Outlook

RE: An Coimisiún Pleanala Reference ACP - 324102 -26 - 110kV AIS electricity substation

From SIDS <sids@pleanala.ie>
Date Tue 6/9/2026 5:22 PM
To Conor Frehill | HW Planning <cfrehill@hwplanning.ie>
Cc Luke Cuddihy | HW Planning <LCuddihy@hwplanning.ie>

Dear Conor,

I wish to acknowledge receipt of your email.

Kind regards,
Niamh

From: Conor Frehill | HW Planning <cfrehill@hwplanning.ie>
Sent: Tuesday, June 2, 2026 5:08 PM
To: SIDS <sids@pleanala.ie>; Bord <bord@pleanala.ie>
Cc: Luke Cuddihy | HW Planning <LCuddihy@hwplanning.ie>
Subject: An Coimisiún Pleanala Reference ACP - 324102 -26 - 110kV AIS electricity substation

An Coimisiún Pleanála - Case reference: VA04.324102

located in the townlands of Aglish and Currahaly, County Cork.
(www.aglishsubstation.ie).

Cork County Council

Dear Sir / Madam,

We act on behalf of Aglish Solar Farm Limited, applicant in the above matter.

We welcome the opportunity to comment on observations made on the file by An Coimisiún Pleanála.

Please see enclosed response. I would be grateful if you could acknowledge receipt of same by way of reply.

Kind regards

Conor Frehill
Director

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Connecting people.
Connecting places.

The Secretary
An Coimisiún Pleanála
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2nd June 2026

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Directors:
Harold Walsh
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Company Reg. No:
486211

Re: An Coimisiún Pleanala Reference ACP- 324102-26: Application under section 182A of the Planning and Development Acts (as amended) by Aglish Solar Farm Limited for the approval by An Coimisiún Pleanála for a period of 10 years for development at Aglish and Currahaly (townlands), County Cork. The proposed development comprises 1) A 110kV Air Insulated Switchgear (AIS) electricity substation with single-storey substation building, single-storey Independent Power Producer (IPP) control room building, High Voltage (HV) electrical equipment and associated infrastructure (to include transformer, lightning protection masts, back-up diesel generator, fire/blast wall, telecoms pole, perimeter security fencing, security lighting, water and drainage infrastructure, and temporary construction compound) to connect to and serve a solar farm; 2) Associated loop-in / loop out infrastructure to connect into an existing 110kV overhead transmission line (including underground 110kV cabling [lengths of ca.790 and 880m from proposed substation to interface towers, including HDD crossing of L2204 road], 2 No. new interface towers and decommissioning of ca. 75m of existing 110kV overhead line); 3) Construction and operational access from the public road L2204; 4) All ancillary site development, landscaping and earthworks. The development subject to this application forms part of grid connection and access arrangements which will facilitate the connection of the proposed Aglish Solar Farm (Cork County Council Reference 24/6157 / An Coimisiún Pleanála ACP-323402-25) to the national grid.

Dear Sir/ Madam

We act on behalf of Aglish Solar Farm Limited, applicants in the above matter. Further to recent correspondence, we welcome the opportunity to comment on the shared observations on the application from the following parties:

- Cork County Council;
- Transport Infrastructure Ireland (TII);
- Inland Fisheries Ireland;
- Department of Housing, Local Government and Heritage;
- Local community members (50 no. in total).

This response is structured as follows to address the observations of three grouped stakeholders:

1. Cork County Council;

2. Prescribed Bodies;

3. Community Members (Third Parties).

There are a number of cross cutting themes in the community observations related to nature of development, landscape, construction management and some other matters. On that basis, a decision has been taken to respond to these submissions made on a topic-based basis. It is notable also that many of the community objections relate to the solar farm more generally, which is not the subject of the subject application before the Commission under reference ACP- 324102-26.

The proposed development will facilitate the connection of the Aglish Solar Farm (Cork County Council Reference 24/6157 / An Coimisiún Pleanála ACP-323402-25) to the national grid. We note that An Coimisiún Pleanala granted planning permission for the solar farm planning application, which included consideration of cumulative impacts associated with the subject substation and grid connection development, on 14th May 2026.

01. Cork County Council

The submission on behalf of Cork County Council confirms their acceptance in relation to the principle of the proposed development at the subject location. In summarising the governing planning policy, it is evident the proposed development is supported by significant national, regional and local objectives. At the local level, this includes direct reference to the need to support national and local climate objectives (Objective CA 17-1), to achieve a reduction in greenhouse gas emissions, an increase in renewable energy, and an increase in energy efficiency (Objective CA 17-2), in addition to compliance with the Cork County Council Climate Action Plan 2024-2029.

The submission of the Council, including supporting internal reports, confirms their general satisfaction with ecology, landscape and visual, flood risk, traffic and access, and noise impact assessment reporting for the application. They further acknowledge the findings of the Appropriate Assessment and Environmental Impact Assessment screening statements, which objectively screen out the need for a Stage 2 Natura Impact Statement or the need to prepare an Environmental Impact Assessment for the proposed development.

The concluding recommendation is Cork County Council's submission is that Further Information should be sought "particularly in relation to issues raised in the County Archaeologist Report". A review of the other internal reports shared indicates that no other officer's directly requested further information pre-decision. A suite of planning conditions is recommended in some cases.

The recommendation of the County Archaeologist is not in itself unusual insofar that it is consistent with her recommendations under the Aglish Solar Farm application, which Cork County Council refused only on the grounds of perceived incomplete archaeological assessment. It is recommended here that the Commission seek further archaeological investigations in the form of Geophysical survey and test trenching be undertaken prior to a grant of permission. This is predicated on a view that such investigations are justified under Objective HE 16-9 of the Cork County Development Plan 2022-2028. With this, it is acknowledged that An Coimisiún Pleanála may grant planning permission without this additional work pre-decision, and suggested conditions have been provided.

