Brian Westlake &
Sinéad Fitzgerald
Knocknagappagh,
Killeagh,
Co. Cork
P36W275

03rd November 2026

The Secretary,
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902

Planning Application Reference Number: VA04.324632

Applicant: Perigus Energy Ireland Midco Ltd.

Description of Development:

Proposed development of a 220kV Air Insulated Substation (AIS) and Loop-in Grid Connection at Greenhills Solar Farm. Located in the townlands of Ballyneague, Ballydaniel, Knocknagappagh, County Cork.

Dear Sir/ Madam,

We refer to the above planning application and wish to make the following submission in relation to the development. I ask that An Coimisiún **invalidate or refuse** this development as the **application is premature, key information is missing** from the planning documentation and **the site is unsuitable** for the proposed development.

We also enclose the content of a submission made to Cork County Council (by Brian Westlake) for the associated solar farm proposal. We ask that An Coimisiún Pleanála consider this when judging this application.

1.0 Premature Application:

The site notice states that: *'A separate planning application has been submitted to Cork County Council for the proposed Greenhills Renewable Energy Park in the townlands of Knocknagappagh, Barnaviddane, Ballyneague, Ballydaniel, Youghalpark, Ballydaheen and Cornaveigh, Co. Cork.'*

There is currently no live planning application with Cork County Council for the 'Greenhills Renewable Energy Park'. Therefore, the public notice is misleading to the public. It is premature to consider the substation application without a valid planning application (or decision) for the solar farm project which relies on this proposed substation. The planning application sequencing is flawed.

2.0 Omission of Key Information

2.1 Insufficient Public Notices:

Four site notices have been provided all in a narrow field of view to the northwest of the proposed substation. The closest of these site notices is approximately **900m** from the proposed substation compound.

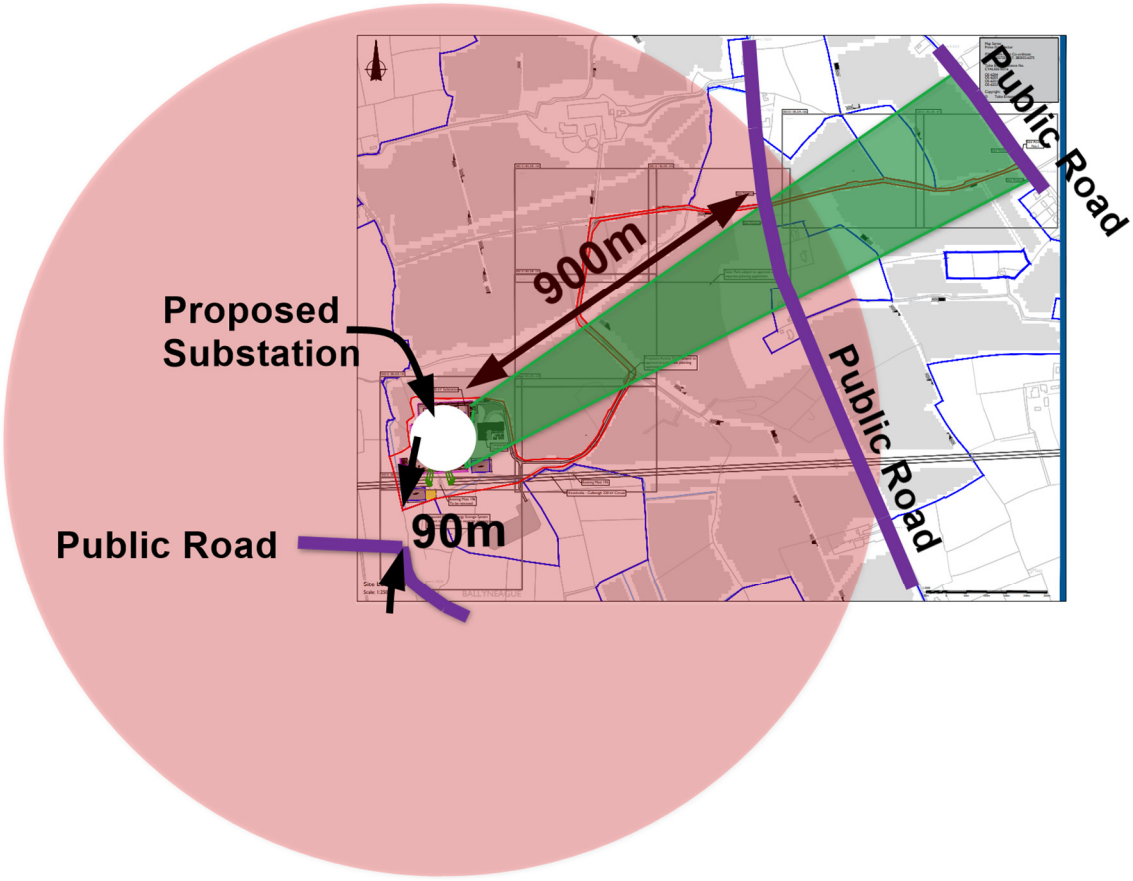

Figure 1: Proposed Substation Location, Public Roads and Site Notices

There is a public road approx. **90m** from the southwest corner of the site. The applicant has not provided site notices in this area. The application does not adequately inform those who will be closest to the substation of this planning application – the closest site notice is a 40minute walk (via public road) from the area where the substation is proposed. As such I consider the provision of site notices to be insufficient.

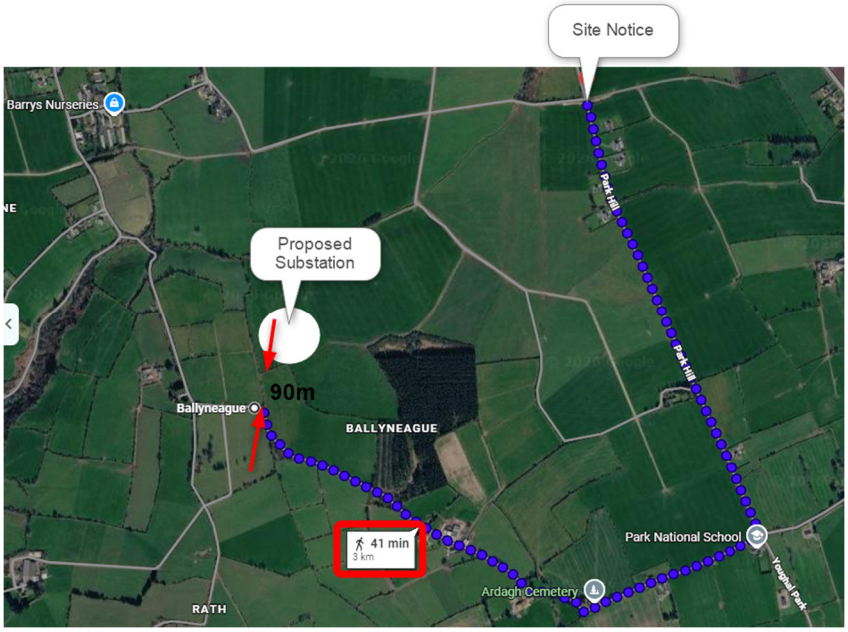

Figure 2: Map showing walking route to Site Notice from the closest Public Road to the proposed Substation

Site notices are not erected at each entrance to the site – as an example, we live at P36W275. There is an existing entrance to the site, from the public road adjacent to our property. The lack of a site notice in this location has hampered our statutory right to comment on this application. The closest site notice is a 49minute walk from our house.

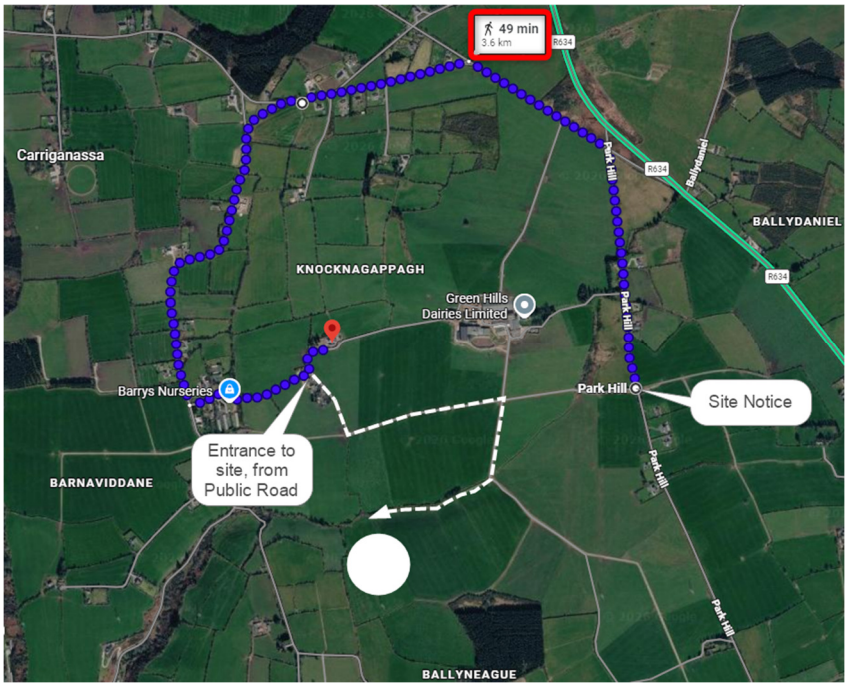

Figure 3: Map showing entrance to site from public road where no site notice is provided. Walking route from our property to the closest public notice indicated

2.2 Lack of clarity:

The site notice describes part of the proposal '*...provision of new internal site access road with a site entrance off the R634...*' It does not refer to the L-7829 Public Road which intersects the red line boundary.

