Ballydaniel,

Lackaroe.

Youghal,

Co. Cork.

30th October 1016

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

RE: THIRD-PARTY OBSERVATION – CASE VA04.324632

Proposed Development: 220 kV Air-Insulated Substation and Loop-In Grid Connection, Greenhills, Co. Cork

Applicant: Perigus Energy Ireland Midco Limited

Location: Ballyneague, Ballydaniel and Knocknagappagh, County Cork

Dear Commissioners,

I wish to make a formal third-party observation objecting to the proposed 220 kV substation and associated grid connection infrastructure at Greenhills, County Cork.

I am a local resident whose home overlooks the area affected by the proposed Greenhills Renewable Energy Park substation.

The development would have a substantial impact on the principal view from my home and would fundamentally alter the rural landscape which forms an important part of my family's everyday living environment.

I support the principle of renewable energy generation and recognise the importance of Ireland's climate commitments. However, I do not accept that these objectives justify the introduction of permanent industrial-scale infrastructure at a location where the effects on neighbouring properties, landscape character and the environment have not been satisfactorily demonstrated to be acceptable.

Having reviewed the applicant's supporting planning documents, including the Planning and Environmental Report, Landscape and Visual Impact Assessment and Environmental Impact Assessment Screening Report, I have serious concerns regarding the adequacy of the information presented.

I respectfully request that An Coimisiún Pleanála refuse permission for the following reasons.

1. Inadequate assessment of the visual impact on my home

Relevant application documents:

- Appendix O – Landscape and Visual Impact Assessment, Sections 1.5, 1.6 and 1.7.
- Appendix O – Figures 1.13 and 1.14.
- Planning and Environmental Report – Landscape and Visual Impact Assessment.
- TLI Group substation layout and elevation drawings.

Relevant legislation and policy:

- Cork County Development Plan 2022–2028, Objective GI 14-9 – Landscape.
- Objective GI 14-12 – General Views and Prospects.
- Planning and Development Act 2000, as amended.
- European Landscape Convention.

My principal objection concerns the impact that the proposed infrastructure and its associated development would have on the landscape visible from my home.

The existing outlook is predominantly rural and agricultural, characterised by fields, hedgerows and open countryside.

The proposal would introduce a major industrial electricity installation into this landscape.

The infrastructure includes an air-insulated substation, gantries, transformers, electrical equipment, fencing, new electricity masts and a telecommunications structure.

I am particularly concerned that the applicant's Landscape and Visual Impact Assessment does not adequately address the impact on individual residential properties.

The assessment uses representative viewpoints largely selected from public roads and publicly accessible locations.

However, the primary outlook from an established home is not necessarily represented by a roadside viewpoint.

A public road photograph cannot automatically be considered an adequate substitute for an assessment from the principal living areas and gardens of a nearby residence.

This is especially important where a home is elevated or has direct views towards the development.

The applicant's methodology recognises the sensitivity of residential receptors. Nevertheless, the documentation does not demonstrate that the principal view from my property has been individually and accurately assessed.

I request that the Commission require a verified, property-specific visual assessment demonstrating the proposed infrastructure from the principal outlook of my home.

Such an assessment should identify the scale and prominence of the substation, gantries, masts, fencing, associated lighting and any related developments visible in the same landscape.

I submit that the absence of an adequate residential viewpoint assessment creates uncertainty concerning the true impact of the proposal on established residential amenity.

2. Permanent industrial infrastructure and the long-term loss of rural landscape character

Relevant application documents:

- Planning and Environmental Report, Section 5, Description of the Proposed Development.
- Planning and Environmental Report, decommissioning provisions.
- Appendix J – Decommissioning and Restoration Plan.
- Appendix O – Landscape and Visual Impact Assessment.
- Appendix H – 220 kV Grid Connection Outline Construction Methodology.

Relevant Development Plan objectives:

- GI 14-9 – Landscape.
- GI 14-10 – Draft Landscape Strategy.

- ET 13-2 – Renewable Energy.
- ET 13-21 – Electricity Network.

A particularly serious concern is that the proposed substation is not intended to be temporary infrastructure.

The applicant's documentation identifies the 220 kV substation and grid connection as infrastructure intended to remain after the associated solar generation and battery storage facilities have been decommissioned.

This distinction is fundamental to the planning assessment.

The effects of a permanent electrical installation cannot properly be justified solely by reference to the proposed operational lifespan of the solar farm.

The proposed infrastructure includes substantial above-ground structures and would establish an enduring industrial feature within an agricultural landscape.