The basis for not completing geophysical survey and/or testing pre-decision in the subject case is set out clearly in the submitted application. A detailed Archaeological, Architectural and Cultural Heritage Impact Assessment of the proposal has been prepared by Rubicon Archaeology and is enclosed with this application. The assessment included a study of the archaeological and historical background of the proposed development site and the surrounding environs. This included information from the Record of Monuments and Places of County Cork, the topographical files within the National Museum, and all available cartographic and documentary sources for the area. A number of site and field inspections were also conducted with the aim of identifying any previously unrecorded features of archaeological or historical interest. The proposal has been designed having regard to site inspections and analysis undertaken. A strategy of mitigation by avoidance has been adopted. It has been demonstrated that the proposed development will not have any direct effect on any known archaeological sites. No significant impacts have been identified. The applicant is fully committed to completing the archaeological geophysical survey and testing after permission is granted. The rationale for this is set out in Section 6.3 of the submitted archaeological report, as well as Section 4.4 of the Planning and Environmental Statement.

As noted above, An Coimisiún Pleanála have recently adjudicated on this specific matter as part of the First Party appeal for Aglish Solar Farm and determined that permission can reasonably be granted, inter alia, having regard to national policy and guidelines, the level of archaeological assessment completed to date, embedded mitigation, and established precedent. It should be noted also that the proposed SID development is located within the same field systems as the wider Aglish solar farm, and therefore, the Commission's consideration of archaeology in that application had regard to the same localised impacts which are associated with the subject substation and grid connection. On that application,the inspector reached the following reasoned conclusions:

> *"I am satisfied that the Applicant has provided a robust archaeological assessment that satisfies the various criteria outlined within the NMS guidance document. Embedded mitigation has ensured that direct impacts on RMPs are avoided through the incorporation of buffer zones...".*
>
> and
>
> *"I am satisfied that the archaeological requirements can be dealt with by way of condition. It is reasonable in my view to determine that the proposed development would be unlikely to have a significant impact on sub-surface archaeology when there is a strict requirement to adhere to these specified archaeological measures. Whilst I accept that it may be preferable to undertake targeted geophysical surveying and archaeological testing at the earliest possible stage in the scheme's design, I am satisfied that it has been demonstrated that the proposed development does not contravene Objective HE 16-9 of the Development and therefore, a refusal of permission is not warranted in this instance. This is of particular significance in the context of achieving the ambitious national climate targets and the pressing need to deliver renewable energy projects of this nature which I have discussed earlier in this report".*

The proposed approach is consistent with precedent established on other solar farm sites nationally, including substation / grid connections at Ballysallagh, Co. Cork (reference 321518-24), Rathcoursey, Co. Cork (reference 318685-23), Delamain, Co. Kildare (reference 319252-24), Garreenleen, Co. Carlow (reference 313193-22), and Tullabeg, Co. Wexford (reference 305803-19), among others.

Based on the adopted mitigation by design avoidance strategy, and the findings of the Rubicon Heritage Report, we submit the requirement for geo-physical survey and/or testing can take place post planning decision which is consistent with established precedent. In the case of the above referenced Ballysallagh and Rathcoursey Solar Farm substations / grid connections, we wish to highlight again that both of these applications were granted under the auspices of the current Cork County Development Plan 2022-2028. We respectfully request that the Commission issue a decision to grant permission for the subject substation / grid connection consistent with that established under Aglish Solar Farm.

There are no other matters of note in the Council's submission which would preclude a grant of permission in this case.

02. Prescribed Bodies

INLAND FISHERIES IRELAND

The observation from Inland Fisheries Ireland (IFI) dated 26th February 2026 raises no objection to the proposed development and asks that planning conditions require no interference with watercourses, their banks or bed or bankside vegetation without the prior approval of IFI.

The proposed development does not include proposals to interfere with, bridge, drain or culvert a watercourse.

DEPARTMENT OF HOUSING, LOCAL GOVERNMENT AND HERITAGE

The submission from the Department of Housing, Local Government and Heritage is focused on archaeology only. It notes the assessment completed by the Applicant and advises that *"advance archaeological geophysical survey and advance archaeological test excavation of all greenfield areas of the PDS[1] should be carried out in advance of any development to determine if previously unknown sub-surface archaeological features or deposits are present".* It further advises that *"this can be addressed by the inclusion of an appropriate condition, if the development is permitted*". The Department attach a recommended condition which aligns with Sample Conditions C3, C5 and C6 as set out in OPR Practice Note PN03: Planning Conditions (October 2022).

The Applicant has reviewed the condition in question and is happy with its imposition. We request that this be formalised under any decision to grant planning permission. As outlined, it has been demonstrated as part of the submitted reporting that an appropriately worded planning condition will alleviate any archaeological concerns on the site whilst simultaneously facilitating a positive and timely decision.

TRANSPORT INFRASTRUCTURE IRELAND

The submission by Transport Infrastructure Ireland (TII), dated 30th March 2026, acknowledges the importance of and supports the delivery of proposals that assist with the transition to a low carbon

[1] Proposed Development Site.

and climate resilient economy, *"increasing renewable energy generation and enhancing energy security".* This is welcomed by the Applicant.

