Planning Application Ref: **VA04.324632**

Teresa Murphy

Monavarnogue

Killeagh

County Cork

16 October 2026

The Secretary,

Planning Department,

Cork County Council,

County Hall,

Carrigrohane Road,

Cork.

RE: FORMAL OBJECTION TO STRATEGIC INFRASTRUCTURE DEVELOPMENT APPLICATION

CASE REFERENCE: VA04.324632

PROPOSED DEVELOPMENT: 220kV Air Insulated Substation (AIS), Loop-in Grid Connection and Associated Infrastructure at Greenhills Solar Farm, County Cork

LOCATION: Townlands of Ballyneague, Ballydaniel and Knocknagappagh, County Cork.

Dear Sir/Madam,

1. INTRODUCTION AND SUMMARY OF OBJECTION

I wish to lodge a formal and emphatic objection to the proposed development under An Coimisiún Pleanála reference VA04.324632.

The application concerns substantial electrical infrastructure intended to facilitate the connection of the Greenhills Solar Farm to the national electricity grid. Although the development is presented as grid infrastructure, it cannot properly be considered in isolation from the solar farm it is intended to serve, the surrounding rural environment, the existing and permitted renewable energy developments in the area, or the cumulative effects on the local community and environment.

The proposed 220kV Air Insulated Substation and loop-in grid connection represent significant infrastructure in a rural setting. Their construction and operation have the potential to cause lasting environmental, landscape, ecological and residential impacts, together with additional pressure on a local road network that is already in poor condition

and is not suitable for substantial volumes of heavy construction traffic without proper assessment and demonstrable mitigation.

I submit that the application must be examined with particular scrutiny in respect of:

- The adequacy of the environmental impact assessment and the assessment of the development in combination with the Greenhills Solar Farm and other relevant projects.
- The cumulative impact of renewable energy and associated electrical infrastructure on the rural character and amenity of the area.
- The condition, capacity and safety of the local road network, including the L7828, L7829 and L38032.
- Archaeological heritage and the protection of the historic landscape.
- Biodiversity, hedgerows, habitats and ecological connectivity.
- Surface-water drainage, flood risk, soil disturbance and water quality.
- Construction noise, operational noise, electrical infrastructure impacts and residential amenity.
- The necessity, siting, scale and design of the proposed infrastructure and the adequacy of alternatives considered.

For the reasons set out below, I respectfully request that An Coimisiún Pleanála refuse permission unless it can be conclusively demonstrated, on the basis of a complete and robust assessment, that the proposed development would not result in unacceptable environmental harm, adverse effects on residential amenity, or unacceptable cumulative impacts.

2. FAILURE TO ASSESS THE DEVELOPMENT IN ITS FULL CONTEXT

The proposed substation and grid connection are integral to the wider Greenhills Solar Farm project. Their environmental implications cannot reasonably be assessed by treating the electrical infrastructure as a separate or self-contained undertaking.

The Commission must examine the functional relationship between this application and the associated solar farm, including all relevant construction works, access arrangements, grid infrastructure, cable routes, drainage, land clearance, temporary compounds and ancillary development.

The assessment must consider the overall effects of the complete project, rather than dividing the development into separate planning applications in a manner that could obscure its full environmental footprint.

In particular, the Commission should establish whether the environmental documentation adequately accounts for the combined effects of the solar farm and grid infrastructure on landscape character, biodiversity, archaeology, traffic, noise, water management and nearby residents.

The assessment must also address the cumulative effects of other existing, permitted and reasonably foreseeable developments in the surrounding area. These effects are not eliminated simply because individual projects are subject to separate planning applications.

I object to any approach that would result in the environmental consequences of this substantial development being underestimated through piecemeal assessment.

3. CUMULATIVE IMPACTS OF RENEWABLE ENERGY DEVELOPMENT

The surrounding area is already affected by significant renewable energy development proposals, including the Greenhills Solar Farm and the permitted Lyrenacarriga Wind Farm, associated with An Bord Pleanála reference ABP-309121-21.

The Commission should assess the cumulative impact of these developments, including their associated infrastructure, construction activity, electrical installations, access requirements and long-term effects on the rural landscape.

