To: An Coimisiún Pleanála
Re: Observation opposing proposed development of a 220kV Air Insulated Substation (AIS) and Loop-in Grid Connection at Greenhills Solar Farm
Case Reference: VA04.324632
Location: Ballyneague, Ballydaniel and Knocknagappagh, County Cork

FORMAL OBSERVATION AND OBJECTION

Dear Sir/Madam,

I wish to make a formal observation and objection to the above proposed development.

I am a nearby resident and/or landowner located approximately 3 kilometres from the proposed development, and I am involved in agriculture. My concerns relate to the cumulative impact of the wider development, the visual impact on the rural countryside, potential effects on wildlife and the environment, and the implications for agricultural land, surrounding property and the future economic prospects of farming in the area.

I respectfully request that An Coimisiún Pleanála carefully consider the following matters before making any decision on this application.

1. Cumulative impact of the wider development

I am concerned that the proposed substation and grid connection cannot be properly assessed in isolation from the wider Greenhills Solar Farm development that it is intended to serve.

The substation and associated grid infrastructure form part of a broader development with the potential to change the character and use of the surrounding countryside. The assessment should consider the combined effects of the solar farm, electrical infrastructure, grid connection, access arrangements, construction activities and any other relevant existing, permitted or proposed developments in the surrounding area.

I ask the Commission to ensure that the cumulative environmental, landscape, ecological and agricultural effects are fully assessed, rather than considering each element separately in a way that could understate the overall impact.

I am also concerned about the planning status of the associated solar farm. If a related application has been declared invalid or has not obtained the necessary permission, the Commission should establish the precise status of that application and explain how the proposed substation would serve a lawful and deliverable development.

I do not consider it appropriate to overlook uncertainty surrounding the wider project when assessing infrastructure whose purpose and justification are linked to it. I request that the Commission address this issue explicitly and provide clear reasons for its conclusions.

2. Loss of good agricultural land and the future viability of farming

As someone involved in agriculture, I am particularly concerned about the loss of productive agricultural land and the longer-term consequences for farming in this area.

Good agricultural land is a finite resource. Its loss or sterilisation for infrastructure can reduce the land available for agricultural production and place additional pressure on the remaining land available to farmers.

This concern extends beyond the physical footprint of the proposed substation. The Commission should consider the wider implications of the associated development for the agricultural landscape, the continuity of farming operations and the availability of suitable land for future agricultural use.

I am also concerned about the potential effects on agricultural land values and rental prices. If productive land becomes less available, or if the character and attractiveness of the surrounding area change, farmers who depend on renting additional land may face greater difficulty securing land on economically viable terms.

For those involved in agriculture, access to suitable land can be fundamental to maintaining or expanding a viable farming enterprise. Any additional pressure on land availability or rental costs could undermine future opportunities for existing farmers and those seeking to enter or develop an agricultural business.

I recognise that the precise effect on land values and rental prices would require evidence. Nevertheless, I ask the Commission to consider these concerns in its assessment of agricultural land use, the local rural economy and the longer-term implications of the proposed development.

The Commission should also establish whether less harmful alternatives are available and whether the proposed location and design adequately protect productive agricultural land.

3. Visual impact on the countryside

I object to the potential adverse visual impact of introducing substantial 220kV electrical infrastructure into the rural landscape.

A high-voltage air-insulated substation, with its electrical apparatus, structures, security fencing, lighting and associated infrastructure, has the potential to introduce industrial elements into an agricultural setting.

Although I live approximately 3 kilometres from the proposed development, I remain concerned about its wider effect on the rural character of the area. The actual visibility and significance of the impact should be assessed using the site's topography, existing vegetation, proposed landscaping and relevant viewpoints.

I request that the Commission examine whether the visual assessment adequately considers the development as experienced from surrounding public roads, nearby properties and the wider countryside.

The assessment should also consider the cumulative visual effect of the substation and grid connection alongside the wider solar farm development. Landscaping should not be assumed to eliminate the impact without a clear assessment of its effectiveness, establishment period and long-term maintenance.

I ask the Commission to determine whether the proposed development would materially alter the rural character of the area and whether the proposed siting, scale and mitigation measures are adequate.

4. Wildlife, biodiversity and the natural environment

I am concerned about the potential effects of the proposed development on local wildlife, habitats and the wider natural environment.

Construction and operation may involve vegetation removal, ground disturbance, changes to drainage, construction traffic, lighting and the introduction of new structures. Depending on the site's ecological conditions and the nature of the works, these activities could affect habitats, wildlife movement and species using the surrounding agricultural landscape.

