

**OBJECTION TO STRATEGIC INFRASTRUCTURE
DEVELOPMENT Application under Section 182A of
the Planning and Development Acts 2000**

**Proposed: Walterstown Electricity Substation and
Associated Grid Connectivity**

**Townlands of Walterstown, Dunboyne, County
Meath**

Location name: “Walterstown Substation”

Submitted to: An Coimisiún Pleanála

Submitted by: Camillus Woolhead

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Name: Camillus Woolhead

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I Camillus Woolhead am Strongly objecting to the proposed development of a 50 Thousand square foot substation and associated site works, in the field in the area of Walterstown, Co Meath. For the following reasons.

Introduction, Standing and Context.

I, Camillus Woolhead, a resident of the wider local area, hereby lodge this formal objection to the above-referenced Strategic Infrastructure Development (SID) application pursuant to Section 182A of the Planning and Development Act 2000 (as amended). While this submission is made in my name alone, it reflects well-founded concerns shared by nearby households and residents who are directly affected by the scale, intensity, cumulative burden, and environmental risk associated with the continued concentration of energy infrastructure in this locality.

The proposed development comprises:

- A 110kV or 220kV electricity substation.
- Using Air Insulated Switchgear (AIS) or potentially Gas Insulated Switchgear (GIS).

The application is characterised by fundamental uncertainty, excessive design flexibility, and reliance on future decisions by third parties outside of the area. These deficiencies undermine environmental assessment, public participation, and compliance with proper planning and sustainable development.

Excessive Design Flexibility and Lack of Project Definition A central flaw of this application is that the Board is being asked to approve a development which is not defined with sufficient certainty.

The applicant seeks permission for:

- A 110kV or 220kV substation.
- AIS or GIS switchgear.
- 110kV or 220kV underground cabling.
- Alternative routing options for the final section of the cable (public road or private land). These are not minor or ancillary details. Voltage level, switchgear type, and routing materially affect:
 - Fire risk and emergency response.
 - Environmental risk and pollution pathways.
 - Construction impacts.
 - Visual, noise, and landscape effects.
 - Effects of the devaluation of all properties in close proximity.
 - Impact of the increased traffic on the residents who utilise this area as a very much treasured amenity
 - Deterioration of the quality of life of the people and the residents who will have to live beside this development for the rest of their lives.
 - How are the applicants going to mitigate the effects of the removal of the green spaces and hedgerows on the local and visiting wildlife.

Deferring these matters to other parties deprives the Board and the public of the ability to properly assess impacts. This approach conflicts with settled planning principles and undermines the Aarhus Convention right to informed participation.

Project Splitting and Failure to Assess Cumulative Impact The proposed development forms part of a single, integrated energy project, comprising:

- Multiple large-scale solar farms (permitted and proposed).
- This proposed substation.
- The underground grid connection.
- Reasonably foreseeable associated infrastructure required to stabilise and manage grid export. Advancing these elements through separate applications represents project splitting, contrary to Irish planning law.

No single EIAR has assessed:

- Combined construction impacts.
- Combined hydrological and ecological risk.
- Combined traffic disruption.
- The cumulative industrialisation of a

rural landscape. This piecemeal approach is inconsistent with proper planning and sustainable development.

Hedgerow Removal, Habitat Fragmentation and Green Infrastructure The CDP identifies hedgerows, field boundaries, and watercourses as critical components of County Meath Green Infrastructure network. The proposed cabling will:

- Remove or damage hedgerows.
- Fragment linear habitats.
- Weaken ecological connectivity. The application

lacks:

- A comprehensive hedgerow loss inventory.
- Firm commitments to like-for-like replacement.
- Long-term ecological management measures.
- The loss of traditional feeding and nesting areas for local and visiting birds

Incremental loss across multiple projects directly undermines CDP biodiversity policies and cannot be dismissed as insignificant.

The environment impact completed in a short period is completely inadequate to make a meaningful assessment of the bird population. There have been several occasions when I personally have spotted Kestrels, Merlins, Snipe, Yellowhammers and Barn owls using this area extensively some of these birds are winter visitors to this area the environment impact assessment should be completed over a period of one year only then can we ascertain the density of the species using this area, an adhoc survey is not good enough.

I can confirm that these lands are key hunting grounds for Irish Merlin and visiting Merlins. I have witnessed these protected species hunting regularly on these grounds, along with Kestrels Sparrowhawks.