Drawing 300101185-DR-105 provides no clarity in relation to the applicant's proposal for crossing the L-7829. It is unclear how the area will be secured, how sightlines would be achieved, how are these entrances managed, can vehicles pull in off the public road while gates are being opened, how is surface water run off drained etc. The drawing provides no levels or cross sections; how will the crossing be achieved? Will an overpass or underpass be provided? There is an existing agricultural underpass in this area – it is not indicated on the drawing. Information is frustratingly sparce on this drawing.

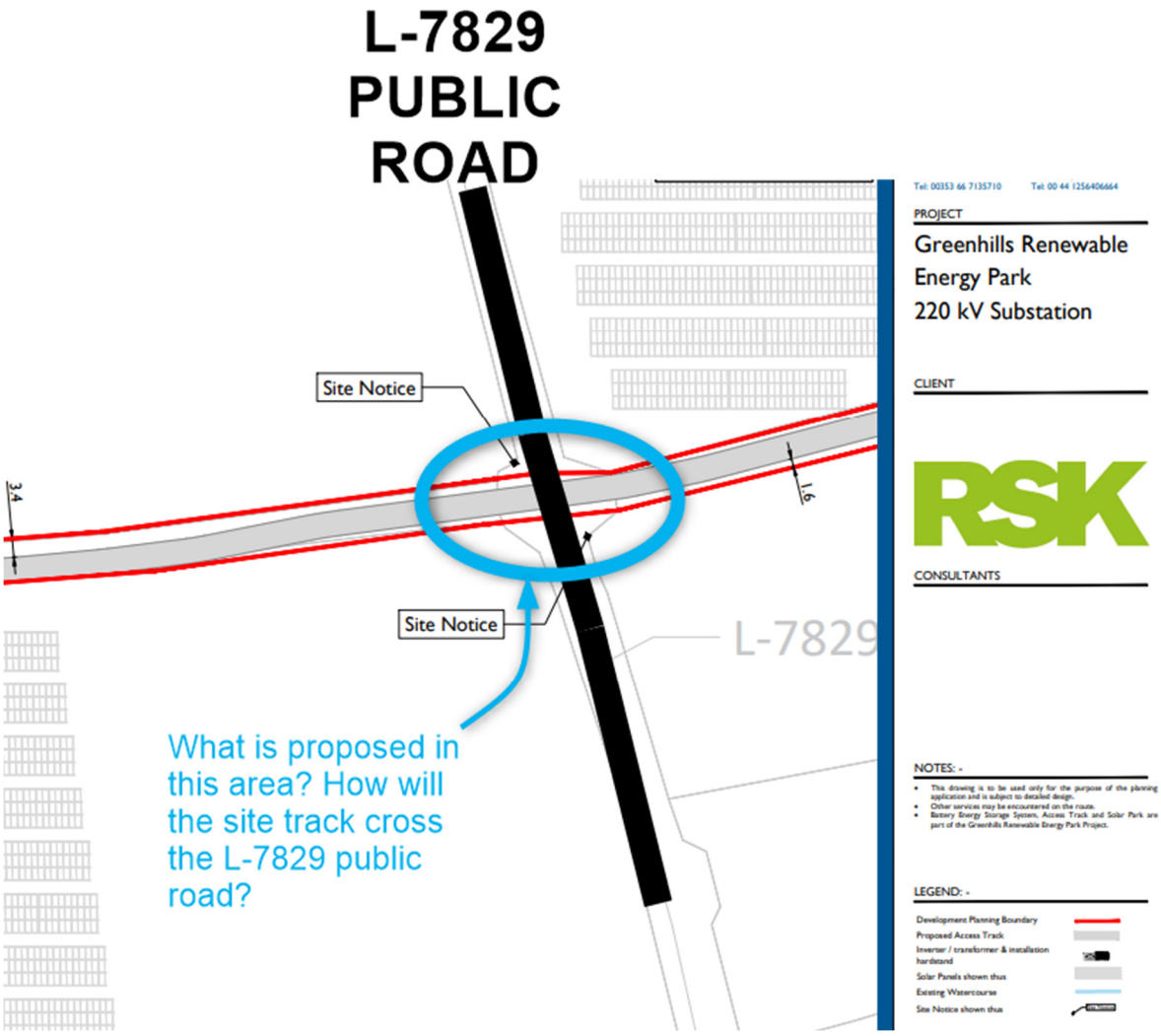

Figure 4: Extract from 300101185-DR-105, highlighting lack of information relating to proposed road crossing point

2.3 Misleading photomontages:

By way of example, I highlight photomontage VP7b. The 'Established Mitigation' image shows a tall, dense, established hedgerow at the main entrance to the site (off the R634).



Figure 5: VP7b - Indicating 'missing' site entrance

The author of the photomontage has produced a highly misleading image. The mitigation measures appear to be so effective, that they appear to have made the main entrance to the development disappear!

2.4 Site layout drawings lack basic information:
The following comments reference drawing: 300101185-DR-105

- Existing Levels not provided
- Proposed Levels not provided
- Existing adjacent structures not shown
- Public road not clearly labelled
- Existing adjacent bored wells not indicated
- Existing adjacent septic tanks/ percolation areas not indicated
- Existing overhead cables not indicated
- Existing gates not indicated
- Proposed Gates/ Fences not indicated
- Proposed track surface not indicated
- Proposed surface water drainage not provided
- Demonstration of sightlines not provided
- Blue line boundary not indicated
- Existing watercourse partially shown

Basic planning application requirements are missing. It is unfair to the community that the application lacks clarity and I ask that An Coimisiún Pleanála invalidate/ refuse this application based on the above.

3.0 Unsuitable site:

The proposal is located along the Knockraha-Cullenagh 220kV overhead line. The applicant has not provided a justification for the selection of this site. It appears that the application is driven by land availability, rather than proper planning consideration. I consider that there are more suitable sites for renewable energy developments along this line.

The proposed site sits within a rare, expansive open area of approximately 1.14km² / 280 acres.

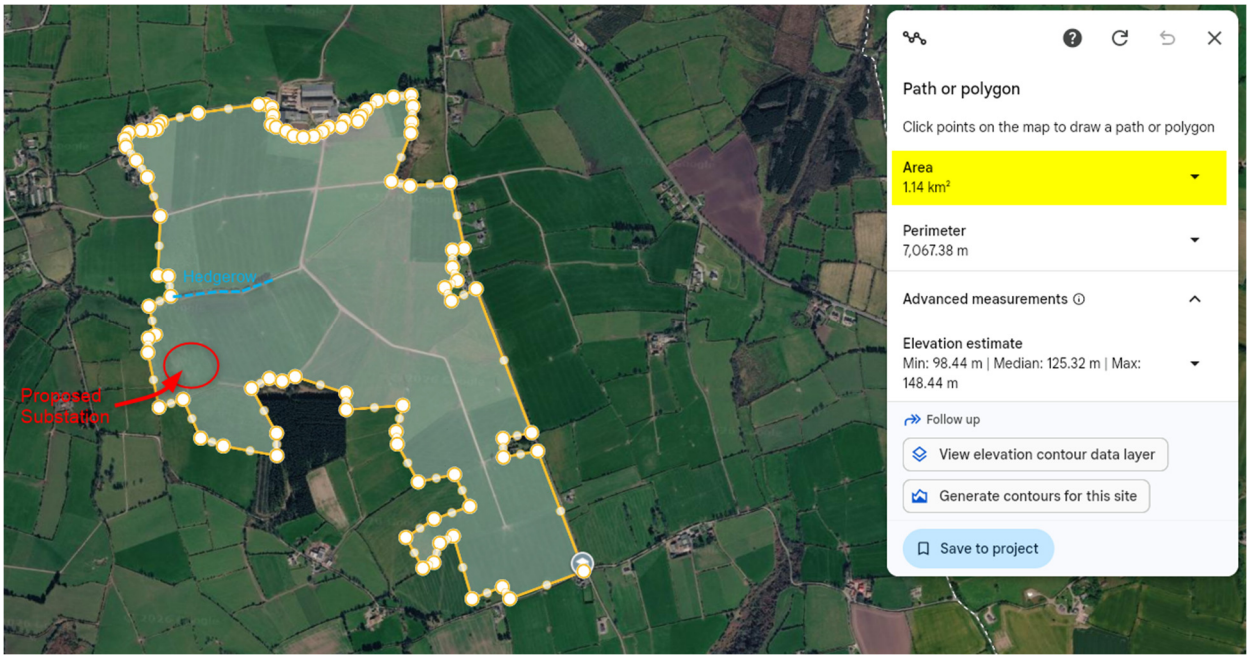

Figure 6: Aerial Image showing vast open 280 acre open land tract, where Substation proposal is made

The chosen site is fundamentally unsuitable for an industrial substation development of this scale, primarily due to its severe and irreversible impact on the local landscape character.