In relation to the proposed haul route from Port of Cork to site, the submission suggests more information is needed on the nature and characteristics of the haulage. No objection to the proposed development is raised. As set out in the submitted Construction and Environmental Management Plan, the majority of deliveries to the site will be in standard HGVs. It is further confirmed that an abnormal load delivery will be made to the substation site as part of the construction phase for the delivery of the transformer. The autotrack analysis conducted for the subject SID application included modelling of abnormal load delivery for the transformer, demonstrating that the delivery of this component can be safely accommodated. The submitted Planning and Environmental Statement included commitments on adhering to any identified requirements for Exceptional Abnormal Loads, to be detailed as part of the future Construction Traffic Management Plan (CTMP) for the project. A suggested condition was provided in this regard. It is unclear if TII saw this information. Notwithstanding, the TII submission concludes with suggested conditions to be attached to any grant of permission related to, inter alia, the submission and agreement of full details of Abnormal Loads, pre- and post-structural surveys, and pavement reinstatement, where necessary. The Applicant can confirm in the case of the development subject to this SID application that it will reference all stipulated requirements in the final CTMP and will consult with TII, and other parties where necessary, prior to the commencement of development.

03. Community Members

There are 50 submissions from local residents on the public file. Some of these submissions include the same text or theme in their objections. The response to these observations are grouped as follows.

LANDSCAPE

The majority of observations on the file suggest that the proposed substation / grid connection will result in landscape and visual impacts, in what is perceived to be a very sensitive landscape. The points raised in relation to this have been reviewed by the project landscape consultants Macro Works, with a response to same enclosed. The summary points of response include:

- Landscape Character: The proposed Aglish SID Substation and grid connection is located within a rolling rural agricultural landscape. It is characterised predominantly by pastoral farmland enclosed by mature hedgerows, scattered trees and intermittent woodland blocks. In landscape character terms, the proposed development is located within LCT6a – Broad Fertile Lowland Valleys, identified in the Cork County Development Plan and Draft Cork Landscape Strategy as having 'High' landscape value, 'High' landscape sensitivity and 'County' level importance. The wider consented Aglish Solar Farm extends into LCT8 – Hilly River and Reservoir Valleys, which carries 'National' level importance and encompasses the more visually sensitive River Lee corridor. The proposed development itself is located outside the mapped High Value Landscape (HVL) designation, which is principally associated with the River Lee Valley and surrounding elevated lands. Within the 5 km study area, visual designations are limited to two scenic routes, namely Scenic Route S37 (Leemount–Macroom via Coachford) and Scenic Route S38 (Classis–

Curraghbeg–Coachford), both of which derive their scenic value from the River Lee corridor and associated valley landscapes. Overall, the primary landscape and visual sensitivities are concentrated within the northern River Lee corridor, away from the proposed substation / grid connection.

- **Viewpoint Selection:** In relation to criticism of viewpoint selection for photomontage preparation, as part of the Landscape and Visual Impact Assessment, this is guided by the GLVIA3 (Guidelines for Landscape and Visual Impact Assessment). The viewpoint selection is undertaken utilising the ZTV (Zone of Theoretical Visibility) mapping, which provides the basis for selection of key viewpoints from which to study the visual and landscape impact of the proposed development in detail. Representative viewpoints are selected using the following categories;
  - Key Views - from features of international or national importance;
  - Amenity Views - from important heritage or amenity locations;
  - Designated Scenic Routes and Views;
  - Local Community Views;
  - Centres of Population;
  - and Major Routes.

  Overall, it was concluded that the proposed development would not generate significant visuals effects and instead, residual visual effects would be highly localised and would be of a lower order of effect. It should also be noted that with regard to the consented solar farm, which also assesses the effects generated by the proposed substation and grid connection as part of a 'one project approach', Cork County Council concluded that "*it is considered that the development will have a localised impact but will not unduly impact on the character of the wider area*".

- **Residential Amenity**: It is stated in some quarters that additional viewpoints from private properties (including first floors) should have been prepared in the LVIA. As noted above, the viewpoints were selected in full accordance with applicable guidelines. The observers made the same claims in respect of the now permitted Aglish Solar Farm, which were addressed directly by the An Coimisiún Pleanála Inspector - *"Notwithstanding the concerns of the Third Party observers, I am satisfied that the Applicant has provided a comprehensive selection of viewpoints (including the additional viewpoints by way of FI) which are generally reflective of the key receptors in the site's hinterland. The Applicant's approach is acceptable in my view as I accept that it is not practical/reasonable to provide viewpoints from every residential receptor".*

  The substation compound is well offset from many of the observing dwellings to the north, situated along a land parcel over c. 400m to the south of these receptors. It should also be noted that the principal aspect of visual amenity afforded from these dwellings relates to views to the north across the wider Lee Valley and distant rolling hills and upland areas, in the opposite direction to the proposed development. The substation compound itself occupies a relatively modest footprint within the wider landscape context and the lower built elements remain screened in many local views. The interface towers comprise slender structures and do not present as visually dominant features across the wider study area, and are viewed in the context of the existing overhead cable corridors that traverse the study area.

Whilst the proposed development introduces additional built infrastructure into the immediate agricultural setting, the proposed substation and grid connection remains relatively contained with effects limited to its immediate surrounds, benefits from extensive existing vegetation screening and incorporates a comprehensive landscape mitigation strategy. In this regard, residual visual effects were assessed as ranging from Slight to Imperceptible and no significant residual landscape or visual effects were identified within the submitted assessment.

Overall, it is not considered that the observations identify any material deficiency in the submitted LVIA nor demonstrate landscape or visual effects beyond those already assessed within the application documentation.