According to the planning material, the telecommunications structure and lattice support infrastructure are of significant height, while other elements include extensive steelwork, electrical equipment and security fencing.

I request that the Commission consider the long-term and potentially permanent effects of this installation, including the landscape after the removal of the proposed solar farm.

I also question the proportionality of granting permission for a permanent grid installation where the related solar development is subject to a separate planning decision.

It would be unacceptable for the surrounding community to be left with a permanent industrial installation without its long-term landscape effects having been comprehensively assessed.

3. Conflict with Cork County Development Plan landscape protection objectives

Relevant application documents:

- Appendix O – Landscape and Visual Impact Assessment, Sections 1.3 and 1.4.
- Appendix O – Landscape Character Assessment and Figures 1.4 and 1.14.
- Planning and Environmental Report – Planning Policy Assessment.

Relevant Cork County Development Plan objectives:

- GI 14-9 – Landscape.
- GI 14-10 – Draft Landscape Strategy.
- GI 14-12 – General Views and Prospects.

The Landscape and Visual Impact Assessment identifies the landscape context of the proposed development.

The site is situated within Landscape Character Type 10b, Fissured Fertile Middleground, which is identified in the County Development Plan landscape framework as having high landscape sensitivity.

Although the land is not itself within a designated High Value Landscape, this does not mean that it is insensitive to substantial physical development.

Objective GI 14-9 seeks the protection of the visual and scenic amenities of County Cork, including consideration of siting, design and the protection of skylines, ridgelines and landscape character.

I am concerned that the construction of a permanent 220 kV substation and associated grid structures would introduce infrastructure that is incompatible with the existing agricultural character of the area.

The landscape surrounding my home is not an industrial landscape.

It is a working rural environment whose agricultural pattern and open views contribute to its character and visual amenity.

I submit that the applicant has not adequately demonstrated how the proposed infrastructure can be satisfactorily integrated into this sensitive landscape.

I request that the Commission undertake a specific assessment of compliance with Objectives GI 14-9, GI 14-10 and GI 14-12.

4. Reliance on screening measures that do not adequately mitigate the substation

Relevant application documents:

- Appendix O – Landscape and Visual Impact Assessment, Section 1.5.
- Appendix O – Landscape Mitigation Figures.
- Appendix D – Biodiversity Enhancement Management Plan.

Relevant Development Plan objective:

- GI 14-9 – Landscape.

I am concerned that the applicant's visual mitigation proposals rely significantly on vegetation and landscape planting associated with the wider solar farm development.

Such measures may reduce visibility of ground-mounted solar panels over time.

However, they cannot necessarily provide effective screening of the taller elements of a 220 kV electricity substation, including overhead structures, gantries and transmission masts.

Furthermore, the visual mitigation associated with the solar farm is subject to the separate planning application before Cork County Council.

I request clarification as to which mitigation measures form an enforceable part of the current application and which depend upon the approval and implementation of the separate solar farm permission.

The effectiveness of visual screening must also be considered in the context of elevated residential viewpoints, seasonal changes and the time required for new vegetation to mature.

I submit that it would be inappropriate to conclude that the substation would have no significant visual effects where that conclusion depends upon planting which may not be secured by the permission under consideration or which cannot physically screen the tallest infrastructure.

5. Failure to adequately consider permanent lighting and night-time visual impacts

Relevant application documents:

- Planning and Environmental Report – Substation Infrastructure Description.
- Appendix O – Landscape and Visual Impact Assessment.
- Substation Site Layout and Elevation Drawings.

Relevant Cork County Development Plan objectives:

- GI 14-9 – Landscape.
- Relevant biodiversity and residential amenity objectives.

The applicant's planning documentation provides for lighting associated with the proposed substation.

I am concerned that the visual consequences of such lighting have not been adequately assessed from nearby residential properties.

The introduction of operational or security lighting to a previously rural landscape could alter its night-time character.

The assessment should clearly identify the proposed lighting equipment, its operating arrangements, predicted illumination levels at sensitive receptors and measures to avoid unnecessary light spill.

I request that the Commission establish whether a detailed lighting design, lux assessment and night-time residential visual assessment have been supplied.

Any potential aviation lighting associated with tall structures should also be identified and assessed where relevant.

I submit that the effect of permanent lighting is a material planning consideration and should not be left uncertain until after permission has been granted.

6. Separate planning applications and inadequate assessment of the complete development

Relevant application documents:

- Planning and Environmental Report, Sections 3 and 4.
- EIA Screening Report, August 2026.
- Overall Site Layout Drawings.
- Appendix O – Landscape and Visual Impact Assessment.
- Appendix K – Ecological Impact Assessment.