Introducing an industrial substation into this unbroken landscape will create a visual blight that cannot be effectively mitigated or screened. Airbourne acoustic nuisance will be amplified by the lack of established screening.

This proposal sits on lands which completely disregard the established field patterns and spatial context of the local area. The land across this area typically comprises agricultural fields of less than 20 acres in size.

The local area is defined by this smaller, historic field pattern. Developing an industrial substation and solar farm within a 280-acre open plot will:

- Shatter the local landscape character: The scale of the substation is entirely mismatched with the traditional agricultural field network that defines our community.
- Set a dangerous planning precedent: Allowing industrial developments to swallow vast open tracts threatens the preservation of neighbouring agricultural lands and rural communities.

- Cause disproportionate environmental and visual harm: Because the site sits within such a wide, open expanse, the industrial infrastructure would be visually incongruous with the area and highly visible from great distances.

Developments of this nature should be restricted to brownfield sites or areas already allocated for industrial use, rather than fragmenting and industrialising a prominent agricultural landscape.

The proposal is located near the Blackwater Estuary Special Protection Area (Site Code 004028). This proposal will negatively impact local rare bird populations, including Golden Plover, Lapwing, Dunlin, Curlew, Redshank, Wigeon, Peregrine Falcon, Buzzard, Woodpecker, Osprey, White Tailed Eagle.

The proposed site is prominent and is highly visible in the locality. This will exacerbate property devaluation in the locality. Compensation measures are not in place.



Figure 7: Prominence of site as seen from Meenoughter townland



Figure 8: Prominence of site as seen from Knocknagappagh townland



Figure 9: Prominence of site as seen from Ballydaniel townland

I urge the planning authority to recognise the severe incompatibility of the proposal and this site and refuse permission for this proposal. Thank you for considering this.

Kind Regards,

Brian Westlake & Sinéad Fitzgerald

APPENDIX

Below is the submission made by Brian Westlake on Cork County Council Planning Application Reference 26/2133. This application was for the proposed solar farm associated with this substation. Application reference was invalidated by Cork County Council.

I enclose this as the content is directly related to the substation proposal, and I ask that An Coimisiún Pleanála take this into account when judging ACP file reference VA04.324632.

Submission to Cork County Council on file reference 26/2133

The content of this submission is summarised as follows:

1. Planning application validation issues
2. Scale and Siting concerns
3. Residential Amenity Issues
4. Community Amenity Issues
5. Community Engagement
6. Precedent for Refusal
7. Quality of Information submitted

1. PLANNING APPLICATION VALIDATION ISSUES

Site Notices

Site notices have been erected in incorrect locations. I am aware that site notices have been erected on lands which do not form part of this application on the following roads; L-7806-51, L-7829-0, L3803-0. In some instances, these site notices are located on the wrong side of the road. This is verified by the site notice monitoring report submitted as part of the application. I have not seen letters of consent from the relevant landowners, and I am aware that this issue has caused distress to landowners impacted. This is unfair and misleading to the public.

In addition, site notices are not erected at all entrances from public roads, as per Cork County Councils Directions for erecting Site Notice.

- The site notice must be securely erected or fixed in a conspicuous position on or near the main entrance to the land or structure concerned from a public road, or where there is more than one entrance from public roads, on or near **all such entrances**, or on any other part of the land or structure adjoining a public road, so as to be easily visible and legible by persons using the public road, and shall not be obscured or concealed at any time.
- Where the land or structure to which a planning application relates **does not adjoin a public road**, a site notice shall be erected or **fixed in a conspicuous position on the land or structure** so as to be easily visible and legible by persons outside the land or structure, and shall **not be obscured or concealed at any time**. **The notice should not be affixed to a gate under any circumstances.**

IT SHOULD BE NOTED THAT FAILURE TO COMPLY WITH ANY OR ALL OF THE ABOVE WILL RENDER THE APPLICATION INVALID.

Figure 1: Extract from Cork County Councils Guidelines for erecting site notices

There are locations where parcels of land included in the application drawings do not have any site notices erected. This is unfair and misleading to the public. See below example in Knocknagappagh:

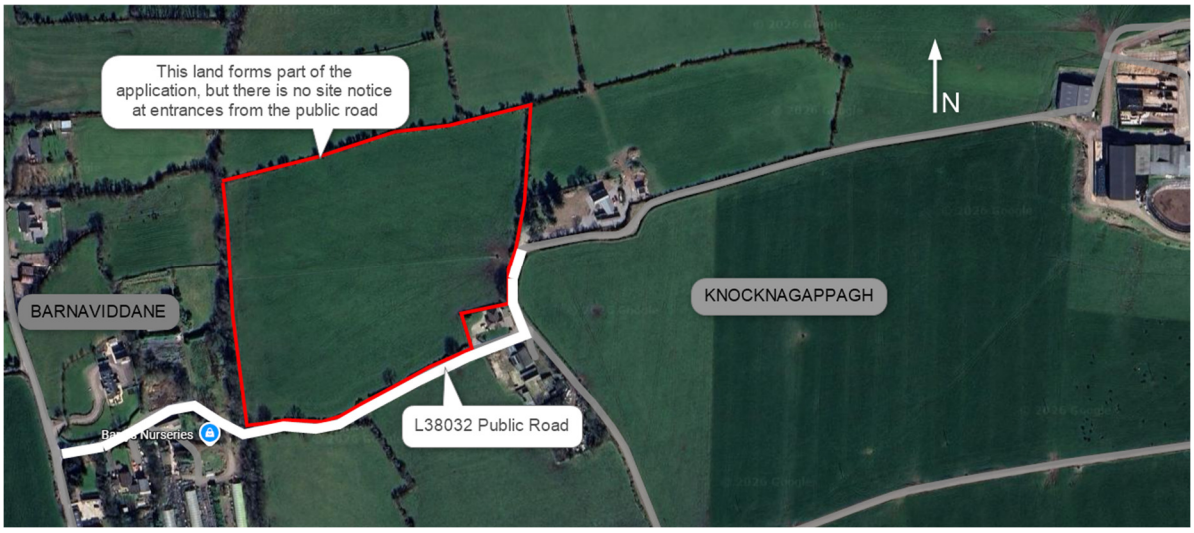

Figure 2: Lands at Knocknagappagh, where no site notice has been provided at entrances from public road L38032.

Existing Upgraded Tracks

I note that site layout drawings refer to 'Existing upgraded track' across the proposal. I have been unable to locate drawings to indicate what is proposed. Furthermore, it is not noted if planning for the retention of such tracks and their associated access points is being sought.

Existing Features

The application drawings (including site plan drawing 7353- PL-DR-104) do not accurately reflect the buildings, septic tank and percolation area, bored well or significant tree stands on our property, or other properties, which adjoins the site to which this application relates.

I am concerned that drawings provided do not appear to reflect on the ground topographical conditions on the site, or on adjoining lands. This is also noted in section 7 of this submission.

Site Plan Drawings

Site Plan drawings are noted as being at a scale of 1:1000. This is not in line with the standard requirement for 1:500 scale site plan drawings.

Works proposed outside of the red line boundary

See below extract from drawing 7353- PL-DR-106, which shows a proposed entrance outside of the red line boundary for this application.

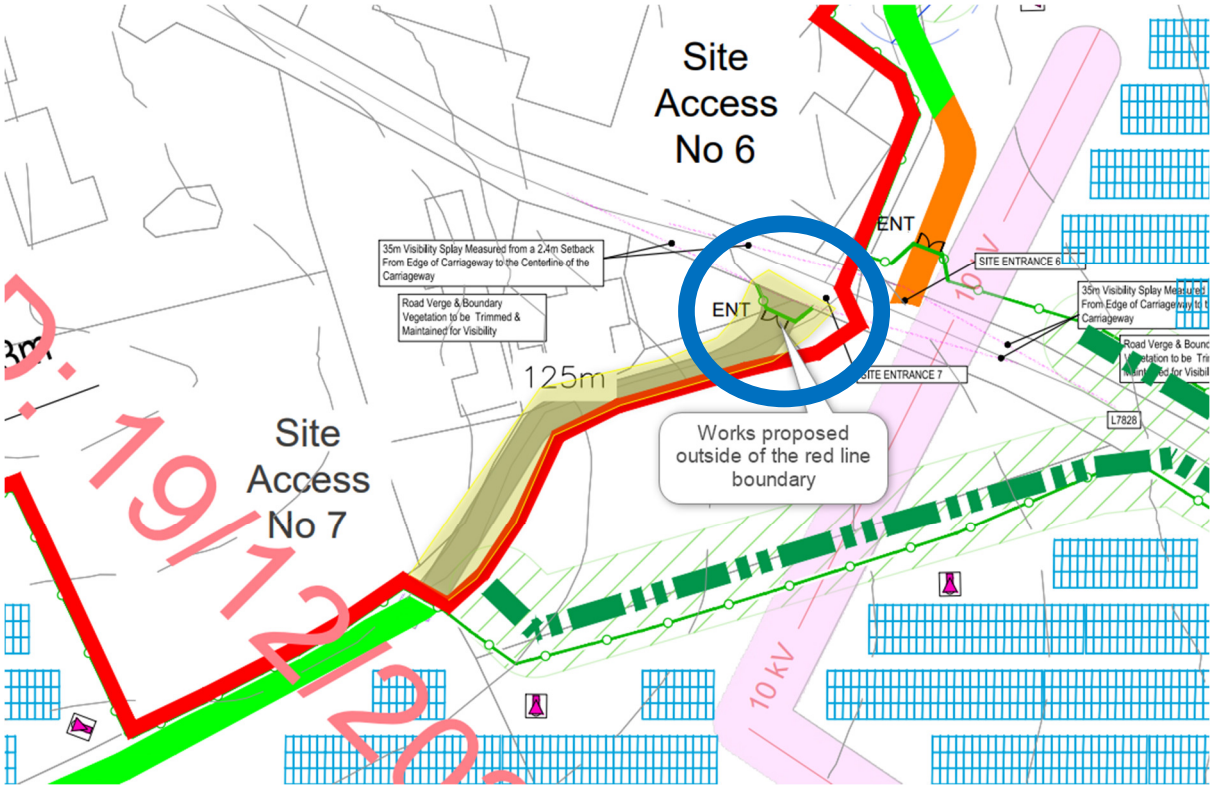

Figure 3: Proposed works outside red line boundary (circled in blue) indicated on extract from 7353- PL-DR-106