I request that the Commission carefully examine the ecological assessments accompanying the application, including the adequacy of baseline surveys, the identification of relevant habitats and species, the assessment of direct and indirect effects, and the proposed mitigation and monitoring measures.

I also ask the Commission to consider the cumulative ecological effects of the substation, grid connection and wider solar farm development, including any relevant effects on protected sites or species.

Any conclusion that significant environmental effects can be avoided should be supported by adequate information and an assessment appropriate to the development. Where material information is missing or uncertainty remains about potentially significant effects, I request that this be addressed before a decision is made.

5. Impact on nearby properties and the rural community

Although I am located approximately 3 kilometres from the proposed development, I am concerned about its broader implications for the surrounding rural community and nearby property.

The construction and operation of a large electrical installation may give rise to concerns regarding visual amenity, noise, lighting, traffic and the general character of the area. The significance of these effects will depend on the final design, the equipment proposed, the construction arrangements and the relationship between the site and surrounding properties.

I request that the Commission examine the relevant noise assessments, construction traffic arrangements, proposed lighting, drainage measures and operational controls to establish whether the development would adequately protect residential amenity and the rural environment.

I am also concerned about the potential implications for the attractiveness and future economic prospects of properties and agricultural holdings in the surrounding area. I acknowledge that any effect on property values would need to be demonstrated rather than assumed, but I ask that the Commission consider the evidence available on the wider effects of the development on the local area.

6. Status of the Associated Solar Farm Application and Justification for the Infrastructure

I wish to draw the Commission's attention specifically to Cork County Council planning application 26/2133, relating to the proposed Knocknagappagh Solar Farm and Battery Energy Storage development.

The available planning record identifies this application as covering approximately 323.28 hectares and including approximately 210 hectares of solar panels, battery storage and associated infrastructure. The record currently lists its status as “Invalid or incomplete”. The official Cork County Council planning file should be consulted to confirm the precise decision and its reasons.

The proposed 220kV Air Insulated Substation and loop-in grid connection, which is the subject of An Coimisiún Pleanála case VA04.324632, is directly relevant to the wider solar farm project. The relationship between these applications raises important questions about the justification, timing and planning context of the proposed infrastructure.

I ask the Commission to establish and expressly address the current planning status of application 26/2133, the reasons for its invalidity or incompleteness, and the implications of that status for the wider project.

In particular, I request that the Commission examine whether the need for the proposed substation and grid connection has been adequately justified independently of the outcome of the associated solar farm application, while also taking full account of the cumulative impacts of the wider project.

I am concerned that significant electrical infrastructure could be approved in circumstances where the planning status of the development it is intended to serve remains unresolved. This concern is especially relevant given the potential loss of productive agricultural land, the implications for future access to rented farmland, and the cumulative effects on the rural landscape and environment.

I respectfully request that the Commission not treat the substation and grid connection as an isolated development without properly addressing their relationship with the wider solar farm. If the necessary planning, environmental or project information is absent or inadequate, I ask that this be resolved before permission is granted.

I further request that the Commission consider whether the proposed development should be refused if its justification, environmental acceptability or relationship with the wider project cannot be satisfactorily established.

7. Request to An Coimisiún Pleanála

For the reasons set out above, I respectfully request that An Coimisiún Pleanála:

1. Undertake a thorough assessment of the cumulative effects of the substation, grid connection and wider Greenhills Solar Farm development.
2. Give proper consideration to the loss and potential sterilisation of productive agricultural land and the implications for the future viability of farming and access to rented land.
3. Fully assess the visual impact of the proposed infrastructure on the rural landscape.
4. Ensure that potential effects on wildlife, habitats, biodiversity and the natural environment have been adequately assessed and that appropriate mitigation is secured.
5. Examine potential effects on nearby properties, residential amenity and the wider rural community.
6. Establish the precise planning status of the associated solar farm and consider the implications for the justification and deliverability of the proposed infrastructure.
7. Require adequate further information where necessary to resolve material uncertainties before making a decision.

In light of these concerns, I request that permission be refused if the Commission concludes that the proposed development would result in unacceptable environmental, landscape or agricultural impacts, or that the relevant planning requirements have not been satisfactorily addressed.

I ask that this observation be given full consideration as part of the assessment of case VA04.324632.

Yours faithfully,

Eoin Treacy

Mount Uniacke,

Killeagh,

Cork

0860804272