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Objection to proposed Substation and Grid Connection

Case 324632

I wish to object to the planning permission sought by Perigus for the above development.

The installation and commissioning of the Greenhills Energy Park in our community can only be viable if An Coimisiún Pleanála (ACP) grant planning for this substation. While we are dealing in this objection with the substation planning only, ACP cannot put their heads in the sand and refuse to see the wider picture of the adjacent proposed solar farm and the awful effects it will cause.

Overall government strategy and grid connections.

Recent research confirms that less than half of customers' bills reflect the cost of the electricity they use. The other costs range from getting that energy from power plants to where it is produced to where it is consumed via the grid to incentives for businesses to build these generators in the first place. When the grid was built almost all generation depended on gas and oil. The addition of incentivised solar and wind farms in an ad hoc unplanned manner, being built not for the good of the state but for profit, has added to the complexity of distributing that electricity on a grid not designed for that purpose. We see locally the wind turbines turned off (and paid to do so by electricity consumers) because the grid is sometimes unable to effectively deliver to consumers the electricity they produce.

It is obvious that the state and Eirgrid need to go back to the drawing board. We do not want to become the victims of this money grab while our state gets its house in order.

We as objectors are reduced to arguing for the protections of birds and otters which are legally enshrined (and which I support) rather than being allowed to have any input or discussion with government or Eirgrid on how and why this project is deemed to be a part of the overall strategy and policy for the addition of renewables to the grid and the strengthening of the grid.

ACP has the power to intervene, to ask these important questions, without fear or favour. Can we depend on this state institution? I look with dismay at the number of renewable projects approved by ACP in the face of local opposition. There is a sense that the powers that be are our betters, and that we local communities should just accept that this is the way it is, and facilitate the enrichment of the few landholders who will benefit, and the company who wishes to access the gravy train.

Yes , we need renewable energy. Let the government grant aid every house holder in the country to install renewables, and tie every farmer's EU handouts to the installation of solar on yards and sheds. Carparks with 'solar roofs', train tracks with solar alongside.....there are better ways than the destruction of our beautiful green land.

Our community and its rural hinterland, landscape, views, and cultural heritage together with the values of our properties will all be significantly damaged. Our waterways, little creatures, protected species, and archeological artefacts are on the brink of a nuclear explosion if this planning is allowed. Spare us the 'mitigation' proposals which the consultants hide behind, which cannot ever be scientifically proven to avert catastrophic damage.

I had to look up the word mitigation. It appears frequently in all the attached reports. It means 'the act of making something less severe, dangerous, painful, harsh or damaging. Mitigation of the many hazardous risks of this substation can be attempted but cannot be accepted in advance or cannot be scientifically proven to eliminate these risks. If the substation is built, we the residents and the wider environment will suffer the consequences if the many mitigations fail.

Lack of community involvement.

The community involvement appendix relates both to the solar farm and BESS and substation so here I must refer to the Perigus solar farm plans as well as this substation planning.

Community involvement has in effect been limited to Perigus telling us what will happen. I think this is best seen in the Perigus preparation of their second planning submission for Greenhills Energy Park to Cork County Council. The first was deemed invalid by CCC. The second application to CCC, despite the Perigus team having had available to it, the considered objections of over four hundred people, many of which pointed to basic and obvious mistakes and concerns, was in most matters identical to the first. Perigus chose to ignore completely these relevant objections.

The community engagement we have seen is a box ticking exercise. Untruths, evasion, unanswered emails and phone calls, inadequate maps, incorrect deadlines and the negotiation of community inducements in private, give great offence to the community.

Vindictive unprofessional comments and insinuations that three valued members of our community are serial objectors, when in fact they have, without reward and at huge personal cost, attempted to protect our community from large scale industrialization do not reflect well on Perigus (Ref page 6 section 8. Greenhills Summary of Engagement Document)

The views of most of the local people have been completely ignored. What can we expect on an ongoing basis if Perigus are given permission to build this substation.

Financial constraints on concerned citizen objectors.

