Submission and Objection to Greenhills 220 kV Substation and Grid Connection

An Coimisiún Pleanála case VA04.324632

To: An Coimisiún Pleanála, 64 Marlborough Street, Dublin 1, D01 V902

Submitted by: Fergal Walsh

Address for correspondence: Barnaviddane, Inch, Killeagh, Co. Cork P36W560

Date: 02 November 2026

Subject matter: Objection to the proposed 220 kV Air Insulated Substation, loop-in grid connection and associated works at Ballyneague, Ballydaniel and Knocknagappagh, County Cork.

Request

I respectfully request that An Coimisiún Pleanála refuse permission for case VA04.324632. In the alternative, the application should not be determined until the applicant has supplied sufficiently detailed and internally consistent information resolving the matters identified below and the public has been given a fair opportunity to consider any material new information.

I make this submission as a nearby resident (1km) raising a young family in the locality. I support renewable energy in principle. My objection concerns whether this particular permanent transmission development is appropriately located, sufficiently assessed and capable of being constructed and operated without unacceptable effects on public safety, water, roads, residential amenity, landscape and the wider environment.

Basis and limits of this submission

My objection is directed to the substation and its proposed entrance and access arrangements. I am not asking the Coimisiún to determine the separate solar or BESS application. References to those developments are limited to relevant shared works, dependencies and cumulative effects on the substation, entrance and receiving environment.

This is my own submission. My grounds are set out in full below and refer directly to the applicant's documents on the public file for VA04.324632, including the Planning and Environmental Report (PER), its appendices and the SID planning drawings. The document titles and identifiable dates or revisions are listed at the end. I ask that these grounds be considered on their merits in relation to this application.

1 Scope of this application and relationship with the solar farm and BESS

I recognise that this application is not the application for the Greenhills solar farm or its 56-container Battery Energy Storage System. This Strategic Infrastructure Development (SID) application, case VA04.324632, seeks permission under section 182A for a 2.2-hectare 220 kV Air Insulated Substation, loop-in connection to the Knockraha-Cullenagh 220 kV overhead line and associated works. The separate solar and BESS proposal is before Cork County Council under application 26/2133.

This distinction is important. Concerns about BESS fire safety are not presented as though the BESS itself is being consented under this SID application. They remain relevant where the applicant relies upon combined-project assessments, where the substation and BESS share access, drainage, construction programming or environmental pathways, and where the operational consequences of the connected energy park must be assessed cumulatively.

The application notice confirms that the substation and loop-in connection are intended to remain permanently after decommissioning of the solar farm and that the substation would become part of the national grid under EirGrid management. The impacts cannot therefore be treated merely as short-term or ancillary effects of a temporary solar development.

2 Development description and permanent change

The notified development includes an EirGrid compound and control building; an Independent Power Producer compound with control, switchgear, battery and battery-control rooms; two oil-filled step-down transformers in bunded enclosures; two 220 kV transformers as separately described in the notice; these descriptions require reconciliation and are not assumed to identify four separate transformers; replacement of an existing lattice tower by two single-circuit lattice strain towers and additional overhead lines; gantries; a 37.5 m communications support structure; 18 m lightning-protection monopoles; security fencing, CCTV and lighting; a diesel generator and fuel tank; four storage containers; drainage; cut-and-fill works; and a new internal access road and entrance from the R634.

These are substantial, permanent industrial and transmission elements in an established rural agricultural and residential landscape. The assessment should address the development actually sought, including its full height, lighting, security, noise, drainage, maintenance and emergency implications over its permanent operational life.

Entrance boundary and permission for the access route

I am concerned that the scope of the access works is not consistently described. The site notice includes the internal access road and R634 entrance, whereas the notes on drawing 300101185-DR-213-P2 describe the access track as part of a separate application and still refer to 25/6876. The Coimisiún should establish precisely which sections, crossings, widening, overrun areas and drainage works are being authorised here. Essential access mitigation must have a clear and deliverable consent basis. [References 1, 4 and 10]

The drawings and landowner authorisations should demonstrate a continuous, deliverable route from Site Access No. 1 on the R634 to the compound, including the crossing of the L7829 at Entrances 8 and 9 identified in Appendix M, section 1.3.3 and Figure 1.14. References to eleven entrances across the solar farm do not demonstrate adequate access for this station. Any essential works outside the SID red line must be identified and their consent and delivery position resolved. [References 4, 7 and 10]

3 EIA screening and assessment of the whole project

The submitted EIA Screening Report is framed as an assessment of the wider approximately 323-hectare Greenhills Renewable Energy Park. Its introduction states that it was prepared to assist Cork County Council in determining whether the proposed solar farm should be subject to EIA. That purpose does not align cleanly with the present section 182A application now before the Coimisiún.