FLOOD RISK

It is submitted that the proposed substation / grid connection will contribute to flood risk in the local area. This is not contextualised to any material degree. The subject site is not within an area of defined flood risk having regard to available resources from the Office of Public Works (OPW) and Cork County Council. Surface water drainage proposals for the proposed development have been developed to mimic the natural drainage patterns of the site and thereby be in accordance with the best management practices of Sustainable Drainage Systems (SuDS). All storm water management measures will be subject to periodic testing, review and maintenance. Cork County Council's Environmental Section have confirmed their view that the proposed development will not give rise to flood risk in the local environment.

TRAFFIC / ACCESS

The community observations claim that the local road network is unsuitable to support the proposed development. Some references are made to accidents locally and that the proposed HGV movements may exacerbate this.

This application is supported by a detailed Site Access Report by CSEA Engineering Advisors. The construction stage of the development (both the solar farm and the substation and grid connection) is anticipated to take approximately 24 months. Materials will be delivered by Heavy Goods Vehicles (HGV) and it is anticipated this will equate to a peak number of daily trips of 22 no. per day, with the average for the construction phase 10 no. trips per day. This equates broadly to 1 no. trip per hour. This includes movements for the delivery of all panels and mounting frames and cables, ducting, fencing plus additional movements for the transportation of machinery, building material, access track aggregates and waste management processes.

The information presented in the Site Access report on the quality and carrying capacity of the local road network is clear and transparent. Section 7 of the report documents the full delivery route inspection with representative images as well as a link to the full dashcam footage of the route drive / inspection. The assessment confirms that Pavement condition was found to be moderate to good throughout the inspection.

Section 10 of the Site Access Report includes a number of focused mitigation measures to minimize the impact on existing road users arising from the temporary construction phase. These include a temporary manual-controlled stop/go system, advance warning signage and a booking system for

site deliveries to avoid potential access conflicts. The project implementation process will include dedicated community liaison and pre-agreement of a construction traffic management plan with Cork County Council ahead of any construction works. This will consider the potential for cumulative impacts with other projects in the local area at the time of construction. The local planning authority have not raised any traffic or access constraints as an impediment to developing the proposed solar farm. Similarly, TII have also not raised any such concerns.

ECOLOGY

It is submitted in a number of community observations that the proposed development will result in ecology and biodiversity impacts in the local environment. Field surveys of the proposed development site were carried out to inform the submitted Ecological Impact Assessment (EcIA). The proposed development site is currently considered to be of local importance, with habitats on site ranging from lower to higher value. The location of the proposed substation / grid connection dominated by improved agricultural grassland habitat (GA1). The site is made up of two no. agricultural fields bounded by hedgerow (WL1) and separated by L2204 Road. No Annex I habitats or rare, protected or invasive plant species are present within the application site. The habitats present are considered of local importance (lower value).

Some observations claim there are badger setts in the environs of the substation / grid connection. They include photographs purporting to be evidence of such. The same claims and images were presented in objections to the proposed Aglish Solar Farm. In response to this, further dedicated badger surveys were completed between February and April 2025, comprising a visual survey plus the use of camera traps. The survey methodology and findings was presented in the updated EcIA at RFI stage for Aglish Solar Farm. No evidence of active badger setts were recorded within the proposed site. The proposed solar farm fencing includes mammal access which allows any foraging badgers to continue to use the wider area.

The proposed substation / grid connection is component part of the permitted Aglish Solar Farm. The applications included focused Biodiversity Management Plans which were prepared as an integral part of these planning applications. These BMPs have been tailored to reflect local ecological survey work completed, contributing positively to the protection and enhancement of the local ecosystems around the solar farm sites. These include specific management techniques like planting native wildflowers, creating pollinator habitats, and installing bat and bird boxes to support biodiversity, while also addressing potential impacts on existing habitats and species. These plans are underpinned by landscape and maintenance management schedules for ongoing monitoring towards the achievement of biodiversity goals commensurate with the provision of a clean form of renewable energy.

Under reference ACP-323402-25, the inspector confirmed their view that site and local area could accommodate a solar farm project of the subject nature:

> *"Having regard to the overall layout of the proposed solar farm which has been designed to avoid all higher value habitats, the minimal loss of hedgerow habitats, the incorporation of the mitigation measures proposed within the EcIA and the implementation of the various ecological enhancement measures as detailed in the BMP, I am satisfied that the proposed development*

will not have significant impacts on existing habitats within the site and the proposed development is therefore acceptable in my view".

NOISE

It is submitted that the proposed development will result in noise impacts in what is a 'low noise' environment. The observation by Karina and Con Dineen claims that there is already a low level hum from the existing operational transmission network in the local area. Any existing noise would have been captured as part of the baseline noise survey collected.

The application is accompanied by a Noise Impact Assessment Report by Wave Dynamics which has been prepared having regard to Statutory Instrument No. 549/2018 of the European Noise Regulations; BS 8233:2014; World Health Organisation noise guidelines, and the EPA guidance note for noise: NG4 Guidelines. The noise impact assessment included attended noise measurements on the proposed development lands. This included measurements of background noise at the noise sensitive locations. The findings of the noise assessment confirm the modelled noise levels (free field façade noise levels) are below the recommended EPA/WHO/BS8233 guidelines.

The construction phase of development due to its nature is temporary and therefore any potential noise impacts will be short term. Again, compliance with all relevant has been demonstrated. As part of the final CEMP, a noise management plan will be prepared which will ensure that there is no exceedance of relevant British Standards Codes of practices such as: BS 5228-1: 1997 "Noise Control on Construction and Open Sites -Part 1"; BS 5228:2009 and AI:2014 "Code of practice for noise and vibration control on construction and open sites". The submitted Noise Impact Assessment confirms there will be no negative operational noise impacts on local receptors.