The cumulative impact must be considered from the perspective of those living in the area, using local roads and experiencing the physical and visual changes to the surrounding countryside.

The fact that individual developments may be capable of being justified on their own does not establish that their combined impacts are acceptable. Repeated industrial-scale development can fundamentally alter the character of a rural area, placing disproportionate pressure on local infrastructure and communities.

The Commission should therefore require a comprehensive cumulative impact assessment that identifies all relevant projects, explains the methodology used and demonstrates that the combined effects have been properly evaluated.

If the applicant has failed to consider relevant projects or has relied on incomplete information, the Commission should not grant permission on the basis of an inadequate assessment.

4. LOCAL ROAD NETWORK, CONSTRUCTION TRAFFIC AND ROAD SAFETY

I have serious concerns regarding the capacity and condition of the local road network to accommodate the construction traffic associated with the proposed development.

The L7828, L7829 and L38032 are of particular concern. These local roads are already damaged and, in my view, are not capable of accommodating substantial additional heavy goods vehicle traffic without a material risk of further deterioration and road safety problems.

Construction of a 220kV substation and associated grid infrastructure will involve the delivery of substantial quantities of construction materials, plant, equipment and electrical components. Depending on the construction methodology and delivery arrangements, some loads may be exceptionally heavy or oversized.

The Commission should not accept general assurances that construction traffic can be accommodated without requiring a detailed and site-specific assessment of the actual road conditions and the proposed transport arrangements.

The application should demonstrate:

1. The existing structural condition, width, alignment, load-bearing capacity and drainage condition of each affected local road.
2. The number, type, frequency and duration of anticipated HGV movements, including deliveries of abnormal or oversized loads.
3. The suitability of junctions, bends, passing places and access points for the proposed vehicles.
4. The effects on pedestrians, cyclists, agricultural traffic, local residents and other road users.
5. The cumulative traffic burden arising from the construction of the solar farm, substation, grid connection and other relevant developments.
6. The proposed arrangements for road condition surveys, damage prevention, repairs, monitoring and enforcement.

A construction traffic management plan is not, by itself, proof that an unsuitable road network can safely accommodate the proposed development.

The applicant must establish that the roads are physically capable of accommodating the anticipated traffic and that effective, enforceable measures will prevent unacceptable deterioration and protect public safety.

It would be unreasonable to transfer the consequences of a private commercial development onto the local community through damaged roads, increased hazards, disruption and the prospect of prolonged repair works.

In the absence of a satisfactory, independently verifiable assessment demonstrating that the proposed traffic can be accommodated safely and without unacceptable damage, this is a substantial ground for refusing permission.

5. ARCHAEOLOGICAL HERITAGE AND HISTORIC LANDSCAPE

The archaeological implications of the wider Greenhills Solar Farm development require particular attention. Previous concerns identified in relation to the associated project include approximately 42.85 hectares of land not covered by the relevant archaeological survey work, geophysical anomalies identified as M1–M4, and the recorded monument CO056-004.

The Commission should establish whether these matters are relevant to, or could be affected by, the footprint and associated works of this application. They must not be assumed to have been resolved merely because the substation and grid connection are being considered under a separate reference.

The assessment should identify all recorded monuments, archaeological sites, areas of archaeological potential and historic landscape features that could be affected directly or indirectly by the proposed development.

The potential for previously unrecorded archaeological material must also be addressed, particularly where ground excavation, foundations, cable trenches, access works and other construction activities are proposed.

Archaeological assessment should be proportionate to the scale and nature of the works and should be undertaken before permission is granted where the information is necessary to determine the acceptability of the development.

A condition requiring archaeological monitoring during construction would not necessarily remedy a fundamental deficiency in the information available to the Commission when deciding whether the development should be permitted in the first place.

The Commission should refuse permission if the archaeological resource, the setting of protected or recorded monuments, or the wider historic landscape cannot be adequately protected.

6. LANDSCAPE CHARACTER AND VISUAL AMENITY

A 220kV Air Insulated Substation is substantial electrical infrastructure and is materially different in character from the agricultural landscape in which it is proposed.