The same report combines the solar farm, BESS and substation when describing land restructuring and states that 4.7 hectares would be re-contoured, just below the five-hectare threshold cited in the report. Being below a threshold does not end the screening exercise. The nature, scale, location, cumulative effects, accident risk, pollution, nuisance and risks to human health still require assessment.

There is a material tension between separating the projects for consent purposes and combining them when convenient for environmental assessment. The Coimisiún should identify the project being screened, the direct and indirect works necessary for it to function and the relevant cumulative effects with the solar farm, BESS and related cabling. The assessment should not omit an effect because it falls within the other application, or dilute an effect by treating the substation as one small component of the larger site.

The screening report identifies construction pollution and nuisance as a medium potential impact during the stated 21-month whole-project construction period, but concludes that cumulative impact is low and that effects can be reduced. Those conclusions depend heavily on mitigation plans, later contractor detail and successful implementation. Essential mitigation must be sufficiently defined and assessable before consent.

I ask the Coimisiún to undertake and record its own reasoned screening determination for the SID development, considering the whole project where required by law. The Commission should determine the applicable project classes and screening obligations and require an EIAR where the statutory test is met; unresolved environmental matters also require assessment as substantive planning grounds.

Earthworks and screening quantities

I am concerned about the inconsistent earthworks quantities. PER section 5.5.6.1 gives an estimated cut-and-fill volume of 25,013 m^3 and approximately 9,320 m^3 of imported capping stone. Drawing 300101185-DR-213-P2 gives a cut volume of approximately 17,304 m^3, but its cut/fill summary table gives approximately 34,649 m^3 of fill while its notes state 36,649 m^3. The drawing also gives approximately 9,490 m^3 of capping stone. These figures require reconciliation in a single material balance covering excavation, reuse, imported fill and capping, unsuitable material and any export. I do not add the figures together because their scope and overlap are unclear. [References 2 and 10]

That reconciliation affects haulage, stockpiling, compaction, drainage and the land-recontouring assessment. The EIA Screening Report's figure of 4.7 hectares should be supported by a mapped calculation covering all relevant works and checked against the platform and access design. Drawing 300101185-DR-213-P2 describes its quantities as preliminary; the Coimisiún should establish whether the environmental and traffic assessments use the same design and quantities. [References 3 and 10]

4 Noise and vibration assessment

Appendix S is a whole-energy-park Noise and Vibration Impact Assessment. It assesses solar arrays, BESS, cabling and the substation together. That may assist cumulative assessment, but it does not transparently identify the standalone contribution of the SID development at each affected dwelling.

I examined Figure 1.7 and the operational contour maps against drawing 300101185-DR-100A-P4. The maps place the substation east of the BESS, consistent with the overall layout. I therefore do not allege that those two labels are reversed. The problem is the lack of transparent model inputs and source-specific results capable of verifying that the mapped contours accurately represent the substation configuration now proposed.

Table 1.31 applies a sound-power level of 93 dB LWA to the substation, solar-farm transformers and BESS. The report describes this as manufacturer data or a typical source. It also states that octave-band data are unavailable, so an objective assessment of tonality cannot be undertaken before planning. It proposes investigation of special sound characteristics, typically after a complaint post-construction.

This is not an adequate basis for authorising permanent electrical infrastructure near rural homes. Transformer noise can contain tonal and low-frequency characteristics that are more noticeable in a quiet environment. The absence of final equipment data should be addressed by conservative model assumptions, enforceable sound-power and tonal limits, and pre-commissioning and post-commissioning verification, not primarily by waiting for residents to complain.

The applicant should provide or be required to comply with:

- A source schedule identifying each transformer, cooling unit, generator, switchgear or other material source, its location, operating period and simultaneous operating scenario.
- Octave- or one-third-octave-band sound data and appropriate corrections for tonality, impulsivity or other special characteristics.