Spoil Storage

The planning description includes *'The provision of 1 no. temporary spoil storage area'*. I have been unable to locate this on the application drawings. It is highly unlikely that a single temporary spoil storage area would suffice for a development spanning 323.28 Hectares.

Previous Application Invalidation

Cork County Council invalidated a previous application for this development (File reference 25/6876).

Having reviewed the reasons for this invalidation and the applicant's response, I consider that the applicant has failed to fully address the issues raised.

- The Archaeological and Cultural Heritage assessment is incomplete
- The Noise assessment queries inadequately addressed
- No images provided to show the cumulative impact with the nearby permitted windfarm
- Site Notice provision not compliant with Article 8 of S.I. No. 685/2006 Planning and Development Regulations 2006, section 19 – Site notices missing at some site entrances. Some are erected on lands which do not appear to form part of the application.

2. SCALE AND SITING CONCERNS

I understand that this proposal is for the largest solar electricity production facility in Ireland. At present, there are no national planning guidelines for the development of solar electricity production facilities. I believe that it is premature to grant planning for such a large-scale development in the absence of national planning guidance.

The proposed area of solar panels concentrated in such a small area is too big, it is too dense, and it imposes a disproportionate burden on the local community, particularly due to the proximity to the nearby permitted Lyrenacarriga wind farm. It will be visually incongruous with the existing rural character of the area, which is in close proximity to the S45 scenic route. It appears that the proposed development would be unsympathetically imposed on its surrounding landscape in and it would scar the landscape. As the name 'Greenhills' suggests, parts of the site are elevated, exposed and prominent in the locality, to grant permission would set a poor precedent for future development.

I believe the proposal does not meet County Development Plan Objective GI14-9.

The '*Greenhills'* proposal spans multiple hills and valleys, it is not *'relatively flat'* as described in Section 1.3 of the Planning and Environmental report.

The site is located near the S45 scenic route in the townlands of Knocknagappagh and Ballydaniel. The route offers vast views of the rolling rural landscape. Section 1.7 Conclusion of the Landscaping and Visual Assessment appears dismissive of the merits of the scenic route, stating that *'Scenic Route S45, does not exhibit any particularly distinctive sense of scenic amenity'.* If this were true, the route would not be designated as a scenic route.

I have serious concerns about the accuracy of the Viewpoints taken as part of the Landscaping and Visual Impact Assessment. As an example, see below VP3a, I have measured the existing signpost, seen in the image, at c. 2.6m high. The image shows dense planting, over 5m tall.



Figure 4: VP3a extract

The Landscape Mitigation Plan – Sheet 1 (LD.GRNHLLS 1.1), with the same consultant branding as the Viewpoint VP3a, shows Hedgerow Type 1 in this area. The below elevation (Figure 5) shows this type of hedgerow. It is significantly different from the representation provided in VP3a, showing much of the planting as 3m high, and raises concerns about the accuracy of all viewpoints images provided. The taller vegetation is noted as being existing – there is no existing vegetation in this area which exceeds 3meters in height. A 3m high hedge will not adequately screen the proposal as VP3a suggests.

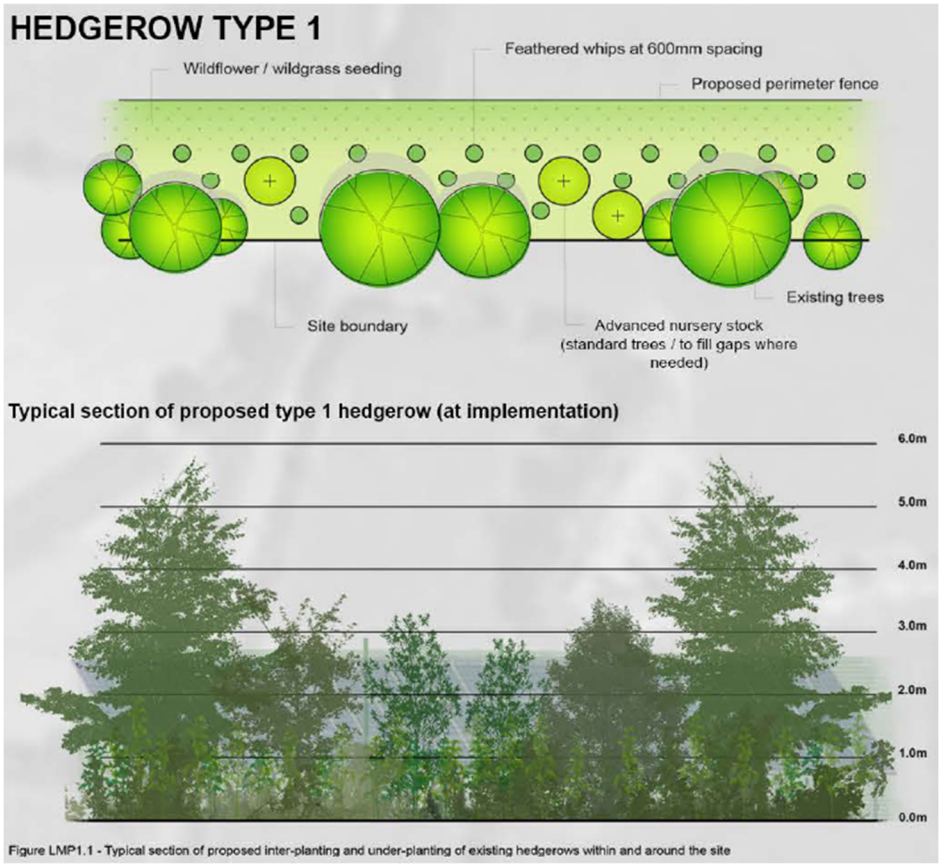

Figure 5: Extract from drawing LD.GRNHLLS 1.1 showing hedgerow type 1

Section 1.5 of the Landscape & Visual Impact Assessment states that, *'planting will be allowed to mature up to a maintained height of 3-4m'*. This statement appears to further undermine the accuracy of the viewpoints submitted.

There is a prominent hill within the site, in the townland of Knocknagappagh. It appears that a level of consideration has been given to the impact of the proposal on this hill to the scenic route in the area highlighted in Figure 6.

The south/ west sides of this hill is perhaps more prominent locally, being visible from many neighbouring townlands and houses to the south and west. Solar panels are not appropriate at this part of the site.

It appears that the visual impact of this proposal attempts to be more sympathetic to passing motorists on the Youghal to Tallow Road than residents of the community.