The potential for noise impacts as part of the collective solar farm project (including substation / grid connection), were also assessed under reference ACP-323402-25. We note that the An Coimisiún Pleanála inspector satisfied themselves that the proposed solar would not result in any significant noise impacts in the local environment:

"Having regard to the nature of the proposed development and its noise sources, the results of the Applicant's analysis and the separation distances provided between the inverters and the NSLs, I am satisfied that the operation of the proposed development will not result in significant noise impacts on surroundings properties".

HEATH AND SAFETY

The submission by Ciara McGrath and others highlights that there may be fire risks from the substations and fire suppression measures may be needed, as well as an emergency response plan. All substation assets are designed and certified to EirGrid standards, utilising approved plant and equipment only. The correct design, construction and commissioning by suitably competent and experienced personnel, in accordance with cross disciplinary technical standards and best practice guidance ensures the potential for fire is minimised. EirGrid have adopted emergency response policies and plans in place for all substation facilities as part of standard operating procedures.

Elsewhere, some health concerns area raised in relation to potential EMF / EMC impacts. This is addressed directly in the application through the submitted Planning and Environmental Statement (see Section 4.9) and Aglish Solar Farm Impact Assessment Report by AiBridges confirms that there will be no adverse EMF or EMC impacts in the local environment. Under reference ACP-323402-25, the inspector noted that:

> *"the EPA's EMF Guidelines indicates that there is no scientific evidence that exposure to low levels of EMF of any frequency causes damage to human health and that current scientific evidence does not support long-term health effects due to exposure to high or low frequency EMF. Given the nature of the proposed development and the analysis provided within the Applicant's assessment, adverse health impacts due to EMF are not anticipated to arise".*

AGRI PRODUCTION

It is submitted in some observations that the collective solar farm will take productive agricultural lands out of use and this should not be supported. In terms of land use, the proposed substation, as a component part of the solar farm, is wholly compatible with the agricultural use. The collective project represents a form of agricultural diversification which is consistent with the existing agricultural use, and that supported. There is no formal agricultural land classification system in Ireland or corresponding national, regional or local policy context which seeks to protect 'prime agricultural land' from renewable energy development. The land-take for the subject project is small in the context of the direct benefits it will bring to thousands of homes in Cork. As outlined in the submitted solar farm documentation, food production in the form of sheep grazing can be maintained as part of the operational development, and there is no basis to the claim (statutory or otherwise) that the project should be refused because it could constitute perceived misuse of 'prime agricultural land'.

TOURISM

Some of the community observations reference the potential impact of the proposed development on tourism throughout the local and wider landscape. As highlighted in the submitted LVIA baseline, the immediate areas to the substation / gird connection does not contain any of the key operational tourism assets, be it heritage features, golf, gardens, walking trails etc. The proposed substation is not in a designated High Value Landscape. There is existing transmission network infrastructure. It has been demonstrated through the LVIA process that the proposed development will not have any significant effects on local landscape character. It does not effect any designated scenic views. It is not considered that the proposed development will have any impact on tourism values within this part of County Cork.

ARCHAEOLOGY

The Third Party objections reference the Council's decision to refuse planning permission for Aglish Solar Farm as a basis to refuse the subject SID application. The position in relation to archaeological assessment, including requirements for pre-commencement geophysical survey and/or testing is set out in detail above. The Applicant approach is supported by precedent, including that on the recent solar farm application. We respectfully request that the Commission include a suitably worded planning condition to any decision to grant, consistent with this precedent, and the recommendations of the Department of Housing, Local Government and Heritage.

COMMUNITY ENGAGEMENT

It is submitted in some of the observations that appropriate community consultation was not undertaken for the project. We strongly refute those claims. Section 5 of the submitted Planning and Environmental Statement includes a summary of consultation undertaken for the project which included both the solar farm and the substation and grid connection, summary issues raised and how specific feedback from some third parties directly informed the design approach. We note that the level of consultation is highlighted and accepted by Cork County Council in their observation on the application.

PERCIEVED PROJECT SPLITTING

Anne and Tim Hallissey submits that advancing the application for the subject substation / gird connection distinct from the solar farms is not transparent and constitutes 'project splitting' and should not be supported. This is not substantiated. Where referenced in submissions, it is clear that the observers use of the term 'project splitting' relates to the making of more than one application for planning consent as opposed to referencing any requirement for Environmental Impact Assessment.

The requirement for a 'dual consent' process for such development is well established in the planning system and the Commission will note that statutory provisions necessitated that the applicant make a separate application for the substation / grid connection separate from the solar farms in the area. The context behind the making of this separate SID application is explained in the submitted Planning and Environmental Statement for the subject application. It was also explained in the Planning and Environmental Statement for the solar farm application. The Commission will also note, that in making the separate applications, a robust 'one-project' approach was adopted by the design team in the presentation and assessment of the separate solar farm and substation / grid connection components.

There are no procedural issues with the approach taken and all statutory provisions have been adhered to. This is fully consistent with legislative provisions and established precedent for An Coimisiún Pleanála's assessment of SID applications distinct from Section 34 applications for renewable energy generation made directly to Cork County Council in this case.

A couple of the submissions, including Dermot and Carmel Dineen, refer to the 'Environmental Impact Assessment' being flawed for the application. The comments that follow in their observation relate to the Ecological Impact Assessment. The requirements for an Environmental Impact Assessment Report has been screened out as part of the prepared EIA Screening, and consistent with precedent on such matters.