- Separate predicted contributions from the SID substation and from the BESS/solar development at each representative receptor.
- A justified night-time assessment reflecting the permanent 24-hour operation of the substation.
- Pre-commissioning review of final equipment and commissioning measurements at representative homes, with defined investigation and corrective-action timescales.
- An enforceable requirement that replacement or uprated equipment remain within the assessed noise envelope.

The report also predicts construction vibration above its stated 1.0 mm/s significance threshold at several representative receptors. The assessment should identify which SID activities contribute, their duration and location, and the monitoring and stop-work criteria that would protect residents from disturbance as well as buildings from damage.

Quiet night conditions and representative homes

Appendix S, Table 1.21 records a night-time background reading as low as 19 dB LA90 at BN7. Table 1.31 assigns 93 dB LWA to the substation. I am concerned that it is not sufficiently clear whether this represents one transformer, both transformers or the complete station. Sound power at equipment and sound pressure at a dwelling are different quantities and should not be compared directly. The required evidence is the predicted station sound pressure and rating level at each relevant dwelling, with the source count, operating state, propagation and tonal corrections explained. [Reference 8]

Appendix S, Table 1.32 reports operational predictions for 13 representative receptors. The applicant should demonstrate that these represent the nearest and potentially most affected homes around the station and access route, rather than assume that proximity to the wider energy-park boundary identifies the critical receptor. [Reference 8, Table 1.32 and Figure 1.7]

5 Transformer oil, drainage and water protection

The proposal includes oil-filled transformers, a diesel generator and fuel tank, extensive electrical equipment, drainage and a soakaway. These introduce credible pollution sources. The submitted CEMP refers to bunding, monitoring, spill kits and general pollution-prevention measures, while its Surface Water Management Plan states that a 5 m by 5 m by 1.8 m soakaway is proposed at the substation.

The documents should demonstrate the capacity, isolation philosophy and discharge route of the operational drainage system, rather than rely on general construction controls. Bunding addresses primary containment but does not remove the need to examine overfilling, bund drainage, fire or equipment failure, simultaneous rainfall and contaminated runoff.

The drainage drawings and written assessment should establish:

- The oil inventory and containment capacity for each transformer and fuel installation, including freeboard and rainfall assumptions.
- How clean and potentially contaminated drainage are separated, monitored and isolated.
- Whether oil detection, interceptors or automatic shut-off are provided and the basis for their selection.
- The fate of water accumulating in bunds and the controls before release.
- How a release would be retained before reaching soil, groundwater, field drains or surface waters.
- Inspection, maintenance and testing requirements throughout permanent operation.
- Baseline and incident arrangements for potentially affected private wells.

My household relies on a private well. Monitoring after migration has occurred would not prevent exposure before results are available. Protection must prioritise prevention, immediate isolation, timely warning and alternative water provision where a credible pathway exists. This is critical to my families safety and wellbeing.

Ground investigation and infiltration design

Appendix C, section 2.1 records six trial pits approximately 2.0–2.3 m deep. Section 3.1 states that borehole investigation is required to confirm conditions at greater depths. Appendix N describes substation excavation to approximately 3.6 m. I am concerned that the implications of deeper excavation for rock, groundwater, dewatering and platform construction have not been sufficiently established. A preliminary ground investigation should not be treated as proof that these matters are resolved. [References 6 and 9]

Drawing 300101185-DR-200-P2 marks soakaway details for confirmation at detailed design and includes a 5 m × 5 m × 1.3 m soakaway, whereas the CEMP Surface Water Management Plan describes a 5 m × 5 m × 1.8 m substation soakaway. I ask the Coimisiún to establish whether these refer to the same installation, reconcile their design basis and require the supporting infiltration tests, treatment and isolation arrangements and overflow destination. Soakage of clean runoff must be distinguished from accidental discharge of oil, diesel or contaminated firewater. [References 5, 6 and 11]

6 Flood risk and drainage resilience

The Inch area has experienced serious flooding, road damage and prolonged access disruption, including during Storm Babet in October 2023. These local conditions are relevant to the capacity and resilience of the receiving drainage network and to emergency access.