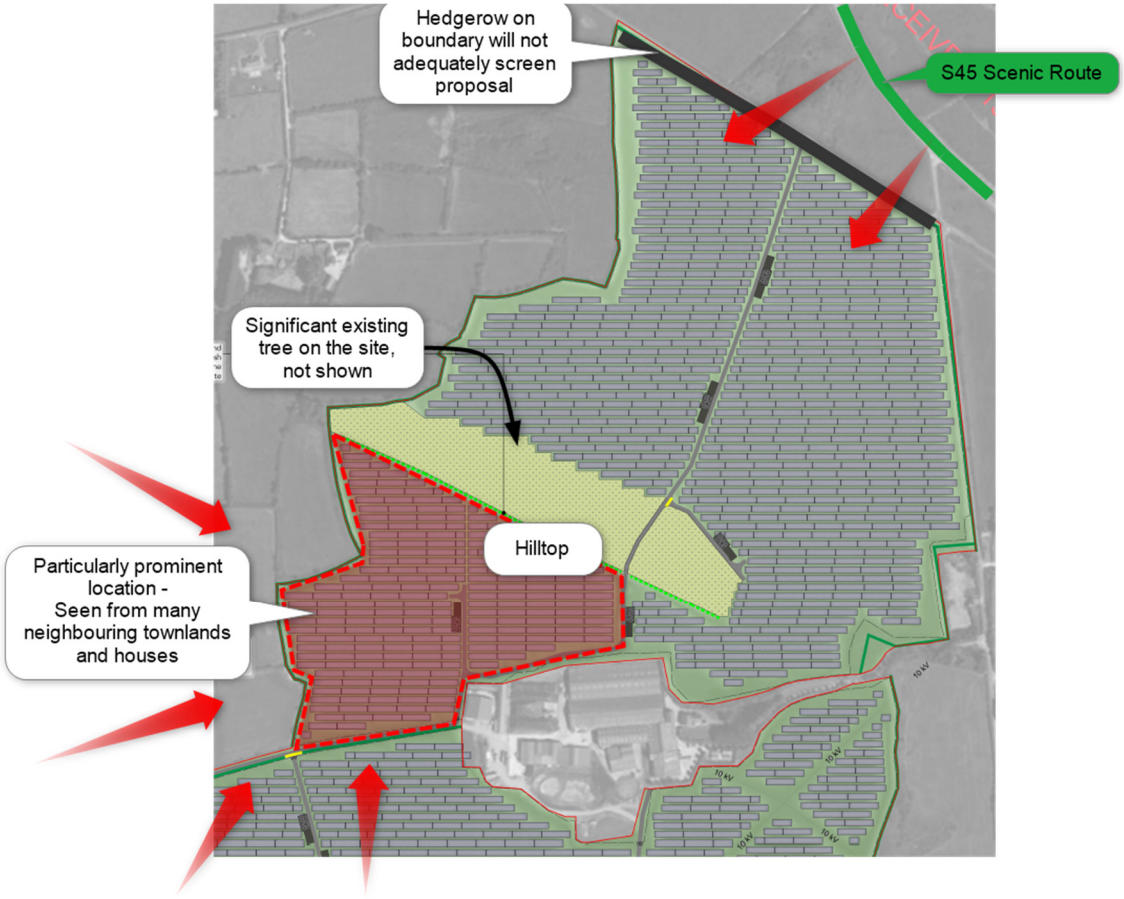

Figure 6: Mark up of Landscape Mitigation Plan - Sheet 1 DWG No LD.GRNHLLS 1.1, highlighting issues/ concerns

Cork County Council's 'Cork Rural Design Guide' document sets out the importance of achieving a high standard of design for new houses. The principles outlined in this document should be applied to all developments in rural areas.

It is difficult to understand why one-off houses should achieve the high standards required by this document, but it might be acceptable to litter the countryside with hundreds of acres of solar panel arrays and metal shipping containers to house batteries and inverters/ transfers. I am unable to find any design merits of this proposal. There are no aesthetic merits to this proposal.

3. RESIDENTIAL AMENITY ISSUES

I live at P36W275 with my partner and our young children. Approximately 180 meters of our boundary is shared with the proposal.

I am concerned about the following impacts on my residential amenity:

Insufficient setbacks

Planning drawing 7353- PL-DR-104, shows that solar panels are proposed a mere 7.5m from our west boundary. Solar panels are proposed near our south boundary – From the drawings submitted they appear to be approximately 10-15meters at the closest point to our property. This would be overbearing and not consistent with the treatment of other residential properties.

In contrast, planning drawing 7353- PL-DR-109, shows solar panel set back dimensions of 87.8m to 100m from other residential boundaries. The topography of this area is similar to that adjoining our property. It is unclear to us why there is an inconsistent approach to set back design.

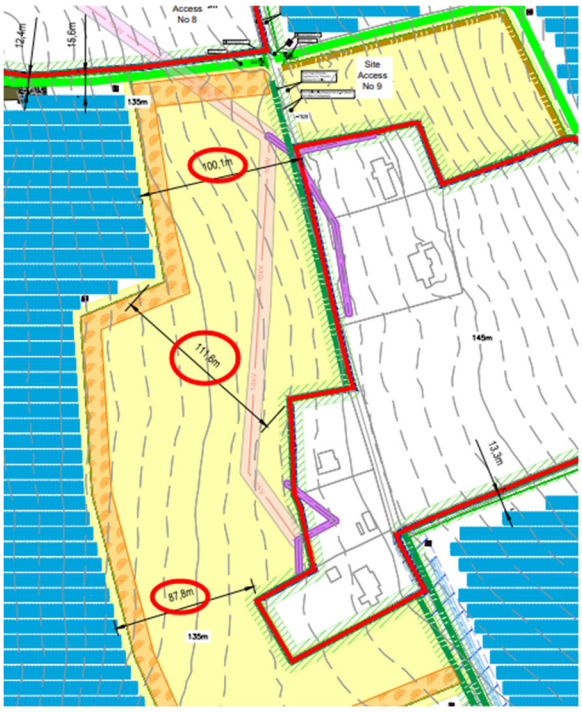

Figure 7: Set back dimensions from residential properties on L7829

For the avoidance of doubt, it should have been proposed that our property would receive the same set back treatment as the properties highlighted on the L7829 road (Circa 100m from the boundary).

Privacy

There are pole mounted CCTV points close to our property which could view our property. A CCTV field of view assessment has not been provided, without this, it is difficult to understand what exactly the applicant is proposing.

The application documents do not show the locations of existing pole mounted CCTV on the site. It is unclear if the existing pole mounted CCTV is related to this application or not, or if these require planning permission.

Glint and Glare

Figure 1.4 of the Glint and Glare Assessment notes *'similar levels of reflectance (to photovoltaic panels) emanating from wet road surfaces'*. I include a photo of sunlight reflectance from a wet

road surface in Barnaviddane. The area which the glare emanates from is relatively small, but a strong, uncomfortable effect is created. The vast area of solar panels would create extreme, irreversible glint and glare issues.



Figure 8: Glare from wet road surface in Barnaviddane

The glint and glare assessment confirms the following for our home (referred to as H61 in the Glint and Glare assessment):

- Our home is in an area with potential solar reflectance, within the categories below:

Receptor ID	Reflectance theoretically possible based on DTM topographic mapping (for control purposes)	Potential for impact after existing screening is taken into account (DSM)	Potential for impact after the proposed mitigation screening is taken into account (DSM)
H61	**Yes Potentially**	**Yes Potentially**	**Yes Potentially**

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Figure 9: Extract from Table 1-2, Glint and Glare Assessment

- Our residential amenity would be materially affected by glint and glare

Receptor	Pre-mitigation Magnitude of Effect	Post-mitigation establishment Magnitude of Effect

H61	Medium-low	Medium-low

Figure 10: Extract from Section 1.2.6.1, Glint and Glare Assessment

The above confirms that proposed mitigation measures have limited benefit for our property and thus verifying the imposing and overbearing nature of the proposal on our property.

I note that the glint and glare assessment is based on a height of 1.7m above ground level, data is not provided for two storey dwellings, like ours. We ask that an assessment be carried out at 4.7m above ground level, to represent a person's eye level about first floor level.

Section 1.2.7 of the glint and glare report concludes *'it is considered that there will be no significant nuisance effects generated from glint and glare towards surrounding dwellings as a result of the proposed solar farm.'*

Emphasis added to the word significant; in this context it is subjective and cannot be measured.

This confirms that our home will be subject to nuisance effects generated from glint and glare.

It is not good enough that the applicant did not consult with us on this matter prior to lodging a planning application.

Noise & Vibration

Our home is currently subject to noise nuisance effects arising from activities associated with part of this site. The noise and vibration impact assessment verifies that elevated sound levels are currently heard at BN3, arising from activities at the adjacent farm yard, particularly between the hours of 5am and 8pm. Accordingly, we wish to advise that the baseline noise levels are not a good reference to use – much of the noise arises from activities at an unauthorised development which recently sought permission for retention (planning file reference: 256948).

The report has assessed predicted noise levels for construction activity. Our home has been identified as Receptor 3 within Section 1.4.2.1. Our home has been identified as being most significantly impacted by construction phase noise.

It is not good enough that the applicant did not consult with us on this matter prior to lodging a planning application.

Table 1.27: Predicted Noise Levels During Construction Phase

Receptor ID	Predicted Noise Level for Construction Activity			
	Deliveries (dB $L_{Aeq,T}$)	General Construction (dB $L_{Aeq,T}$)	Trenching (dB $L_{Aeq,T}$)	Substation and BESS Construction (dB $L_{Aeq,T}$)

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3	**70**	**66**	36	37

Figure 11: Extract from submitted Noise and Vibration Impact, Table 1.28, Section 1.4.2.1.

The highest noise issue highlighted is during deliveries – it is unclear how/ where these deliveries will be made, or what internal haul routes will be used adjacent to our home. The applicant documents do not show an entrance near our home.

During the operation phase, noise from the proposed transformers is a major concern for our property. Before the application was lodged, Orsted (now Perigus) told us that they propose to use passive cooled inverters, and that these inverters are essentially silent.

Section 1.4.3.2 of the noise and vibration impact assessment notes inverters/ transformers as having a sound power level of 93 dB L_{WA}. I understand that this quite loud, similar to the noise of a petrol lawnmower. Petrol lawnmowers create considerable noise. We need to know that these would not be audible from our property.

The information provided on Figure 1.8 and Figure 1.9 of the noise and vibration impact assessment is insufficient to allow us to ascertain the acoustic impacts of the development in operation. Additional contours should be provided, rather than showing a wide 0-45dB(A) range. I understand 35dB(A) to be a more appropriate limit for undisturbed sleeping/ living. The contour maps do not appear to have factored in wind affects.