Relevant legislation and case law:

- Environmental Impact Assessment Directive 2011/92/EU, as amended.
- Planning and Development Act 2000, as amended.
- O'Grianna v An Bord Pleanála [2014] IEHC 632, subject to subsequent legal developments.

The proposed substation is intended to facilitate the connection of the wider Greenhills Renewable Energy Park to the national electricity grid.

However, the solar farm, battery storage facilities and associated works are the subject of separate planning applications.

The solar farm application is identified as Cork County Council reference 26/2133 which has now been made invalid.

I am concerned that the division of the project between separate consenting authorities creates a risk that the overall environmental and residential impacts may not be comprehensively assessed.

The substation cannot reasonably be considered in complete isolation from the solar farm it is intended to serve.

Equally, the permanent effects of the substation cannot be dismissed by relying on environmental conclusions relating primarily to the solar arrays or the temporary operational life of the wider renewable energy project.

I request that An Coimisiún Pleanála examine whether the application provides an adequate assessment of the proposed substation individually and of the cumulative and in-combination effects of the entire functionally related development.

The assessment should also clearly distinguish works included within this permission from those dependent upon separate approvals.

7. Inadequate justification for the development of permanent infrastructure on agricultural land

Relevant application documents:

- Planning and Environmental Report – Site Description and Development Description.
- Appendix N – Land, Soils, Geology, Hydrology and Hydrogeology Assessment.

- Appendix J – Decommissioning and Restoration Plan.

Relevant policy:

- Cork County Development Plan Chapter 5 – Rural.
- Chapter 8 – Economy and Employment.
- Chapter 13 – Energy and Telecommunications.
- Objective GI 14-9 – Landscape.

The proposed substation would represent a permanent change in the use and character of agricultural land.

I am concerned that the applicant has not sufficiently justified why this particular rural location should accommodate an enduring high-voltage electrical installation.

The absence of a specific zoning designation does not remove the requirement to demonstrate that the proposal represents proper planning and sustainable development.

I request that the Commission consider whether reasonable alternative locations, reduced footprints or different infrastructure arrangements could achieve the grid connection objective while causing less harm to residential amenity and landscape character.

8. Unresolved drainage, earthworks and potential water impacts

Relevant application documents:

- Appendix B – Drainage Plan.
- Appendix C – Site Investigation Report.
- Appendix N – Land, Soils, Geology, Hydrology and Hydrogeology Assessment.
- Appendix H – 220 kV Grid Connection Outline Construction Methodology.
- Cut and Fill Drawing 300101185-DR-213.

Relevant legislation and policy:

- EU Water Framework Directive 2000/60/EC.
- European Communities Environmental Objectives (Surface Waters) Regulations 2009, as amended.
- Cork County Development Plan Objectives WM 11-10, WM 11-12, WM 11-14 and WM 11-15.
- *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009), as relevant.

The proposed substation requires substantial groundworks and changes to the existing landform.

I am concerned by apparent inconsistencies between the estimated excavation and fill quantities presented in different application documents.

The cut-and-fill drawing identifies approximately 17,304 cubic metres of excavation and 34,649 cubic metres of fill, while other sections of the application describe the groundworks using different quantities and assumptions.

These discrepancies require clarification.

I am also concerned that elements of the drainage proposals are identified as requiring further detailed design.

Given the scale of the earthworks and the permanent nature of the installation, it is essential that adequate information be available at the planning stage to demonstrate that surface water runoff, attenuation, groundwater protection and downstream water quality can be satisfactorily managed.

I request that the Commission examine the hydrological consequences of the substation as distinct from the wider solar farm.

Particular attention should be given to the potential pathways connecting the development lands to downstream watercourses, including the Tourig catchment and ultimately the Blackwater system. The river tourig is the sole water source of drinking water for the nearby town of Youghal.

The Commission should be satisfied that the proposal will not cause unacceptable flooding, pollution or deterioration of water quality.

9. Traffic, heavy vehicles and construction impacts

Relevant application documents:

- Appendix M – Traffic Impact Assessment.
- Appendix H – 220 kV Grid Connection Outline Construction Methodology.
- Planning and Environmental Report – Traffic and Transport.
- Proposed access and road layout drawings.

Relevant Development Plan objectives:

- TM 12-13 – National, Regional and Local Road Network.
- Relevant development management provisions concerning road safety and access.

The construction of the proposed substation would involve substantial movements of construction vehicles, delivery of heavy electrical equipment and transport of earthworks materials.

I am concerned that the roads surrounding the development, including the L7829 (where I live) and the proposed access arrangements from the R634, may experience significant disruption.

