Una Fitzgerald

Barnavidane

Inch

Killeagh

Co. Cork

02-11-2026

TO: The Secretary, An Coimisiun Pleanala, 64 Marlborough Street, Dublin 1

RE: OBSERVATION ON STRATEGIC INFRASTRUCTURE DEVELOPMENT - CASE REFERENCE 324632

Applicant: Perigus Energy Ireland Midco Ltd

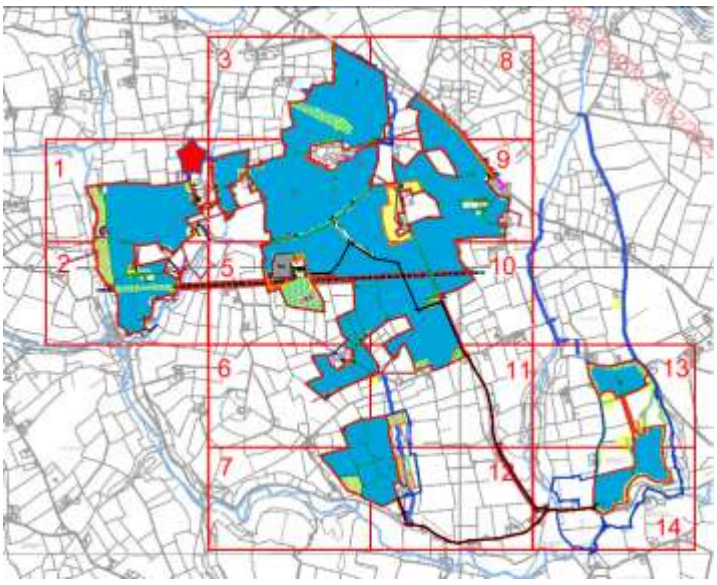
Proposed Development: 220kV Air Insulated Substation, loop-in grid connection and related works

Location: Ballyneague, Ballydaniel and Knocknagappagh, County Cork

A Chara,

I refer to the above planning application & wish to make the following objection in relation to the proposed development.

This planning application is very similar to both invalidated solar farm planning applications submitted by Orsted/Perigus Onshore Ireland Midco Ltd. in December 2025 (planning ref 25/6876) and again in September 2026 (26/2133). Orsted Onshore Ireland Midco Ltd. is now Perigus Energy Ireland Midco Ltd. It would seem that Perigus did not review the community's submissions either this time round as many of the same concerns still remain in our community. One could assume over 400 submissions from both previous planning applications were simply was cast aside and ignored. Is this listening to and engaging with the community for one of Irelands largest solar farms, BESS and substation?



The red star marks the location of my home. As you can see, the solar development is towards the East, South and West of our property. The Substation and BESS is South to my home.

I wish to object to the proposed development based on the points outlined below:

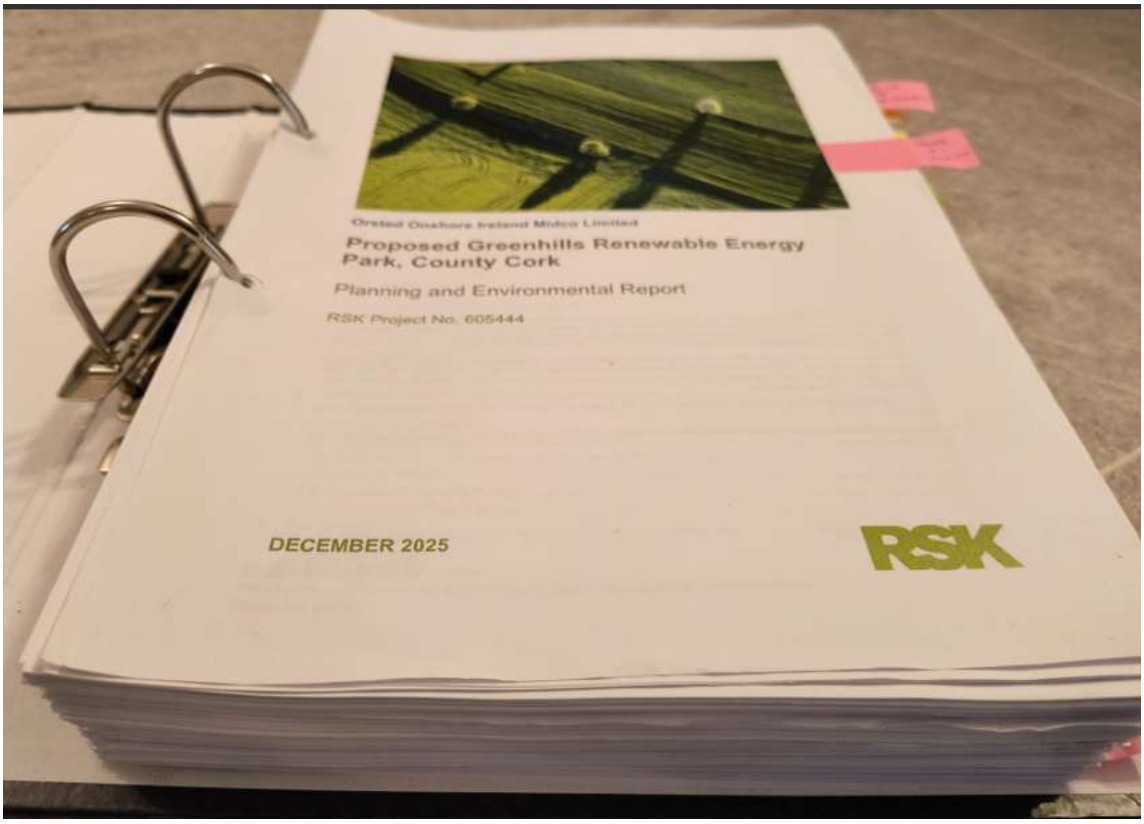
1. Quantity of files and supporting documentation