The list of mitigation measures proposed appear to do little in terms of reducing impact on residential amenity. A proactive approach would have committed to:

- Use of quiet, environmentally friendly, electric machinery instead of louder diesel engines during construction, operation and decommissioning.
- White noise reversing beepers on all plant.
- Attenuation measures around transformers.

Such measures would make a difference.

It has not been confirmed what activities will take place within existing farmyards. The cumulative impacts of these should be identified as part of this application.

Section 1.4.2.2 confirms that our home (with others) will be most impacted by vibration. It confirms *'potential significant impacts in terms of human perception of vibration are anticipated'*. This is extremely concerning to our Health and Safety.

The development description note that solar panels could be mounted on *'precast concrete solar panel footings, gabion basket or ballasted solutions'*. This design solution would reduce noise and vibration issues and we ask that the use of such a solution be a condition of planning.

It is not good enough that the applicant did not consult with us on this matter prior to lodging a planning application.

Construction activities

As the noise and vibration report confirmed, construction activities will have a significant impact on our residential amenity. Construction is also likely to raise significant airbourne dust, which is likely to cause health issues at our property. This would likely lead to issues ventilating our home and keeping things clean.

It is unclear how construction traffic would access the adjoining land to the west of our property – no entrance has been indicated from the public road. The application does not provide a proposal for this, meaning we cannot fairly comment on this aspect of the proposal.

It is unclear if/ how the applicant intends to utilise an existing gravel/ dust track to the south of our property. Refer to Section 7 where I provide comments/ queries on drawing 7375-PL-DR-104.

Silty surface water run off is a concern for the area around our property. Refer to Section 7, Item 23 of this submission

The construction programme indicates a construction duration of 21 months. This is not a legally binding programme, and the actual construction duration may take much longer.

Property Devaluation

The above negative impacts will devalue our property. The large scale nature of the proposal and our proximity to this proposal would exacerbate devaluation.

We raised the issue of compensation with the applicant prior to planning application submission. We are yet to receive feedback.

Furthermore, it would be much more difficult to sell our property, particularly during the construction phase.

Based on information provided by the applicant, we have no choice but to strongly oppose this proposal

4. COMMUNITY AMENITY ISSUES

Many of the issues raised within the 'Residential Amenity Issues' section will apply to others in the community. Within this section, I highlight some community amenity issues which this proposal will impact.

Road Access

Safe road access points have not been indicated to each parcel of land. For example, the parcel of land which I highlighted in Figure 2, opposite entrance number 11.

The nature of some of the access points poses potential safety concerns, based on my review of the Traffic Impact Assessment.

The acute nature of Site Entrance No. 3 poses a serious concern – Heavy Goods Vehicles exiting the site will not be able to see pedestrians, cyclists or traffic approaching from the north on the L3803. HGV's will not be able to exit the site without crossing over the middle of the road. Sightlines to the south are insufficient. A building and a tight dangerous corner immediately to the south of Site Entrance No 3 currently cause safety issues at this location. An existing roadside pumphouse at this location is missing from drawing 7353-PL-DR-101.



Figure 12: Existing Roadside pumphouse

A proactive approach would have sought to improve road safety in this location, instead of making it worse. This would be achieved by realigning the hedge on the west side of the L3803.

Site Entrances No 6 & 7 show insufficient 35m sightlines. The acute nature of site entrance 7 poses a safety concerns for left turning HGV's exiting the site. There appears to be works proposed outside of the red line boundary at this location.

Site Entrance 11 shows a limited 50m sightlines being achieved. This entrance is located on a blind corner. It will not be possible to see oncoming vehicles on approach to the entrance, due to the existing hedgerow on the north side of the L38032. A more proactive approach to road safety could have been taken around this entrance – a section of the existing hedgerow on the north side of the L38032 could be realigned.

In many locations it is proposed to trim/ maintain road verge/ boundary vegetation to achieve sightlines. There are locations where this would be necessary on third party lands, letters of agreement have not been provided with the application.

The Haul Route proposed to Entrance 6 & 7 is inappropriate due to existing road conditions including widths and gradients. HGV's would have issues negotiating the steep hills/ turns near the junction with the L3803. Section 1.4.1 describes this as a '*simple T junction*', this is incorrect due to its topography and dangerous corners.



Figure 13: Mark up of Traffic & Transport Figure 1.13 to include photos of dangerous/ challenging corner & junction

The haul route to entrance 6 & 7 is unsuitable – we ask that Cork County Council verify this on site.

Passing locations have been described in section 1.4.3. In relation to the L38032, it states that *'The L38032 can accommodate two-way construction traffic with minor upgrades to the existing passing bays in the road verge.'* See below image of an 'existing passing location' shown in section 1.4.3. I have highlighted lands which I understand to be private property – I have not seen a letter of agreement relating to upgrade works at this location, and it is not located within the red line boundary for this application.



Figure 14: Image taken from section 1.4.3. Private property highlighted

Vehicle tracking analysis should have carried out on all proposed passing points to demonstrate suitability. The road network is narrow and rural in nature and passing can currently be problematic.

I note that section 1.4.4 does not call for any opening up works such as cable laying works to the L38032. It is unclear how power would be connected to this part of the proposal.

Drawing 7353-PL-DR-102 shows a section of a public road being fenced off, see Figure 15 & 16 below. Cork County Council should ensure that this area is not fenced off. A more proactive approach from the applicant would restore this area as a public passageway, not fence it off.

I was unable to locate a letter of consent for Cork County Council for these works, or any other works on public roads.

I ask Cork County Council to take proactive steps to ensure this route is passable for the benefit of pedestrians, cyclists and equestrian pursuits.

