OBSERVATION TO AN COIMISIÚN PLEANÁLA

Case Reference: 324632

Proposed 220 kV Air Insulated Substation and Loop-in Grid Connection at Greenhills Solar Farm, Co. Cork

Date: 30 October 2026

Dear Sir/Madam,

I wish to make an observation regarding the above application.

I am a resident of Youghal, Co. Cork, and my children attend school at Inch National School. I am deeply concerned about the potential long-term effects of the proposed development, and its relationship with the wider Greenhills Renewable Energy Development, on local residents, school communities, road users and the surrounding environment.

I support Ireland's transition to renewable energy and recognise the need for appropriate electricity-grid infrastructure. My concern is whether this particular development, at this location and over its proposed lifetime, has been demonstrated to be appropriately located, environmentally acceptable, safely operable and capable of responsible long-term management.

1. Connected Development and Cumulative Effects

The proposed substation and grid connection are functionally related to the wider Greenhills Renewable Energy Development. I request that the Commission satisfy itself that the direct, indirect and cumulative effects of all relevant connected infrastructure have been adequately assessed, including the interaction between the grid infrastructure, solar development, proposed Battery Energy Storage System (BESS), underground cabling, access arrangements and associated works.

Where components are considered through separate planning processes, this should not result in any relevant cumulative environmental or community effect being overlooked or underestimated. The Commission should clearly establish which elements fall within case 324632, which are subject to separate planning processes, whether their construction periods may overlap, and whether the mitigation proposed across the connected development is consistent and enforceable.

2. Long-Term Community Effects

The Commission should consider the long-term combined effects of substantial electricity-generation, storage and high-voltage infrastructure on residential amenity, landscape and visual character, noise, lighting, local roads, biodiversity, watercourses, emergency-service access and the future development of the locality.

The assessment should reflect the combined experience of communities living alongside the overall development rather than considering each infrastructure component entirely in isolation.

3. Construction Traffic and School Travel

As a parent of children attending school in Inch, I am particularly concerned about construction traffic on roads used by families and school traffic.

Where proposed construction or delivery routes coincide with roads materially used for school access, the Commission should specifically consider interactions between HGV and abnormal-load movements, school traffic, pedestrians, cyclists, buses and other vulnerable road users. If permission is granted, appropriate controls should apply to routes and delivery times, including restrictions during relevant school arrival and collection periods where necessary.

4. Water Environment, Biodiversity and European sites

I am concerned about potential effects on local watercourses and downstream receiving environments during excavation, drainage works, cable installation and other ground disturbance. The assessment should address sediment and silt mobilisation, construction runoff, dewatering, accidental releases, concrete-related runoff and extreme rainfall events.

Where mitigation is relied upon to protect water quality or ecological receptors, it should be specific, enforceable and capable of independent monitoring. The Commission should also independently examine the applicant's Appropriate Assessment information and apply the applicable legal test when determining whether adverse effects on the integrity of any relevant European site can be excluded.

5. BESS Safety and Emergency Response

I have particular concerns regarding the proposed BESS forming part of the wider Greenhills Renewable Energy Development and its cumulative relationship with the infrastructure currently before the Commission.

My concern is whether the installation proposed through the relevant planning process has been supported by a sufficiently robust, site-specific assessment of credible fire, thermal and other emergency scenarios.

The relevant assessment should clearly address the battery technology and chemistry assessed, fire detection and propagation controls, emergency isolation, access for emergency responders, firefighting strategy, smoke and combustion products, containment of potentially contaminated firefighting water and incident runoff, and post-incident management.

6. Firewater and Environmental Protection

Fire safety and environmental protection should be considered together. In light of the hydrological pathways identified in the applicant's environmental information, the Commission should examine whether a serious incident could result in potentially contaminated firefighting water or other runoff reaching drains, watercourses or downstream environmental receptors.

Where containment is relied upon, its capacity, maintenance and ability to remain effective during a credible emergency should be demonstrated.

7. Technology Lifecycle and Long-Term Maintenance

Battery-storage technology continues to evolve and equipment of this nature may operate or be replaced over many years.

The relevant planning process should address maintenance and replacement, end-of-life battery management and recycling, continued maintenance of safety and monitoring systems, responsibility following any change of operator, and eventual decommissioning and site restoration.

Where future replacement of the BESS involves materially different battery chemistry, technology, configuration or environmental or safety characteristics from those assessed through the relevant planning process, I request that the appropriate planning authority determine whether further planning and environmental assessment is required.

8. Operational Life of the 220 kV Substation

The Commission should consider the proposed operational life and eventual decommissioning arrangements for the 220 kV substation. Where the substation is intended to remain as part of the national electricity grid beyond the operational life of other elements of the Greenhills development, its longer-term effects should be assessed accordingly.

Long-term requirements should address drainage, operational noise, lighting, landscaping, security, maintenance and responsibility following any transfer of ownership or operational control.

9. Clear and Enforceable Mitigation

Where permission depends on mitigation for environmental or community effects to be acceptable, the essential measures should be incorporated into clear and enforceable conditions rather than left for substantive determination through later contractor arrangements.

If permission is granted, I request that appropriate conditions address:

- construction and delivery routes, including school-travel periods where relevant;
- working hours, road-condition surveys and remediation of construction-related damage;
- surface water, pollution-prevention and ecological controls;
- BESS emergency-response arrangements and containment of incident-related runoff;
- operational noise, lighting, landscaping and monitoring;
- long-term maintenance and lifecycle management; and
- decommissioning and site restoration where applicable.

Conclusion

I recognise the strategic importance of renewable-energy generation and electricity-grid infrastructure. That importance should not lessen the requirement for robust assessment of the environmental, safety and community consequences of an individual development.

As a Youghal resident and parent of children attending school in Inch, my concern is whether this development, and its cumulative relationship with the wider Greenhills Renewable Energy Development, have been demonstrated to be acceptable for this location over their full operational lives.

I respectfully request that permission be refused if, following its planning, environmental and Appropriate Assessment processes, the Commission cannot lawfully be satisfied that the proposed development is acceptable having regard to proper planning and sustainable development and the applicable environmental requirements.

If permission is granted, I request that all mitigation necessary to support the Commission's conclusions be incorporated into clear, comprehensive and enforceable planning conditions.

Yours faithfully,

Michelle Lyons

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