Many expert reports commissioned and paid for by Orsted now Perigus, accompany this report. While in no way wishing to undermine the expertise of those involved in producing these reports, the combined results are in line with and support the objectives of their paymasters, Orsted.

I believe the planning process hugely disadvantages those of us who are older and without adequate financial resources or sufficient professional technological engineering literary and computer skills to contradict the expertise of the hirelings of a major multinational company.

Separation of this planning from it's cojoined terrible twin the Solar Farm

I cannot understand how the planning sought for this substation can be separated from the planning sought for Greenhills solar park. The proposed substation has no valid purpose other than to upload electricity created by the adjacent solar farm to the grid.....or worse download energy for what might be deemed a grand location for a data centre in the future.

Unfair burden on our community

Based on the Orsted community information leaflet the government's target for utility scale solar in 2030 is 5500Mw. We in Ireland currently have 594MW. We in Greenhill's catchment or entrapment area are expected to carry the burden of five percent or one twentieth of the total country's requirement. No court of law can deem it fair or equitable that our community must bear this disproportionate burden.

Landscape and trauma

I am rooted in this community, with a great love of the land, the wild spaces, the little creatures and nature in all its abundance. The transformation to a monstrous industrial site which will follow from the disfiguration of two point two hectares with attendant lights, cameras, metal fences, enclosing metal and concrete structures under the

shadow of the historic Rath Fort seems totally bizarre in these green fields. It is apparent by their money grab that neither Perigus nor the landowners, place any value on community, landscape, cultural and folk history, health and safety, and nor do they give consideration to the best interests of the surrounding community.

The technical stuff

May I start with a statement from the NIS submission accompanying this planning submission.

“there exists the potential for adverse effects to the integrity of BlackwaterRiver (Cork/Waterford) SAC via contamination (run off hydrocarbons, depressing fish biomass and water quality) spread of invasive species and disturbance (noise vibration,human presence)

An Appropriate Assessment for screening and Natura Impact Statement (NIS) were prepared by Inis Environmental Consultants the company hired and paid by Orsted. The reports are critically important and in effect ‘following mitigation’ give Perigus the result they need to proceed to the next stage of the process. Both these reports were submitted to Cork County Council in support of the planning application for Greenhils Solar Farm and accompany the planning application submitted to an ACP for the substation permission. I think it is true to say that the AA and NIS relate to the overall Greenhills Project and in effect ACP are making a judgement in the absence of a Natura Impact Statement dedicated to the substation area.

Given the protected status of Blackwater (Cork/Waterford SAC and SPA under European the unjustified exclusion of relevant SCIs and Q1s, the absence of up to date, comprehensive and independent surveys of the biomass of the Tourig , and of otter habitats and population, and given also the illogical and unexplained rationale of the substation site location and site compound, the topography, the geology, the extent of cut and fill and the pollutants on site (concrete, hydrocarbons, waste), I believe that this proposed development is capable of causing great damage to legally protected habitats and must not be granted planning permission.

Given that Perigus commissioned the reports and hence, that they are not independent, and that they contain incorrect assumptions and factual errors, I ask that an independent AA and NIS be commissioned for this substation planning by ACP.

I am conscious of my lack of a relevant professional qualification in analyzing these reports, but I think if I, the common lay person, can point to flaws outlined below what riches might be found by competent and independent professionals.

Factual errors and incorrect assumptions in AA and NIS

The AA concludes that (Ref. Greenhills -aa-screening-nis report page 96)

‘The proposed development cannot be determined as unlikely to give rise to significant effects on the Q1s of SACs in view of best scientific knowledge and in view of the COs of of the European sites concerned.’ (This translates to, yes, the proposed development can cause significant effects to Blackwater River (Cork/Waterford) SAC.)’ in the contorted language of the report.

The conclusion of the NIS report that following mitigation is that ‘The Proposed development is not likely to give rise to significant effects on the SCIs in view of best scientific knowledge and in view of the CO’s of the European sites concerned’.