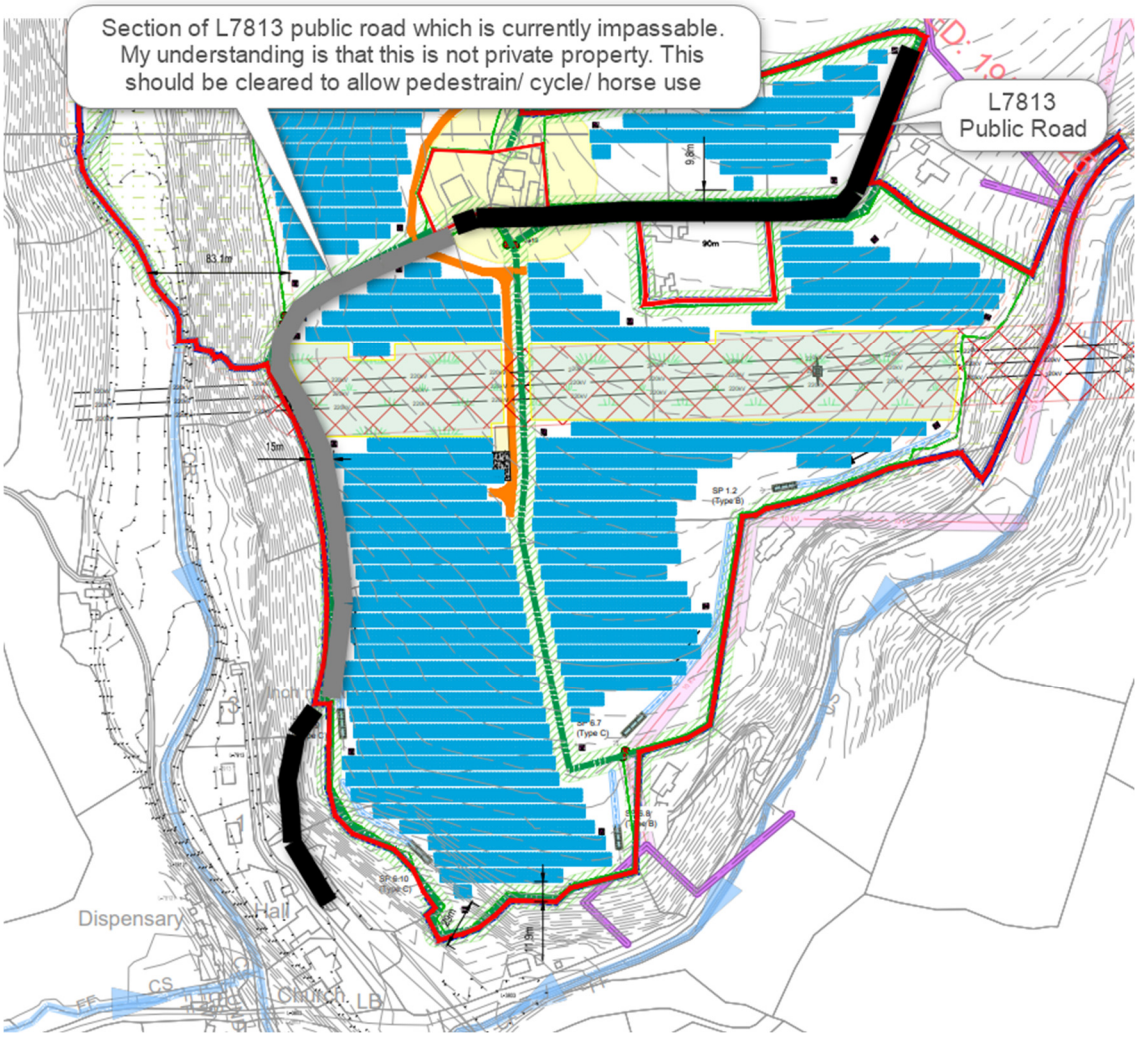

Figure 15: Extract from drawing 7353-pl-dr-102 highlighting L3713 Public Road

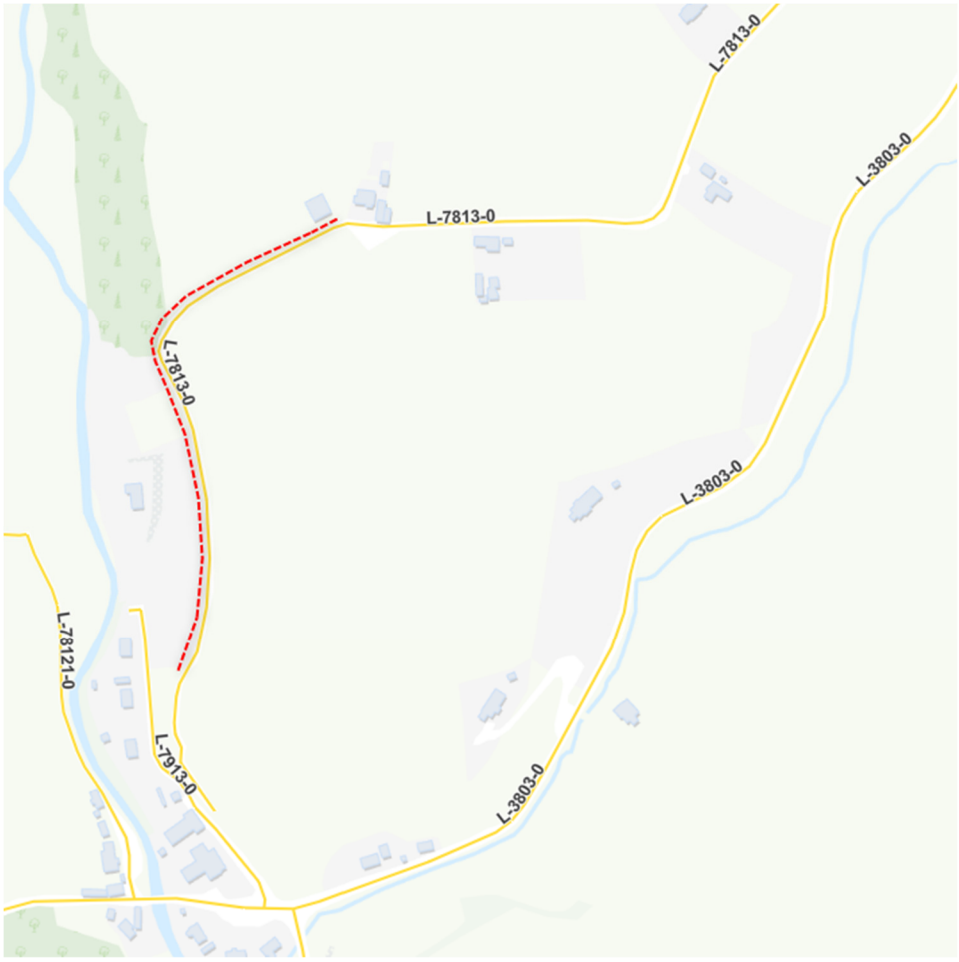

Figure 16: Extract from Cork County Council 'Road Schedule Viewer' showing L7813 connecting to Inch Village. Dashed red line added to impassable section.

There is no mention of watering down to mitigate dust on internal site access tracks or on the public road. Wheel wash facilities do not appear to be proposed.

The condition of public road surfaces is likely to see significant issues during construction. There are areas where the existing road network is damaged from intensive agricultural activities.

Within the reports provided, there is an anomaly in relation to anticipated hours of traffic in comparison to proposed work hours.

Safeguarding Existing Trees

Existing trees and vegetation contribute greatly to the character of the area. Existing trees in and around the proposed site have not been identified on the drawings. It is difficult to understand if it is proposed to remove any trees within the site, or on perimeter boundaries.

In addition, existing trees may be located within 'falling distance' of proposed solar panel arrays. This raises concerns for third parties, a liability for future damage may result in removal of trees near the proposal, further diminishing the areas landscape attributes.

5. COMMUNITY ENGAGEMENT

A 'Summary of Engagement 2025' has been provided. Section 7 of this report states that face to face consultations held in Inch Community Centre were 'very successful'.

Success can be measured in many ways.

For context, solar panel arrays are proposed 7.5meters away from our property and we share approximately 180meters of boundary with the proposal.

I outline my experience of the 'Community Engagement'

- Multiple leaflets were not delivered to our house.
- Orsted/ Perigus did not visit us.
- We had to contact Orsted initially.
- Concerns raised were not satisfactorily addressed.
- Information provided by us to Orsted was not acted upon/ incorporated into the planning documents.
- We found out that there was an opportunity to meet Orsted at Inch Community Hall from neighbours as information was not provided directly to us.
- Orsted representative did not make any notes when we met in Inch Community Hall.
- Orsted representative did not provide the information promised when we met at Inch Community Hall.
- Orsted representative tells us that, if planning is granted, farming activities would cease at the large farm neighbouring our property. The landowners later confirm via media article that this is not the case.
- No public information sessions.
- Emails unanswered.
- Information not provided to us before planning application, despite Orsted advising that it would be.

Based on my experience, the applicants account of community engagement is false.

I describe the community engagement as 'unsuccessful'.

6. PRECEDENT/ REASONS FOR REFUSAL

I have examined multiple solar farm planning applications, which have been refused. I note the following reasons for refusal, I believe each of these would also apply to this proposal:

1. Failure to demonstrate that the proposal is appropriate from a fire safety perspective, particularly relating to the battery storage and associated environmental concerns.
2. Concerns about the use of agricultural land.
3. Poor quality of information submitted, noting negative impacts to residential amenity and road safety.
4. Development being disproportionate to its surroundings and likely to diminish key features contributing to the landscape's value.
5. Unacceptable impact on residential amenity.
6. Contrary to proper planning and sustainable development.
7. Set an undesirable precedent if granted permission.
8. Insufficient Archaeological Impact Assessments.
9. Not satisfied that proposed development would not be seriously injurious with respect to Record of Monuments and Places.
10. Insufficient mitigation measures by way of natural screening and landscaping.
11. Would depreciate the value of property in the vicinity.
12. Concern proposal could contribute to flood risk.
13. Potential for impacts on the archaeological/cultural heritage of the area.
14. Obtrusive impact on the character of the rural landscape.
15. Not set back far enough from public roads.
16. Negative Biodiversity impacts.

7. QUALITY OF INFORMATION SUBMITTED

I have concerns about the quality and accuracy of information submitted with this application.

I identified issues relating to landscaping proposals and viewpoint images in section 2.

I have seen a lot of issues on the application documents.

As a representative sample, I highlight issues on *'SITE LAYOUT Sheet 4 of 14',* drawing number 7373-PL-DR-104. I use this drawing as it includes the area around my home.

General comments:

Drawing does not clearly reflect the existing buildings, septic tanks and percolation areas, bored wells or significant tree stands etc. I understand these to be validation requirements for any planning application.

The drawing is provided at a scale of 1:1000, not the standard 1:500 scale for site layout plans. This has impacted my ability to review the details of this proposal.

It is unclear if ground contour level lines on the drawing are existing or proposed.

Figure 27 indicates an extract of drawing 7373-PL-DR-104. I have added numbers, each of which relate to the following issues:

1. Drawing notes 20m Wide Drainage buffer – There does not appear to be an existing drain in this location.
2. Insufficient set back allowed from our property. Less overbearing set back marked up, indicated in yellow.
3. Existing Mature Copse, Septic Tank and Percolation area not indicated on drawing.



Figure 17: Existing Copse

Existing Copse overshadows proposed solar panels.



Figure 18: Overshadowing from existing copse.

4. Unclear if works are proposed between red line boundary and 'Retained & Enhanced Hedgerow'. Unclear if this area will be used for vehicular traffic.
5. Existing building misrepresented.
6. Existing building not shown.
7. Unclear why there is an 'Existing upgraded track' in this area. Is does not appear to serve the development. Also note that drawings have not been provided to show what 'upgrade' works are proposed.
   Dust raised from this track currently injures our residential amenity. Application documents do not include for dust mitigation measures here.