The proposed compound involves cut and fill, buildings, hardstanding, roads, drainage and permanent equipment. The assessment should demonstrate performance during intense rainfall, prolonged saturated conditions, blockage, maintenance failure and exceedance—not only under ideal design conditions. Climate allowances should be clearly connected to the final drainage calculations and outfall or infiltration assumptions.

The cumulative drainage implications of the substation, adjacent BESS, access works, solar development and cable works should be assessed wherever they share catchments or receiving drains. Separate applications do not create separate hydrology.

Any permission would require clear conditions preventing an increase in downstream flood risk, requiring maintenance and inspection records, and retaining safe access during flood conditions. In my view, those matters should be demonstrated before permission rather than left to final contractor design.

7 Construction traffic, the R634 and vulnerable road users

The SID development would use a new entrance and access from the R634 and would require abnormal loads, transformer deliveries, stone, concrete, plant, staff movements and removal or replacement of transmission structures. Junction capacity alone is not a sufficient measure of safety on this rural road network.

The assessment must address actual vehicle size, swept paths, gradients, stopping and waiting locations, visibility, temporary traffic management and interaction with residents, school traffic, agricultural vehicles, cyclists, walkers and horse riders. My daughter attends Inch National School, and these roads form part of our family's regular travel and community life.

Wheel washing is not the same as a defined road-inspection and sweeping regime. Mud, stone or sediment already deposited on the road can affect grip and drainage. The CEMP should establish inspection frequencies, cleaning triggers, available equipment, response times, responsibility and escalation, including suspension of relevant movements where roads cannot be maintained safely.

The programme must also address cumulative or overlapping construction for the substation, solar farm, BESS and cabling. Limits should be based on combined traffic actually using each road, not separate theoretical maxima for individual consent processes.

Abnormal loads and realistic haulage

Appendix M, section 1.3.3 identifies two transformer loads of approximately 150 tonnes each, delivered from either Cork or Waterford port via the N25 and R634, then across the L7829 at Entrances 8 and 9. Section 1.5.11 defers watercourse-crossing condition surveys and the identification of any bridge or culvert strengthening until after permission. Entrance swept paths do not establish the capacity of the complete route. I ask that the selected route and any essential strengthening or temporary works be assessed before those movements are relied upon. [Reference 7, sections 1.3.3 and 1.5.11 and Figure 1.14]

A station-specific traffic schedule must reconcile imported stone and earthworks with payload assumptions and delivery sequencing. Appendix M's whole-project peak of 25 HGV arrivals daily should not simply be adopted without showing how station stone, concrete, equipment and abnormal-load deliveries fit within it. PER sections 5.4 and 5.5.6 should be reconciled with the traffic assessment in one coordinated programme showing the relevant activities, durations, working hours and road restrictions. Different phase durations are not necessarily contradictory, but the combined implications for residents must be clear. [References 2 and 7]

The three-arch bridge beside Inch Church and local flood-damaged roads should not be assumed suitable as diversion routes. The assessment must also address access to adjoining fields, vulnerable road users, roadside drainage and any underpass actually relied upon. I do not assume every road or underpass described in the solar application is part of this SID route.

8 Construction environmental management

The submitted CEMP describes itself as a live document to be expanded by contractors after appointment. Updating implementation detail is normal, but matters essential to environmental acceptability should not be deferred. The final location, capacity and performance of temporary drainage, spoil storage, concrete washout, pollution response, road cleaning, monitoring and stop-work arrangements should be sufficiently established now.

The indicative wider-project programme includes autumn and winter activity. Wet ground and repeated rainfall can affect erosion, spoil handling, construction access, drainage performance and road cleanliness even below formal weather-warning thresholds. Site-specific rainfall and ground-condition triggers, storm preparation and restart checks are needed.

The CEMP includes a construction emergency response plan. It should not be treated as an operational emergency plan for the permanent substation or the separate BESS. Operational ownership, out-of-hours contacts, electrical isolation, fire and transformer-oil incidents, environmental containment and coordination with Cork County Fire Service require separate, completed arrangements before energisation.

9 Operational safety and cumulative emergency response

The SID site itself includes high-voltage infrastructure, oil-filled transformers, a battery room, diesel generator and fuel tank. Its operational hazards require a site-specific emergency framework proportionate to the final equipment and EirGrid/IPP responsibilities.