PERCIEVED LACK OF SOLAR FARM POLICY

A perceived absence of national policy on solar farm developments is referenced by some, including Bernie Cahill and Stephen Ewence, as having created a vacuum for 'speculative' development. We strongly disagree with this suggestion. The submitted Planning and Environmental Report includes a summary of the policy context which supports this application. A large number of policy documents exist which make explicit the Government's support for renewable energy development, and specifically, solar PV development. There is a clear policy basis in Cork County under the operative

Development Plan to objectively assess a planning application for a solar farm. A clear rationale was set out in the application in respect of developing the subject project at this location based on irradiance levels, route to market, and environmental suitability. We disagree strongly with any claims that there is an appropriate policy basis to consider solar farm applications in County Cork, or any insinuation that the subject project is 'speculative'. Projects of the subject nature are critical in the current climate and energy crisis, and the subject one has been prepared win full accordance with governing policy and industry guidance.

04. Conclusions

We welcome the opportunity afforded by An Coimisiún Pleanála to comment on the observations on this application. Based on a review of the comments contained therein, we respectfully consider that the observations do not raise any substantive issues which would preclude a grant of planning permission for the proposed development. It has been robustly demonstrated that the proposed substation and grid connection is compatible with national, regional and local planning policy. It has been demonstrated that the proposed substation / grid connection will not give rise to any adverse visual effects in the local environment in what is a highly anthropogenic landscape. Elsewhere, there will be no significant ecology, noise or archaeology impacts arising from the construction or operational phase of the substation / grid connection.

Cork County Council have confirmed their acceptance of the proposed development at the subject location. The single material matter raised in their observation, in which they request Further Information, relates to pre-decision archaeological geophysical survey and/or testing, which is consistent with their approach under Aglish Solar Farm, Cork County Council Reference 24/6157 / An Coimisiún Pleanála ACP-323402-25 refers. The Commission have adjudicated on this matter as part of their recent decision to grant permission, a decision which is supported by significant planning None of the prescribed bodies who observed on the application raise objections. Instead they recommend a number of conditions to be applied to any grant of permission, the majority of which relate to environmental commitments already made in the application documentation.

We respectfully submit that none of the community observations raise any material issues that would warrant a refusal of planning permission on this case. All of the principal points have been responded in full as part of this response. All environmental assessments completed for the project have been prepared in accordance with best practice with all assessment guidelines met. There are no material health and safety implications arsing from the proposed development. As noted, all construction phase activities will be proactively managed in accordance with a traffic management plan which will be agreed with Cork County Council. Commitments are in place to mitigate the potential for any impacts on local residents.

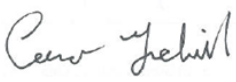
We are in the midst of climate and energy crisis as reflected in the significant scaling up of renewable energy targets and implementation in recent years under REPowerEU and RED III. The challenge is substantial, and the response requires strong leadership and immediate intervention. Should Ireland fail to achieve its climate and renewable energy targets, we are directly contributing to the rise in temperatures predicated by IPCC and to the global threat that this rise will impose on future generations. This scenario is very likely, if not definitive, and Ireland is set to fail to achieve its 2030 targets, having already failed to achieve its 2020 targets.

The delivery of renewable energy projects must be prioritised. The Board must consider its obligations under Regulation (EU) 2022/2577 and RED III to prioritise renewable energy projects and exercise its evaluative judgement and any discretionary powers in a manner consistent with the Climate Action Plan as required by Section 15 of the Climate Act. This is particularly relevant to Aglish Solar Farms and its associated substation and grid connection, where it has been demonstrated that the proposed development is located in an area where there is available grid capacity and the solar farm can output comparably higher electricity due to its siting in an area of high irradiance. The wider solar farm project can avoid the attrition rates which result in 40% of projects not progressing beyond planning and into construction/operation phases of development. The benefits of this in terms of wider 'post -planning' development viability in the context of grid connections and route to market should not be underestimated. There is a shortage of available grid capacity in Ireland and renewable energy projects with viable grid connections need to be prioritized as per statutory obligations.

Based on the foregoing, we respectfully request that An Coimisiún Pleanála grant planning permission for the proposed substation and associated underground grid connection infrastructure.

Please do not hesitate to contact us if you have any queries.

Yours sincerely



Conor Frehill
HW Planning

Enclosure

1. Landscape Response Statement by Macro Works

Landscape Response

In respect of an SID application

Aglish SID Substation (ACP-324102)

By Macro Works

May 2026

Introduction

This landscape response statement has been prepared in response to observations for an application for a 110kV AIS electricity substation and associated loop-in/loop out infrastructure, which is associated with the consented Aglish Solar Farm (ACP ref: 323402) in County Cork.

Statement of Qualifications

This Landscape and Visual Response Statement was prepared by Cian Doughan (BSLA, MILI) of Macro Works Ltd. Macro Works Ltd, is a specialist LVIA company with over 20 years of experience in the appraisal of effects from a variety of energy, infrastructure and commercial developments. Relevant experience includes LVIA work on over 200+ solar farm proposals throughout Ireland of varying scale, in addition to over 150+ wind farm developments including 10+ Strategic Infrastructure Development (SID) wind farms. Macro Works and its senior staff members are affiliated with the Irish Landscape Institute.

Existing Landscape Context and Review of Landscape Designations

The proposed Aglish SID Substation is located within a rolling rural agricultural landscape in the townlands of Aglish and Currahaly, south of the River Lee corridor in County Cork. The landscape is characterised predominantly by pastoral farmland enclosed by mature hedgerows, scattered trees and intermittent woodland blocks. Landform across the study area comprises rolling hills and shallow valleys influenced by the River Lee, which represents the principal landscape feature within the wider area and is located approximately 1.5 km north of the proposed development. The River Lee corridor provides the main focus of scenic, recreational and amenity value within the study area and includes features such as Farran Wood, the Coachford Greenway and the National Rowing Centre. Beyond this corridor, the surrounding landscape presents as a productive and working rural environment with dispersed farmsteads, local roads and agricultural land uses forming the prevailing landscape pattern. Additional anthropogenic influences include mineral extraction activities and transport infrastructure associated with the N22 corridor.