The volume of files and supporting documentation is excessive. The size and complexity of the submission makes it unreasonable to expect any lay person not only to read, but to fully understand the material provided.

This highlights the absence of meaningful public engagement. Public meetings or open exhibition events, with clear maps and visual aids on display, would have allowed residents in Inch to understand the implications for their own households and surroundings. Such an approach may have led to greater community acceptance of the proposal. The first time residents in Inch had a chance to view initial detailed maps was on the 19th of December 2025 when the planning application went into the council for their consideration by Orsted.

This is particularly concerning given that Orsted/Perigus has in their own words previously undertaken effective public engagement. For example, Orsted held public drop-in sessions for the East Irish Sea Transmission Project, where members of the public could attend without registration and discuss the proposals directly with the project team.

The lack of similar engagement for this development is therefore questionable.



Picture: The many documents that Orsted have on file in December 2025 in their first planning application.

2. Community Engagement

February 2025

The first leaflet drop took place on 26th February 2025. I was at home at the time of delivery and received a copy, yet some neighbours reported that leaflets were thrown into gardens or left on benches rather than being properly delivered, some received none at all which raises concerns about the quality of the consultation process.

During my conversation with the project representative, I showed him the rear of my house and asked about landscape screening. He stated candidly that effective screening would not be possible due to the scale of the site and elevations involved. I was told that photos could be taken from my property to show what the proposal would look like for my family and I. I followed this up with an email on 28th February 2025. See response below. I asked about the creation of local jobs and was told that a supplier engagement event would be held; however, there is no reference to this commitment within the submitted plans.

February 28th 2025 response from Orsted

- This refers to an email I sent to the community engagement lead in relation to a conversation on 26th February 2025. My question is in black and his answer is in red.

  You or a representative from Orsted will take photo montages from the back of our house to see the visuals impacts on our property? I will request this immediately.

This never happened.

July 2025

Leaflets were distributed to some residents on Thursday 31st July and Friday 1st August. I encountered a representative delivering leaflets on 31st July 2025. She stated that she was employed solely to distribute leaflets and had no knowledge of the project itself, advising residents to contact the names listed on the back of the leaflet.

It is important to note that this leaflet distribution occurred on the Thursday/Friday immediately preceding the August Bank Holiday weekend 2025, with consultation appointments scheduled for the following Tuesday (5th August) and Friday (8th August) during working hours.

August 2025

I attended the consultation event on 5th August. On that day, there were two neighbours ahead of me and one neighbour after me before Orsted representatives left. In total, only four members of the local community were met in the community hall that day.

Given this, I find it difficult to reconcile my experience with Orsted's documentation, which states that 36 face-to-face meetings took place over the two-day period. Based on the limited attendance observed, the implication that the remaining 32 meetings occurred between 10am and 5pm on the Friday appears highly implausible.

During the meeting, I specifically raised the issue of setbacks from the bottom of my field**,** an area identified as a potential future site for one of my four children**.** This concern was noted at the time on paper, and I was informed that I would be contacted with further information.

This never happened

I am also concerned about how Orsted defines and records "points of contact." It is unclear how the accuracy of 277 direct consultations can be verified when a "point of contact" appears to include brief interactions, such as meeting someone at a gate and saying thank you. As such, the figures presented do not clearly demonstrate how many unique members of the local community actually engaged in meaningful consultation.