The adjacent BESS is outside this consent, but cumulative emergency planning remains relevant because the developments are functionally connected and located beside one another. A BESS incident, transformer fire, flooding or access obstruction could affect the safe operation, isolation or emergency access of the other installation. Conversely, substation equipment, oil inventory and drainage could add to the consequences of an incident affecting the shared area.

The applicant should demonstrate clear separation of responsibilities between Perigus, EirGrid, the IPP operator and emergency services; safe access and staging; reliable water or appropriate response resources; drainage isolation; retention of contaminated water; public warning; and contingency where

the normal approach is unavailable. This is not an assertion that an incident is inevitable. It is a request that credible low-probability, high-consequence scenarios be assessed before permanent infrastructure is authorised.

Battery room and operational interfaces

The notified IPP building includes a battery room and battery-control room. These must not be confused with the separate 56-container BESS. Their function, technology, capacity, ventilation, detection, isolation and relevant emergency provisions should be explained for the installation actually proposed. PER section 5.5.6.1 also refers to delivery of containers with battery units and a temporary compound serving related works. I ask that the scope and responsibilities be clarified; I do not assume that the separate BESS is being authorised here. [References 1 and 2]

10 Landscape, lighting and rural character

The development would introduce lattice towers, gantries, an extensive AIS compound, buildings, fencing, CCTV, security lighting, 18 m lightning monopoles and a 37.5 m communications structure. These are permanent vertical and industrial features, not merely elements screened by solar-farm hedgerows.

The LVIA and mitigation plans should demonstrate visibility from nearby homes, local roads and community routes during winter as well as summer. Existing hedgerows are managed agricultural features and cannot automatically be assumed to retain a fixed height or density. Proposed planting takes time to establish and may fail or require replacement.

Lighting should be limited to what is operationally and legally necessary, designed to avoid unnecessary spill towards homes, roads and ecological receptors, and controlled by defined hours, sensors or emergency-use requirements where practicable.

Permanent vertical structures and entrance visibility

The site notice describes a 37.5 m communications structure, while drawing 300101185-DR-203-P2 shows a 36.60 m dimension for the telecom tower. I ask that the dimensions, datum and any additional antenna height be reconciled so that the visual assessment reflects the complete structure sought. The assessment must represent the station, transmission structures, lighting and R634 entrance; panel-height screening assumptions alone cannot establish the visibility of these taller permanent structures. [References 1 and 12]

The relevant views should include occupied homes and sequential journeys along the R634 and the local road corridor I use between Barnaviddane and Inch. Planting effective for panels cannot automatically screen lattice structures and lightning masts. The early years, winter screening and permanent residual effects require explicit treatment against the submitted station elevations and landscaping proposals. [References 2 and 12]

11 Ecology, NIS and cumulative effects

The application is accompanied by a Natura Impact Statement. The Coimisiún must carry out its own Appropriate Assessment and may grant permission only where the applicable legal test is met. Mitigation relied upon must be specific, certain and enforceable.

Construction pollution, sediment, drainage, invasive-species spread, lighting, vegetation removal and disturbance should be assessed for the SID works themselves and in combination with the solar farm, BESS, cables, permitted projects and any overlapping programme. General reliance on each project being subject to a separate statutory process is not a substitute for assessing actual shared pathways and effects.

Ecological supervision requires defined responsibilities, suitable coverage and authority to stop or change work. Monitoring should include response thresholds and corrective action, rather than merely record conditions after an adverse change.

Specific ecological pathways and assessment stages

The submitted AA Screening and NIS Report identifies hydrological connections to the Blackwater River (Cork/Waterford) SAC and Blackwater Estuary SPA through the receiving river network, including the Tourig. I am concerned that the assessment must clearly address the station earthworks, entrance drainage and operational pollution sources, with site-specific conservation objectives and a traceable mitigation schedule. The Coimisiún should establish that the report, dated December 2025, remains applicable to the layout and works in this SID application. The date alone does not establish inadequacy, but any relevant design changes must be accounted for. [Reference 13, sections 4.1.3, 4.2 and 5.5]

My concern is whether the Appropriate Assessment provides sufficient certainty that the proposed development will not adversely affect the integrity of the relevant European sites, including in combination with other plans or projects. I recognise that mitigation can be examined at Stage 2. The submitted EIA Screening Report and NIS exist; my objection concerns their adequacy for the particular development being determined, not their absence. [References 3 and 13]

12 Archaeology and ground disturbance

The substation requires cut and fill, foundations, drainage, roads, towers, gantries and underground services. The archaeological assessment should demonstrate that the entire footprint and associated works have been adequately investigated and that any exclusion areas are compatible with the final design.