I argue that this cannot be accepted as the ‘best scientific knowledge’ and that any independent observer cannot accept that the above is true.

The basis for this pronouncement that ‘ the proposed development is not likely to give rise to significant effects….’ is the absence of a specific list of birds (Golden Plover, Lapwing, Dunlin, Black-tailed Godwit, Bar tailed Godwit, Curlew, Redshank, Wigeon) during brief infrequent and time limited surveys on intermittent days in what is now a dated historic scenario. Inis Env. states that the following SCI’S were ‘not recorded onsite during bird surveys ‘and on that basis ‘no further assessment of this species is required’. How can the results of these inadequate unsupervised surveys, commissioned by vested interests, possibly be classed as ‘best scientific knowledge’.

Natura Impact Statement. Ref Page 107/ 108

Inis report states that ‘the marked distribution of River Lamprey juveniles and spawning sites does not indicate the presence of either in the Tourig river’ And references (King et al 2004).

From what I can see, in the King Report commissioned for NPWS, the Tourig river was not sampled for river, sea or brook lamprey. In any case, the presence or otherwise of a species in **2004 d**oes not provide sufficient scientific data to decide if that species is now resident in the Tourig River.

Salmon.

Inis report says ‘the marked distribution of salmon does not indicate the presence of juveniles in the Tourig river (Inland Fisheries 2020). Local knowledge indicates the presence of salmon upriver from Park in recent years.

The poor badgers.

Badgers have been resident on the bank of the ‘Knocknagappagh’ stream in the field where the substation is proposed to be built for as long as the oldest residents of the parish can recall. This badger sett is noted in the AA report. They have clung on in one of the very few surviving ditches remaining on this substantial dairy farm where everything not necessary for the production of milk has been removed and destroyed. They are one

of the remaining native species in what is an ecological desert. Another powerful reason to move the substation eastward in the unfortunate event of it receiving planning. The badgers may of course have conveniently decided to leave to reduce the Perigus workload.

Addressing the environmental damage already inflicted in this community.

Is a 220kv substation and cojoined twin evil, the solar farm, better than the ecological desert which is the product of intense commercial dairying? Better that the custodians of our land, the Irish government monitor our lands and rivers properly without fear or favour of the enormously powerful farm lobby.

Property devaluation.

I live about 500metres from the proposed substation. I am now an elderly widow. The option of selling my house and moving to a village nearby if I can no longer drive or suffer ill health, has become impossible because of the proposed substation. The prolonged nature of attempting to get planning, the gross incompetence of Perigus as instanced by their application being already twice deemed invalid by the planning authorities, and the technical issues in planning an outage on a major 220kv line if planning is granted will have us local people in limbo for ten years. Major life decisions of the surrounding community are put on hold without any compensation or relief. Houses or sites locally are not selling, or if they do, they sell at a much-reduced value as a direct consequence of the proposed substation and its cojoined twin the solar farm and young people are no longer building, in effect draining the life blood from the area. Perigus fiddling while Inch burns.

Site compound location next to the substation.

Why is the site compound at this location alongside the substation. This is a huge farm with significant road frontage on level easily accessed sites. These roadside locations could also be easily monitored by the passing public. There is already considerable infrastructure on the farm which could easily house, if available, a huge site compound. Either of these options would substantially reduce unnecessary digging and levelling, concrete use, construction and destruction of habitats. The company's green credentials are found wanting here. There is a sense here of hiding away in the most inaccessible field on the farm. Why?