The Irish Merlin species is protected under the wildlife acts, EU birds Directive Annex1 and international agreements like the Bern Convention, The Merlin is listed as an Amber in the Irish bird convention concern.

The main threat to the Irish Merlin is Habitat loss.

The Sparrowhawk is protected under the Wildlife act 1976+Amendment Act 2000 European Communities birds and habitats regulations 2011, and is illegal to disturb nesting sites.

The Irish Kestrel is the highest Conservation Status Red list in Ireland due to massive decline of habitat.

5. Fire Risk, Environmental Pollution and Emergency Response Capacity. Fire Risk Associated with High-Voltage Substations
High-voltage substations involve: • High-energy electrical equipment.

• Oil-filled transformers (in many configurations).
• Continuous operation under load. Transformer and substation fires, while infrequent, are high-impact events, producing:

- Intense heat.
- Toxic smoke.
- Large volumes of

contaminated firewater. Where GIS is used, additional risk arises from sulphur hexafluoride (SF₆), a hazardous substance if released. No site-specific fire risk assessment has been submitted. Firewater Runoff and Pollution Pathways Fire suppression typically requires large volumes of water, which can become contaminated with:

- Transformer oils.
- Heavy metals.
- Combustion by-products.

Given that, any failure of containment presents a direct pollution pathway. In *People Over Wind v An Bord Pleanála* [2018] C-323/17, the CJEU confirmed that mitigation cannot be assumed where uncertainty remains. The absence of worst case fire and pollution modelling is therefore a critical flaw. Emergency Response Capacity The application provides:

- No evidence of consultation with the local fire authority.
- No confirmation that specialist equipment is available locally.
- No assessment of response times or access constraints.

In rural areas, fire services are often retained and resource-limited. High-voltage electrical fires require specialist training and coordinated response. The absence of a tested emergency response plan is incompatible with proper planning.

6. Inappropriate Siting in an Environmentally Sensitive Location
Best planning practice requires that high-risk infrastructure be located where:

- Environmental consequences of failure are minimal.
- Pollution pathways are limited.
- Sensitive receptors are avoided. Here, the convergence of:
 - High-voltage infrastructure.
 - Proximity to watercourses.
 - Uncertain emergency response capacity. means the consequences of failure are unacceptable, even if probability is low. In *Holohan v An Bord Pleanála* [2018] C-461/17, the CJEU emphasised that all aspects of a project capable of affecting a Natural site must be fully assessed. That threshold has not been met.

7. Conflict with the Meath County Development Plan 2022–2028
The proposal conflicts with multiple MDP objectives, including those relating to:

- Protection of rural character and landscape.
- Avoidance of over-concentration of infrastructure.
- Safeguarding water quality and Natura 2000 sites.

- Protection of biodiversity and green infrastructure.
- Community well-being and participatory planning. While the MDP supports renewable energy, this support is explicitly conditional on compliance with environmental protection and proper planning. Those conditions are not satisfied here.

8. Conclusion and Request This application is fundamentally deficient due to:

- Excessive design uncertainty.
- Project splitting and lack of cumulative assessment.
- Unresolved fire and pollution risk.
- Conflict with the Meath County Development Plan.

Applying the precautionary principle and relevant Irish and EU case law, the Board cannot be satisfied that the proposed development will not result in adverse environmental effects.

9, lack of consultation

Zero community consultation with the local neighbours on the proposal of this substation, 90 percent of people in the local area are an aging demographic and were completely unaware of the proposal of this substation.

Conclusion.

My son has a newly built house directly beside this field, I often take my 2 year grand daughter walking on the road beside her home this development will directly effect the quality time that we spend together.

I will be put into negative equity due to the depreciation of the cost of my family home and will be forced to move away from this area as the impact to my family will be too great to continue to live in this area, the impact stress and sleepless nights have already caused significant worry to my family and with zero communication from the ESB board in regard to the proposed development this has come as a complete surprise.

I respectfully request that An Coimisiún Pleanála refuse approval for the proposed development. In the alternative, the Board should require:

- A single, integrated EIAR.
- Removal of core design ambiguity.
- Full fire, hydrological, and emergency response assessment.
- Proper cumulative and plan-led evaluation.

Signed: Camillus Woolhead
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