Further investigation after consent can implement a defined protection strategy, but it should not be used to discover whether the consented layout is feasible. Procedures for unexpected remains must include immediate suspension, protection, competent assessment and redesign where necessary.

Investigation before the station layout is fixed

Appendix R reproduces County Development Plan objectives HE 16-9 and HE 16-13 concerning archaeological assessment of infrastructure and protection of previously unrecorded sites. I ask that investigation adequately informs the station design and protection strategy. Deep platform excavation is materially different from shallow solar supports or no-dig foundations: protection proposed for panel areas does not establish that station excavation is acceptable. The station, entrance and associated ground disturbance need their own mapped investigation and protection strategy. [Reference 14, Appendix F, Development Plan policy extracts]

13 Decommissioning and permanent infrastructure

The application seeks permanent permission for the substation and loop-in connection, which would remain after the solar farm is decommissioned. The environmental and landscape assessment should therefore avoid implying that the entire energy development will be removed after 40 years.

The documents should distinguish clearly between infrastructure to be removed, infrastructure to be transferred to EirGrid and infrastructure that will remain indefinitely. Responsibility for maintenance, drainage, noise, lighting, landscaping and emergency arrangements must remain clear through changes in ownership or operator.

For temporary compounds and works, restoration standards and verification should be defined. For permanent works, the residual land-use and landscape effects must be assessed as permanent rather than deferred to a future decommissioning plan.

Existing land use and alternatives

The permanent occupation of agricultural land by a transmission compound differs from potentially reversible panel installation. PER section 7.7 discusses Development Plan policy, including GI 14-9 on landscape. I ask the Coimisiún to assess compatibility with the applicable land-use, landscape, hedgerow and transmission policies and the justification for this particular location and entrance. [Reference 2, section 7.7]

I do not suggest that unzoned agricultural land automatically prohibits transmission development. My objection is that general support for electricity infrastructure does not establish the suitability of this particular site, platform, entrance and permanent landscape change. The assessment should explain whether feasible alternative locations or access configurations would reduce the identified effects.

14 Community engagement and residential amenity

This is a separate strategic-infrastructure application with its own legal process. Residents should not be expected to infer the SID implications from engagement mainly directed toward the solar project. Clear information should distinguish what is being decided here, what remains in the Council application, which entity will own and operate each component and who is accountable during construction and operation.

We chose our home for its rural setting, distance from major infrastructure and connection to Inch school, friends and community amenities. Our garden, local walks, visits to friends and nearby horses, and safe use of local roads are ordinary parts of family life. Construction noise, dust, vibration, traffic and the permanent visual and operational change should be considered cumulatively rather than as isolated technical topics.

A low population density does not make individual homes less sensitive. The proposal should be assessed according to actual proximity, exposure and vulnerability, including families with young children and households dependent on private wells.

Existing environmental baseline

I ask that the environmental baseline establish whether historic quarrying, made ground, deposited waste or any relevant waste-management investigation affects the station footprint, access route or connected drainage. Where such a connection exists, it should inform ground investigation, material testing, excavation controls and water protection. I do not assert that contamination has been established within the station footprint; my concern is that relevant historic land use and existing conditions are properly checked before ground disturbance. [Reference 9, baseline land, soils, geology and water assessment]

15 Conditions cannot replace missing assessment

Conditions may appropriately control detailed implementation, but they should not supply the first assessment of essential matters. If the Coimisiún considers permission notwithstanding these objections, conditions should at minimum secure final equipment noise limits and verification; transformer and fuel containment; drainage isolation and maintenance; construction traffic and road-cleaning controls; private-well protection; ecological and archaeological supervision; landscape establishment and replacement; operational emergency coordination; and cumulative construction management with the related energy park.