The suitability of the entire proposed delivery route, including abnormal loads, requires careful scrutiny.

I request that the Commission ensure that the traffic assessment specifically addresses the infrastructure for which this permission is sought and does not depend upon road improvements or access arrangements that are subject to separate planning permission.

It is essential that the safety and amenity of local residents and road users are protected throughout the construction period.

10. Adequacy of EIA screening and cumulative effects

Relevant application documents:

- EIA Screening Report, August 2026.
- Planning and Environmental Report, Section 8.
- Appendices K, M, N, O and S.

Relevant legislation:

- Directive 2011/92/EU, as amended by Directive 2014/52/EU.
- Planning and Development Regulations 2001, Schedules 5 and 7, as amended, insofar as applicable.
- Planning and Development Act 2000, as amended.

I note that the applicant has concluded that a full Environmental Impact Assessment Report is not required.

I respectfully question whether the screening assessment adequately addresses the specific and permanent nature of the substation, as well as its functional relationship with the wider renewable energy development.

The EIA screening process must consider all relevant characteristics of the project and likely significant effects, including cumulative effects with other existing and permitted development.

I request that the Commission independently assess whether the full project has been correctly described and screened, whether all relevant development categories have been considered and whether the evidence is sufficient to justify the applicant's conclusions.

Where likely significant environmental effects are identified under the applicable legal framework, a full Environmental Impact Assessment must be undertaken.

11. Impact on the peaceful enjoyment and residential amenity of my home

Relevant legislation:

- European Convention on Human Rights Act 2003, Section 3.
- Article 8 of the European Convention on Human Rights.
- Article 1 of Protocol No. 1, where relevant.
- Relevant provisions of the Planning and Development Act 2000, as amended.

My home is not simply a viewpoint on a landscape map.

It is the place in which my family lives and spends much of its time.

The surrounding countryside forms an important part of the residential environment that we experience every day.

The introduction of permanent industrial electrical infrastructure into the principal outlook from my home would represent a substantial change.

I recognise that planning law does not guarantee an unrestricted or permanently unchanged view.

Nevertheless, I respectfully submit that the degree of interference with established residential amenity, when considered alongside the scale, permanence and potential environmental effects of the development, is a material issue requiring careful assessment.

Article 8 of the European Convention on Human Rights may be relevant where sufficiently serious environmental interference affects the enjoyment of a person's home.

I therefore request that the Commission ensure that a fair and proportionate balance is struck between the public objectives advanced by the proposal and the interests of neighbouring residents.

That balance cannot properly be established without an adequate assessment of the effects on the homes most directly affected.

12. Impact on the archaeology in our community

Our community is abundant in archaeology. In particular just 700 meters from the proposed site is one of Irelands most impressive forts – Rath fort. Rath fort has many souterrains which could potentially lead beneath the proposed site as there are 3 other forts in close proximity to the proposed site and they could well all be conjoined. Also is very close proximity is Ardagh graveyard and church. It is of paramount importance to preserve our history.

13. Conclusion and request for refusal

For the reasons set out in this submission, I respectfully request that An Coimisiún Pleanála refuse permission for the proposed 220 kV substation and associated grid connection.

I submit that the application has not satisfactorily demonstrated that the proposed development can be accommodated at this location without unacceptable effects on the surrounding rural environment and residential amenities.

My principal concerns are:

1. The absence of an adequate assessment from my own home and other nearby residential properties.
2. The permanent industrial character of the proposed substation.
3. The potential conflict with Cork County Development Plan landscape and amenity protection objectives.
4. The reliance on visual screening associated with a separate planning application.
5. Inadequate information concerning night-time lighting and residential visual impacts.
6. Uncertainty arising from the separation of functionally related planning applications.
7. Apparent inconsistencies in earthworks quantities and unresolved drainage matters.
8. The need for a rigorous assessment of cumulative effects and the adequacy of EIA screening.

I specifically request that the appointed planning inspector visit the vicinity of my home and assess the proposed development in the context of its existing residential and rural landscape setting.

I also request that the Commission consider whether verified residential photomontages and further information are necessary before a decision can lawfully and properly be made.

I support renewable energy development where it is appropriately located, adequately assessed and compatible with the surrounding environment.

However, I believe the proposed Greenhills substation would introduce an unacceptable and permanent industrial feature into a sensitive rural landscape, without sufficient assessment of the consequences for those who live beside it.

For these reasons, I respectfully request that permission be refused.

Yours faithfully,

Teresa Carey



View from our home – arrow highlights where the proposed substation could be.