Location of the substation

There may be some engineering reasons I am unaware of, but the location of the substation is a cause of concern. This location drains into the Knocknacappagh stream with a steep downhill gradient. The possibility of pollutants, diesel oil silt etc to entering the river at this point must be great. The field formerly known as Cronin's Bogs is perhaps one of the wettest fields on the farm. The test holes were dug on the 22nd July 2025 during a really dry summer. I note that the percolation tests state that further boreholes are

required, and a raft foundation may be necessary for the substation. The necessity of cut and fill huge quantities of concrete and the intended location of the main site compound make this the worst possible site on the farm.
Since the substation is located internally on the farm who will own this access when the substation becomes the property of the state. There appears to be a much better level site underneath the 220kv line and adjacent to the public road to the east of this location. The argument that it will be less visible tucked away in a corner of the farm is a nonsense given the height and visibility of the proposed structures and given the visibility of the terrible twin 800 acres of glass and steel.
Why are the public and specifically those who live in this area excluded from the discussions by the planning process for what is deemed essential infrastructure by a cosy arrangement between the vested interests of landowners, Perigus and EirGrid. Since the substation if built will become the property of the state, we as citizens of that state cannot be expected to accept without explanation the rationale for these decisions

Permanent loss of the night sky.
We are fortunate to have a wonderful view of the night sky with the constellation Pegasus visible clearly in the southeastern sky keeping watch over the substation site. Our rural area has low ambient light levels making it sensitive to the addition of significant artificial light sources. We already see this loss locally where farmers use powerful always on lights to light their farmyards. The night lighting of the substation will alter irreparably the view of the night sky to the south and southeast.

Screening of the structures not possible

The sheer ugliness of the proposed structures landing like a scud missile in the middle of what are now pristine rural fields will completely and permanently alter the nature of the townlands. All of what are alien structures using materials that are incongruous with and hostile to the rural green field site can never be effectively screened to help the structures sit well in the landscape. Trees which might screen the bulk of the structures would need to be 100metres high given the topography of the land. The ridiculous proposal to stuff some solar panels into the southwestern and northern boundary of this site instead of utilising that space to create a native woodland to lessen the environmental damage shows the greed and lack of vision of the proposers. Can ACP insist, if permission is given, that at least half of this 2.2 hectares site be planted with native woodland?

Electrical and electronic interference.
I am sure some consultant was paid to produce a survey saying there would be no measurable interference, nothing to see here, move on. I have hearing aids. I walk near the adjacent 220kv lin and my hearing aids pick up lots of electronic noise or buzzing. It is particularly pronounced on wet days. Hardly a quantifiable scientific measurement, but enough for me to know that there will be electronic consequences.

Likely obselence within a short time frame.
I don't think anyone can say for certain how soon utility solar farm will become obsolete except that there is no doubt it will happen. Two simple facts. The Japanese are trialling wrap around flexible solar panels on their data centres. The Chinese have figured out how to produce electricity from solar powered see through glass....every window in the world capable of being a contributor to green energy. Not to mention Elon building in space! By the time this energy park is completed it will be outdated. What then will be the purpose of the substation?

What are the chances of a data centre here also?
Is the building of the substation and its malign twin, the solar farm, the first stage of development of a data centre. With all its required components in place and the availability of adequate land, will a data centre be pushed down our throts in time to come? Is it possible for ACP, if it approves this substation, to restrict the substation use to the uploading of available power to the grid, and direct that the substation not be allowed to facilitate the drawdown of power?

Geological survey not completed in this location.
The Archaeological, Architectural and Cultural Heritage Baseline Impact Assessment accompanies this planning application. Cork County Council requested a geophysical report for the whole project including the substation 'field'. As far as I can see from the geophysical data maps submitted, the area where the substation is intended to be located was not surveyed. Perigus stated in their application to Cork County Council for the solar farm and BESS (which includes this location) that 'due to crops growing or ground conditions' they were unable to complete the survey on 42 hectacres. Perigus appear to believe that they can build a major infrastructural project on this site involving a huge cut and fill , but they were unable to complete a geophysical survey on the same ground? Are the planning authorities going to stand idly by to facilitate this sleight of hand?

I include some photographs of the site, in the hope that it will help ACP planners to appreciate the damage that will be done to the environment by granting permission.



Substation site from Barnaviddane underpass



Substation site from Barnaviddane



Substation site top right shown from Barnaviddane boreen



Substation site from adjacent field just south of Barnaviddane underpass



Substation site in the surround green hinterland