Figure 19: Dust Pollution raised from the application site, blown across our property, and other third party lands

8. Unclear how surface water runoff/ silt will be dealt with here.
9. Existing open stream in this location – 20m drainage buffer not provided.
10. CCTV pole – Proposed field of view not provided. Unclear if this will breach our property.
11. Transformer units – proposed floor levels not provided – More appropriate siting would be further away from houses, with sound reducing measure incorporated.
12. Existing surface water soakaway not shown. (Soakaway location indicated on site layout drawing 01.1, as submitted under Cork County Council planning file reference 25/69/48)

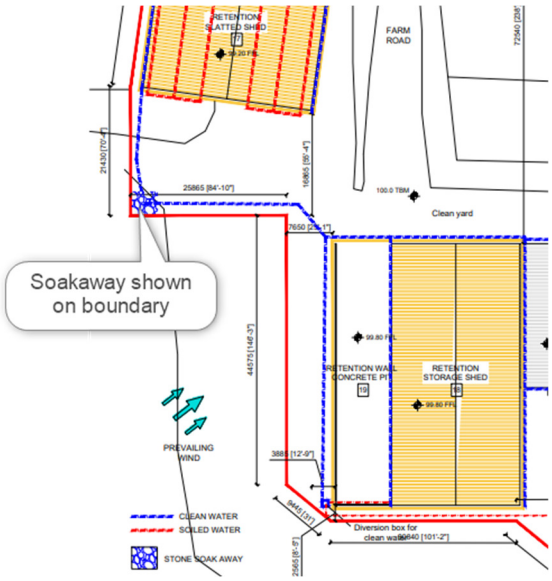

Figure 20: Extract from drawing 01.1, as submitted under CCC Planning retention file reference 25/6948

13. Unclear if ground contour level lines are existing or proposed. The contour lines shown in this area differ significantly to existing topographical conditions on the ground. It is unclear if significant excavation is proposed to lower the ground level to its natural level, or if panels will be elevated above 3-4m above the existing ground.
14. CCTV pole – Proposed field of view not provided. Unclear if this will breach our property.
15. Existing gate in this location. Drawing seems to suggest that this existing gate will be closed by fence as indicated on drawing. Confirmation of same should be provided.
16. CCTV pole – Proposed field of view not provided. Unclear if this will breach our property.
17. Existing overhead ESB cable route and associated poles. These have not been indicated on drawing. We highlighted this during the consultation stage and were advised that solar panels would not be located under this overhead cable. Submitted drawings do not reflect this.

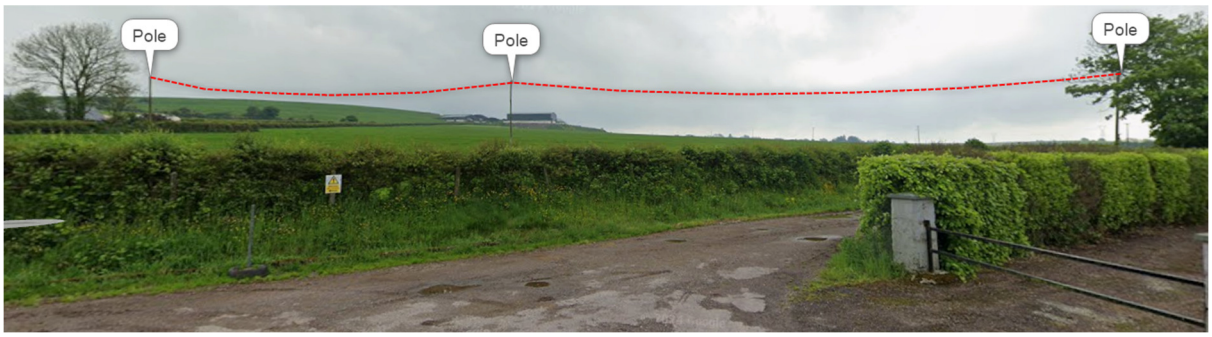

Figure 21: Existing ESB infrastructure, not indicated on drawing

18. Insufficient set back allowed from our property. Less overbearing set back marked up, indicated in yellow.
19. Existing mature trees not indicated.



Figure 22: Existing Mature Trees not indicated on drawing

20. Existing gate in this location. Drawing seems to suggest that this existing gate will be closed by fence as indicated on drawing. Confirmation of same should be provided.
21. There appears to be no access shown to this field. How will construction access be provided? How will Operational Access be provided? How would service connections be made.
22. Significant surface water run off down road from the site. This is a nuisance and needs to be resolved. Freezing conditions create a significant health and safety risk.



Figure 23: Water run off in freezing conditions



Figure 24: Frozen run off from the site

23. Significant silty water run off in this location currently – how will this be resolved?



Figure 25: Silty run off from existing track

Surface of this track is of poor quality and a significant cause of dust pollution in dry weather.

24. Existing gate in this location. Drawing seems to suggest that this existing gate will be closed by fence as indicated on drawing. Confirmation of same should be provided.
25. Insufficient sightlines in this location. Vehicles approaching from the west cannot safely see vehicles approaching from the east.
26. Existing Drain in this location – 20m wide drainage buffer not provided
27. North/ south leg of existing overhead line does not appear to exist on site. Is this a proposed element? The purpose is unclear.

28. Area prone to flooding. This was not stated in the application report.



Figure 26: Flooding visible on subject site. January 2025

29. Unclear why this existing track will be upgraded. What will it be used for?
30. Unclear why existing track is upgraded to the site boundary. What will it be used for?
31. Unclear how high solar panels will be above the ground, particularly on hilly area. Drawing PL-501 shows solar panel table array sitting idyllically on flat ground
32. Existing underground land drainage pipes not indicated anywhere on the site. How can the flood risk assessment be accurate without this information? 20m wide drainage buffer zones not provided for underground pipes.
33. Drawing Note: *'Inverter / Transformer & Installation Hardstand. Refer to Drawing 7353-PL-801,802 &803'*
    Drawing 801, 802 & 803 relate to fencing/ gate details. Misleading to the public.
34. Drawing Note: *Proposed CCTV – Pole Mounted Refer to Drawing No 7353-PL-805.*
    Drawing 805 relates to a construction compound. Misleading to the public.

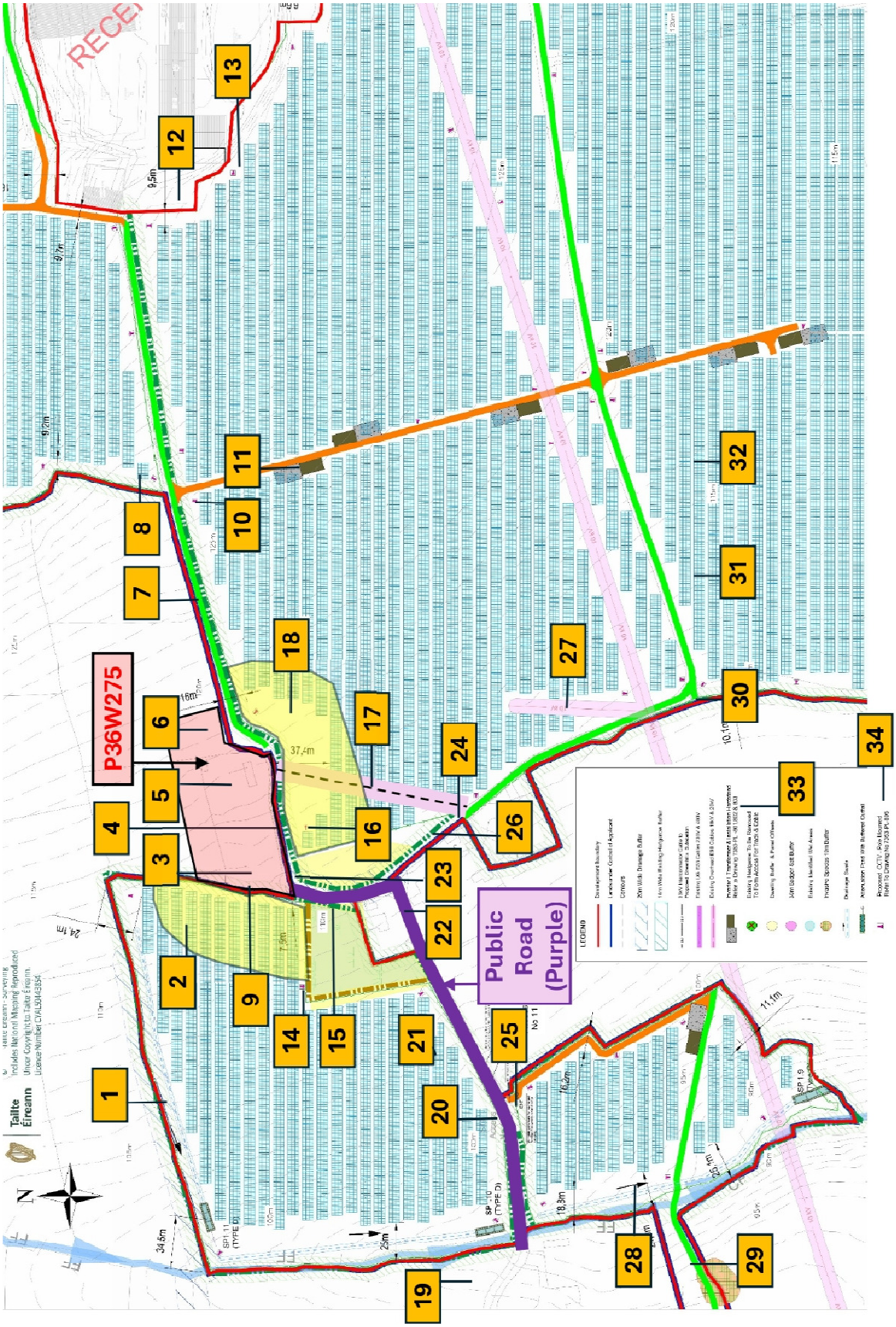

Figure 27: Issues identified on drawing 7353-PL-DR-104