconcentration and proliferation of solar developments....with resulting impacts on the rural and landscape character of the area.....the Planning Authority considers that the subject development **should be reduced in scale in order to reduce the overall impact on the surrounding landscape in terms of visual and residential amenity and loss of rural amenities."***

In their response, the applicant **disregarded** both the Planning Authority's requirement, and the residents' serious concerns, and refused to make any reduction in the scale of the 170ha industrial Phase 2 site.

Conclusion

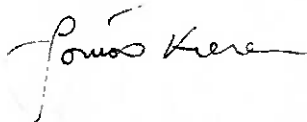
We firmly believe that the L70382 is not a suitable route for the proposed underground cabling trenching works and substation construction activities, and we request that An Coimisiún Pleanála give serious consideration to our observations before deciding on this application.

Regards,

A handwritten signature in black ink, appearing to read 'Greg Larkin', with a long horizontal stroke extending to the right.

Greg Larkin

and

A handwritten signature in black ink, appearing to read 'Louise Kiernan', with a stylized, cursive script.

Louise Kiernan

Appendix

Six photographs showing the extent of mature trees lining the proposed 1.3Km underground cabling route on the L70382. Photos taken on September 25th. 2026, walking south along the L70382 from our home to the R463.

