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 Co Meath

Location name: “Walterstown Substation”

Submitted to: An Coimisiún Pleanála

Submitted by: Terence Woolhead
Evergreen Walterstown
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I Terence Woolhead am Strongly objecting to the proposed development of a 50 Thousand square foot substation and associated site works, in the field about 50metres beside my family home in Dunboyne County Meath. For the following reasons.

1. Introduction, Standing and Context.

I, Terence Woolhead, a resident of the wider Walterstown 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. These deficiencies undermine environmental assessment, public participation, and compliance with proper planning and sustainable development.

2. 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. • A 110kV or 220kV substation.
   b. • AIS or GIS switchgear.
   c. • 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:
   d. • Fire risk and emergency response.
   e. • Environmental risk and pollution pathways.
   f. • Construction impacts.
   g. • Visual, noise, and landscape effects.

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.

3. 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.

4, 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.

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

I am also a member of the Irish Hawking Club and also British Hawking club, also a licence holder to hold and fly a bird of prey from National parks and Wildlife Service.

I strongly encourage the board to ignore all aspects of the environmental impact study, this study states an **AD-HOC** survey was carried out on the impact to the local bird population, how can a **ONE** day field walk be sufficient to assess the impact on the local bird population.

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

Also I can confirm these grounds do hold bats and only last year I had a “Leisler’s bat” on my property which is an endangered species.

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+Amendent Act 2000 European Communities birds and habitats regulations 2011, and is illegal to disturb nesting sites.

The Irish Kestrel is the highest Conversation 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 (SF_6), 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 Natura 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 greeninfrastructure.
- 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.

The overall impact to my family and home will be extraordinary if the proposal goes ahead,
Having suffered from Asthma all my life I will not be able to go outside my family home

I will be put into negative equity due to the deprecation 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: Terence Woolhead
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