In landscape character terms, the proposed substation is located within LCT6a – Broad Fertile Lowland Valleys, identified in the Cork County Development Plan and Draft Cork Landscape Strategy as having ‘High’ landscape value, ‘High’ landscape sensitivity and ‘County’ level importance. The wider consented Aglish Solar Farm extends into LCT8 – Hilly River and Reservoir Valleys, which carries ‘National’ level importance and encompasses the more visually sensitive River Lee corridor. The proposed substation itself is located outside the mapped High Value Landscape (HVL) designation, which is principally associated with the River Lee Valley and surrounding elevated lands. Within the 5 km study area, visual designations are limited to two scenic routes, namely Scenic Route S37 (Leemount–Macroom via Coachford) and Scenic Route S38 (Classis–Curraghbeg–Coachford), both of which derive their scenic value from the River Lee corridor and associated valley landscapes. Overall, landscape and visual sensitivities are concentrated within the northern River Lee corridor, whilst the

immediate site context comprises a more enclosed and robust agricultural landscape with lower scenic susceptibility

Perceived Visual Effects and Representative Viewpoints Selection

The observations submitted suggest that the visual assessment understates the degree of visual change and that representative viewpoints were selected in a manner that does not fully reflect exposure experienced by local residents and road users, particularly along the L2204 corridor and within the immediate surroundings of Parcels 5 and 6 of the consented solar farm, which host the proposed substation and associated infrastructure.

In terms of the selection of the viewpoint locations for assessment, this is guided by the GLVIA3 (Guidelines for Landscape and Visual Impact Assessment). The viewpoint selection is undertaken utilising the ZTV (Zone of Theoretical Visibility) mapping, which provides the basis for selection of key viewpoints from which to study the visual and landscape impact of the proposed development in detail. It is not practical to include every single location that provides a view of the proposed development as this would result in an unwieldy report and make it difficult to draw out the key impacts arising. Instead, the assessors endeavoured to select a variety of location types that would provide views of the proposed development from different distances, different angles and different contexts. The locations selected are significant because they comprise, for example, centres of population and important routes whether due to traffic volume or their scenic value. Representative viewpoints are selected using the following categories;

- Key Views - from features of international or national importance;
- Amenity Views - from important heritage or amenity locations;
- Designated Scenic Routes and Views;
- Local Community Views;
- Centres of Population;
- and Major Routes.

It is important to note that some VPs may be applicable to several receptor categories, in which case, they will be assessed under the group that best reflects that location's particular sensitivities. Whilst every effort is made to select viewpoints with the clearest and most unimpeded view of the proposed development, in some instances, only a partial view of the proposed development will be visible from the nearest publicly accessible location that was selected to represent the visual receptor. In instances where the proposed development is heavily screened from a specific receptor, a photomontage has been included to highlight the degree of intervening screening afforded between the visual receptor and the proposed development. Finally, it is important to note that Macro Works always attempts to use the most open views relative to the receptor being represented, whether these are views from a town or a designated scenic route. It serves no purpose to assess visual impacts from a location, which can be readily proven not to be representative of worst-case visual exposure from a particular receptor, as this only undermines the assessment.

The resulting assessment identified visual receptor sensitivities ranging from Medium to Medium-Low and concluded that residual visual effects ranged between Slight and Imperceptible. Importantly, visibility of the proposed development does not automatically equate to significant visual effects. Rather, visual assessment concerns the effects of change on views and visual amenity experienced by receptors (GLVIA3 Chapter 6), with significance determined through consideration of receptor sensitivity and the magnitude and nature of change (GLVIA paras. 6.26–6.44). With regard to the surrounding site context, much of the local road network surrounding the site is enclosed by established and mature hedgerow vegetation and rolling topography. Consequently, views towards

the proposed development are frequently filtered, intermittent or partially screened in nature rather than forming broad open panoramas. Indeed, this existing containment considerably limits the visual effects generated by the proposed substation and associated infrastructure.

Overall, it was concluded that the proposed development would not generate significant visuals effects and instead, residual visual effects would be highly localised and would be of a lower order of effect. It should also be noted that with regard to the consented solar farm, which also assesses the effects generated by the proposed substation as part of a 'one project approach', the senior planner concluded that "*it is considered that the development will have a localised impact but will not unduly impact on the character of the wider area*".

Particular emphasis from some submissions are placed on effects arising at nearby residential receptors and the contention that the proposal would permanently alter existing views and introduce an overbearing industrial influence within the surrounding rural environment. The submitted LVIA considers residential visual amenity through the use of representative viewpoints representing the surrounding local community and residential receptors. Viewpoints are selected to represent views afforded from surrounding receptors and by local community receptors travelling through the surrounding landscape. Whilst representative viewpoints are included to represent surrounding local community receptors, it is not possible to represent views from upper floor windows of nearby dwellings. Several references are included with regard to dwellings to the north of the substation and proposed grid connection infrastructure. These dwellings are located along locally elevated lands and have the potential to afford broader views across the proposed development, but principally from their first floor windows. Nevertheless, the substation compound is well offset from these dwellings, situated along a land parcel over c. 400m to the south of these receptors. It should also be noted that the principal aspect of visual amenity afforded from these dwellings relates to views to the north across the wider Lee Valley and distant rolling hills and upland areas, in the opposite direction to the proposed development.