The proposed installation and associated electrical equipment, structures, security fencing, lighting, access infrastructure and ancillary works may introduce a prominent and industrial appearance into the rural environment.

The assessment must address the actual visibility of the development from nearby dwellings, public roads, surrounding farmland and other relevant viewpoints. It must also consider the cumulative visual effect of the substation in combination with the solar farm, the permitted Lyrenacarriga Wind Farm and other relevant infrastructure.

The Commission should examine whether the proposed location and design represent an appropriate response to the receiving landscape, and whether alternative locations, configurations or designs could materially reduce the impact.

Any proposed screening must be assessed realistically, taking account of the height and nature of the electrical infrastructure, the time required for planting to mature, seasonal conditions and the long-term effectiveness of the measures proposed.

Screen planting cannot be treated as a complete solution where the scale, location or industrial character of the development would remain fundamentally inappropriate.

The Commission should not permit the gradual industrialisation of this rural landscape without a convincing demonstration that the overall impact is acceptable.

7. BIODIVERSITY, HEDGEROWS AND ECOLOGICAL CONNECTIVITY

The Commission must be satisfied that the development will not cause unacceptable damage to habitats, hedgerows, trees, wildlife corridors or protected species.

The wider Greenhills Solar Farm proposal has raised concerns regarding substantial hedgerow removal, previously identified at approximately 395 metres. The Commission should establish whether the present application involves further removal, disturbance or fragmentation of these or other ecological features.

Hedgerows and field boundaries can provide important nesting, foraging and commuting habitat. Their value cannot be assessed solely by reference to the area of land occupied by the substation itself.

The ecological assessment must consider the full construction footprint, temporary works, access routes, cable trenches, vegetation clearance, lighting, drainage and any indirect disturbance.

Where surveys have been undertaken, their scope, timing and methodology must be sufficient to establish the ecological conditions of the site. Any material gaps should be addressed before a decision is made.

Mitigation should be specific, deliverable and enforceable. General commitments to biodiversity enhancement should not be used to offset the loss of established habitats without a clear assessment of the actual ecological consequences.

The Commission should refuse permission if significant ecological effects have not been adequately assessed or cannot be satisfactorily avoided or mitigated.

8. SURFACE WATER, DRAINAGE AND WATER QUALITY

The development will introduce areas of hardstanding, foundations, access infrastructure and other surfaces that may alter the existing drainage regime.

Excavation and construction activities may also result in soil erosion, sediment mobilisation and the release of pollutants unless appropriate measures are designed and implemented.

The Commission should require a site-specific assessment of existing drainage conditions, receiving waters, surface-water pathways, soil characteristics and the cumulative drainage implications of the wider solar farm and associated infrastructure.

The assessment should demonstrate how surface water will be managed throughout construction and operation, including during periods of heavy rainfall.

It should also establish that the proposed drainage measures will not transfer flood risk or drainage problems to neighbouring landowners, local roads, watercourses or downstream properties.

The applicant should demonstrate that appropriate pollution prevention measures, inspection procedures, maintenance arrangements and contingency measures will be in place.

The absence of a demonstrated, effective drainage solution would create an unacceptable risk to the receiving environment and to neighbouring properties.

9. NOISE, RESIDENTIAL AMENITY AND OPERATIONAL IMPACTS

The Commission must consider both temporary construction noise and the long-term noise generated by the proposed electrical infrastructure.

Potential sources may include transformers, cooling equipment, switching equipment and other associated plant, as well as construction machinery, deliveries and site activities.

The assessment should be based on representative background noise measurements, realistic operating scenarios and appropriate consideration of the characteristics of the equipment proposed.

Where tonal or other distinctive noise is possible, the assessment should contain sufficient technical information to evaluate its potential effect on nearby dwellings. Any reliance on noise modelling should be supported by transparent assumptions and suitable technical data.

The Commission should also examine construction working hours, lighting, security arrangements and the potential for disturbance to residents during construction and operation.

Conditions may be appropriate to control certain impacts, but they should not substitute for adequate evidence that the development is capable of operating without unacceptable effects on residential amenity.