Any materially revised noise model, drainage design, emergency strategy or project description should be subject to appropriate public scrutiny before determination.

Conclusion

The proposed SID development is a substantial permanent 220 kV transmission installation in a rural residential and agricultural area. The application relies heavily on whole-project documents prepared for the wider solar and BESS proposal, while the consent now sought is legally and physically distinct. This creates unresolved questions about the project actually screened, the standalone and cumulative effects of the substation, and the enforceability of mitigation across separate consents and future operators.

Particular concerns remain regarding the EIA screening basis, source-specific operational noise and tonality, construction vibration, transformer-oil containment, drainage and private-well protection, flood resilience, R634 traffic and vulnerable users, permanent landscape effects, ecological pathways, operational emergency responsibilities and the cumulative interaction with the adjacent BESS and solar development.

The noise maps appear to place the substation and BESS consistently with the overall site layout; my objection does not depend on alleging that those labels are reversed. It depends on the more fundamental absence of sufficiently transparent, equipment-specific and consent-specific information demonstrating that the permanent SID development can operate within acceptable limits at nearby homes and within this receiving environment.

For the reasons set out above, I respectfully ask An Coimisiún Pleanála to refuse permission for VA04.324632. If permission is not refused on the information currently available, the Coimisiún should require the identified matters to be resolved through further information and provide an appropriate opportunity for public participation on any material new documentation.

Yours faithfully,

Fergal Walsh

Application documents referenced

References below identify the applicant's documents available on the public file for VA04.324632, checked on 2 November 2026. Dates and revision codes identify those documents; an older internal

date does not itself mean that a document is superseded or invalid. Where a report covers the wider energy park, my grounds concern its relevance to this substation and access application. References to report sections and tables use the document's own numbering.

1. Site Notice and SID Application Cover Letter, 8 September 2026. Formal scope, access, permanent operation and submission arrangements. Open application document

2. Planning and Environmental Report, August 2026, RSK project 605444. Sections 4.3, 4.4, 5.4, 5.5.6.1, 5.5.6.2 and 7.7. Open application document

3. EIA Screening Report, August 2026, RSK project 605444. Project description, land restructuring and screening conclusions. Open application document

4. Site Layout Plan, drawing 300101185-DR-101-P6, revision P6 dated 2 September 2026, issued for SID planning. Open application document

5. Appendix F, Construction Environmental Management Plan, August 2026; author dates 6 August 2026. Includes the Surface Water Management Plan and construction emergency arrangements. Open application document

6. Appendix C, Site Investigation Report, August 2025. Sections 2.1, 2.2 and 3.1 and trial-pit records. Open application document

7. Appendix M, Traffic and Transport Impact Assessment, in the August 2026 submission. Sections 1.3.3, 1.5.10, 1.5.11, Figure 1.14 and construction-traffic conclusions. Open application document

8. Appendix S, Noise and Vibration Impact Assessment, July 2026 cover date; submitted filename ends Final 050826. Tables 1.21, 1.29, 1.31 and 1.32, Figure 1.7 and section 1.4.3. Open application document

9. Appendix N, Land, Soils, Geology, Hydrology and Hydrogeology Assessment, August 2026, dated 12 August 2026, submitted Final Combined file. Ground conditions, excavation depths, drainage, groundwater and private-well assessment. Open application document

10. Cut and Fill Details Substation Compound, drawing 300101185-DR-213-P2. The revision box prints 6 February 2025. Summary table, notes and material quantities require reconciliation. Open application document

11. Substation Layout Plan and Drainage, drawing 300101185-DR-200-P2, revision dated 6 February 2026. Bunding, drainage, soakaways and detailed-design notes. Open application document

12. Substation Elevations Sheet 1 of 2, drawing 300101185-DR-203-P2, revision dated 6 February 2026. Telecom tower and permanent structures. Open application document

13. Screening for Appropriate Assessment and Natura Impact Statement, December 2025, submitted as AA Screening and NIS Report.pdf. Sections 4.1.3, 4.2 and 5.5. Open application document

14. Appendix R, Archaeological Architectural and Cultural Heritage Baseline Impact Assessment, August 2026. Assessment, mitigation and Appendix F policy extracts. Open application document

Appendix 2 – Local Pictures of flooding in Inch.