In this instance, the proposed development benefits from extensive visual containment generated by retained hedgerow boundaries, rolling topography and layers vegetation surrounding the site, which will be supplemented by the comprehensive landscape mitigation measures. The substation compound itself occupies a relatively modest footprint within the wider landscape context and the lower built elements remain screened in many local views. The interface towers comprise slender structures and do not present as visually dominant features across the wider study area, and a viewed in the context of the existing overhead cable corridors that traverse the study area. As a result, the development generates localised changes in views rather than widespread alteration of visual amenity or surrounding prevailing landscape character. It is also important to recognise that where more notable visual effects were identified within the wider consented solar farm assessment these related principally to visibility of solar infrastructure rather than the SID substation itself. In many views the substation contributes only a limited proportion of the overall visible development, with residual effects highly localised to its immediate surroundings.

With regard to the submission provided by Cork County Council (CCC) concerning the LVIA for the proposed development, the Council states that "*the site is in a relatively unspoilt area in this part of County Cork*". This characterisation is not considered to accurately reflect the landscape context of the site and its surroundings. Whilst development levels within the site and its immediate vicinity are relatively limited, the receiving environment is nonetheless a working rural landscape characterised by pastoral farmland, working farmsteads and associated agricultural infrastructure. Thus, this is not an unspoilt landscape, but rather a typical rural landscape that is representative of many parts of County Cork and rural Ireland generally. Indeed, whilst a degree of visual containment is afforded by the surrounding landform and vegetation, it is precisely this contained landscape context that

contributes to the capacity of the receiving landscape to accommodate the proposed development. This is reflected in the Planning Authority's own observation that "*the proposed substation itself would only be visible very locally in its immediate vicinity, in views from the L2204*".

With regard to visual effects, CCC further states that "*it is the Planning Authority's opinion that the potential visual impact of the proposed SID, particularly the substation, will have a higher magnitude and a greater significance than the LVIA finds*". However, the assessment does not understate the nature of the visual effects arising from the proposed development. The LVIA identifies a High-Medium pre-mitigation magnitude of visual effect, recognising that the proposed substation and the consented solar farm development, both of which form part of the same overall development context, will result in a "*marked degree of visual change*" and will "*increase the intensity of development along this section of the local road that is currently influenced by little other built features*". Notwithstanding this, visibility of the proposed development from the L2204 is confined to a relatively short section of the road corridor and will be experienced only briefly by road users. Furthermore, the proposed mitigation planting, which forms part of the consented solar farm development, will progressively establish and mature over time, noticeably increasing the screening effect provided by the existing roadside hedgerow network. Once established, this vegetation will heavily screen both the proposed substation and the consented solar farm from the surrounding local road context. Whilst the establishment of the mitigation planting will increase the degree of enclosure experienced along this section of road, such enclosure is entirely characteristic of the local landscape. Roads bounded and enclosed by mature hedgerows are a common feature of the rural landscape of County Cork, and thus, the mitigation planting will not appear out of place. As a consequence, the residual magnitude of visual effect following the establishment of mitigation is appropriately assessed as Low, with a corresponding residual significance of visual effect of Slight.

Overall, it is considered that the visual effects associated with the proposed substation and the consented solar farm have been robustly and proportionately assessed. The LVIA fully acknowledges the marked visual change that will occur prior to the establishment of mitigation, whilst also recognising the substantial screening benefits that will arise as mitigation planting matures. Overall, it is not considered that the assessment underestimates or underplays the likely visual effects of the development, as suggested by the Planning Authority.

Landscape Mitigation Strategy

The observations also question the effectiveness of proposed landscape mitigation measures and suggest that new planting will require many years to establish and therefore cannot sufficiently mitigate visual effects. The submitted mitigation strategy extends beyond simple replacement planting and is instead aims to retain and enhance of the existing landscape framework. The principal mitigation approach involves protection of existing hedgerows together with hedgerow enhancement, bolstering planting and supplementary native species establishment. Consequently, mitigation does not seek to create screening where none presently exists but instead reinforces an already well established networks of hedgerow vegetation.

The submitted landscape proposals also incorporate early-stage planting undertaken from commencement of the construction phase such that vegetation establishment occurs during project delivery rather than after completion. As noted within the submitted landscape plans, mitigation planting would therefore benefit from multiple growing seasons prior to completion of the wider works, allowing screening measures to become partially established during construction itself .

Furthermore, the submitted photomontages already incorporate the proposed mitigation scenario and therefore do not represent an unmitigated condition. It is therefore considered that the

observations do not fully reflect either the existing degree of screening already present within the landscape or the extent of the proposed mitigation measures

Summary

Having reviewed the observations submitted, it is considered that the landscape and visual concerns raised principally relate to perceived visibility and broader concerns regarding the wider solar development rather than significant residual effects generated by the SID substation itself. The submitted LVIA adopted an accepted GLVIA3 methodology, incorporated representative viewpoints, which account for residential receptors, considered cumulative interaction with the associated consented solar development as a 'one project approach' and included comprehensive mitigation proposals and photomontages illustrating the established mitigated scenario, along with the pre-mitigation views.

Whilst the proposed development introduces additional built infrastructure into the immediate agricultural setting, the proposed substation remains relatively contained with effects limited to its immediate surrounds, benefits from extensive existing vegetation screening and incorporates a comprehensive landscape mitigation strategy. In this regard, residual visual effects were assessed as ranging from Slight to Imperceptible and no significant residual landscape or visual effects were identified within the submitted assessment.

Overall, it is not considered that the observations identify any material deficiency in the submitted LVIA nor demonstrate landscape or visual effects beyond those already assessed within the application documentation.