10. NEED, ALTERNATIVES AND APPROPRIATE SITING

The importance of renewable electricity infrastructure does not remove the obligation to assess whether a particular development is appropriately located and designed.

The Commission should examine the justification for the proposed substation and loop-in grid connection, the site selection process, the reasonable alternatives considered and the environmental consequences of those alternatives.

The applicant should demonstrate that the selected location represents an appropriate balance between grid requirements, technical feasibility, environmental protection, landscape impact, residential amenity and the avoidance of unnecessary damage to local infrastructure.

The assessment should address whether a different site, layout, infrastructure configuration or construction methodology could reduce the impacts identified in this objection.

The existence of a potential connection requirement does not, of itself, establish that every proposed location or design is acceptable in planning terms.

11. CONSTRUCTION MANAGEMENT AND ENFORCEABILITY OF MITIGATION

The Commission should carefully distinguish between measures that have been fully designed and assessed and measures that remain dependent on future agreement, further investigation or general undertakings by the developer.

Any mitigation relied upon to justify permission must be sufficiently specific, practical and enforceable.

In particular, the Commission should be satisfied that arrangements for construction traffic, road protection, drainage, noise, ecological protection, archaeological supervision and reinstatement are capable of being implemented effectively and monitored throughout the project.

Where public roads are at risk of damage, the arrangements should include an appropriate baseline condition survey, clearly defined responsibilities, inspection procedures and effective reinstatement obligations.

The local community should not be left to bear the cost or inconvenience of resolving problems after construction has commenced.

12. ADEQUACY OF ENVIRONMENTAL ASSESSMENT

Before granting permission, the Commission must be satisfied that it has sufficient reliable information to assess the likely significant effects of the development and its interaction with the wider Greenhills Solar Farm project.

This requires consideration of the relevant environmental impact assessment documentation, appropriate assessment where required, cumulative effects, alternatives, mitigation measures and any material deficiencies in the information submitted.

The Commission should not rely on assumptions that impacts will be acceptable where the relevant baseline information, technical assessment or mitigation details are incomplete.

In particular, any uncertainty regarding archaeological constraints, ecological impacts, construction traffic, road capacity, drainage or cumulative effects must be addressed to the extent necessary to permit a lawful and properly informed decision.

Where significant information is missing, or where the environmental consequences cannot be reliably assessed, permission should not be granted on the basis of speculative or unverified assurances.

13. REQUEST TO AN COIMISIÚN PLEANÁLA

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

1. **Refuse permission** for the proposed development on the grounds that its environmental acceptability has not been demonstrated, insofar as the concerns identified above remain unresolved.
2. Ensure that the substation and grid connection are assessed in conjunction with the wider Greenhills Solar Farm and all relevant cumulative developments.
3. Require a satisfactory assessment of the capacity, condition and safety of the L7828, L7829 and L38032, including the cumulative burden of heavy construction traffic.
4. Ensure that archaeological heritage, biodiversity, landscape character, residential amenity and water management are fully and adequately assessed.
5. Examine the necessity, siting and design of the infrastructure and the reasonable alternatives available.

6. Decline to rely on mitigation measures that are insufficiently specified, unenforceable or incapable of resolving the identified impacts.

14. CONCLUSION

This objection is not based on a rejection of renewable energy infrastructure in principle. It is based on the requirement that development of this scale must be properly justified, appropriately located and supported by a complete and rigorous assessment of its environmental and community impacts.

The proposed 220kV substation and loop-in grid connection must be considered in the context of the wider Greenhills Solar Farm, the existing rural landscape, the surrounding archaeological and ecological environment, the permitted Lyrenacarriga Wind Farm and the limitations of the local road network.

The cumulative burden on the area, particularly where local roads are already damaged and unsuitable for substantial additional heavy goods vehicle movements without proper assessment, is a serious concern that must not be dismissed or deferred.

The Commission should be satisfied that the applicant has demonstrated, rather than merely asserted, that the development can proceed without unacceptable harm to the environment, local infrastructure and residential amenity.

In the absence of that demonstration, the appropriate planning decision is to refuse permission.

I respectfully request that this objection be given full consideration in the determination of case VA04.324632.

Yours faithfully,

Yours faithfully,

Teresa Murphy