September 2025

I would like to go into depth with a paragraph that Orsted have included on page 5 of their Summary of Engagement for September.

"*A member of the team was interviewed on September 11th by John Phillips for the Drivetime Current Affairs show on Community Radio Youghal, to be aired later on in the month. The interview was in response to a similar one conducted in August with three local objectors and sought to present a fair and balanced perspective of the proposal. Concerns voiced by the objectors included topics such as the perceived impact on agriculture and a claimed lack of community consultation. It is noted that these same objectors had lodged submissions in July and again at a later date, objecting to a local farmers retention application for some existing farm infrastructure. It is also noted that these three objectors had been met in person throughout the community consultation process outlined to this point, and unfortunately were interpreting a refusal to cease all planning for the proposed development as a lack of consultation. Other concerns included BESS fire risk, impacts from construction and the cost of energy. Reponses were provided where possible, with more detailed information to be available in the planning application pack once it is completed."*

Orsted's reference to three people objecting to sheds (**that were built without planning permission**) has no relevance to the planning merits of the of the current proposal for solar farm and BESS. Including this information appears designed to portray local residents as habitual or serial objectors (**the word objectors was used four times**) for raising legitimate planning concerns. One could assume wrongly that Orsted has no issue with building unauthorised developments by putting in irrelevant information like that. Orsted failed to mention that those sheds belong to Thomas, Simon and Elizabeth Browne who are significant landowners involved in the Greenhills Renewable Energy Project and who are leasing between 500-600 acres for this project plus supplying their own privately owned farm paths for the solar and substation access.

Orsted should clarify how portraying community members as serial objectors for raising valid planning issues aligns with its publicly stated values of fostering wellbeing, inclusion, and community support in renewable energy projects.

While Orsted do not say my name in this paragraph, it is easy to find out from the CRY interview conducted that I was on the radio voicing my concerns about the Greenhills Renewable Energy Project.

Orsted have failed to mention that CRY subsequently invited them to participate in a live debate with local residents but they were 'unavailable'.

I would like that this paragraph is removed from any of Perigus's future submissions related to this proposed development and an apology should be issued to the two other individuals singled out as objectors and I. At the time of the radio interview in August, I had not objected to any planning application submitted by Orsted/Perigus. My first submission regarding the Greenhills Project was not submitted until January 2026.

November 2025

I include an email that approximately 50 residents in Inch sent to Orsted around November 18th 2025.

18-11-2025

Orsted representatives,

We as a small rural community here in Inch request a FULL PUBLIC MEETING with representatives from Orsted prior to planning permission being sought for one of the largest solar farms in the country. This solar farm will affect future generations here in Inch. We deserve an open, honest and fair discussion with your company. We would ask that the landowners who have signed into this deal also attend this public meeting as Inch residents must live with the consequences of their decisions.

The one to one meetings in Inch Hall in August were held at times out of reach for most people who work 9 to 5 during the week with no weekend appointments available. One to one appointments in itself are daunting and detered people. Short notice of available appointments was common. A lack of brochures were distributed. Several local residents emailed looking for an appointment and got no reply. This all added an extra layer of disengagement for residents in Inch. We ask you to hold a public meeting during evening hours i.e. after 6pm.

Many Inch residents who did attend the one to one meetings gathered differing information from the Orsted representatives present or questions/queries asked of Orsted were not followed up. A public meeting would provide consistency in questions and answers and provide transparency and clarity to everyone affected in an open forum. We would all hear our neighbours concerns and everyone would hear the information supplied from Orsted representatives thus avoiding any confusion.

We have gathered close to 400 signatures from a local petition with signatures from local residents asking for a public meeting. This gives you a sense of how the local community is feeling in Inch with the level of community engagement offered so far.

Essentially, community engagement actively involves local communities in the planning, development and implementation of renewable energy initiatives. True community engagement involves more than distributing selected information or offering limited individual appointments. Ireland ratified the UN Aarhus Convention in 2012 which establishes clear principles for public participation in environmental decision making. These principles require that engagement be early, meaningful and genuinely consider community input. A recent IIEA ESB event provided a great example of community engagement in East Denmark which differs significantly from our local experience.

We respectfully ask that you reconsider your approach to community engagement here in Inch and urge you to hold a public meeting and provide adequate notice to residents to ensure transparency and meaningful community participation.

Yours sincerely,

The response from Orsted in late November 2025.

Thank you for your email inquiry.

Our community engagement efforts are intended to inform people in the locality about our intentions to apply for planning permission for a development and what that development proposal will consist of. Additionally, it is to provide contact information so that people can send any specific reasonable queries they may have in relation to the proposal, which we endeavour to answer to the best of our abilities. Sometimes, these queries can be premature, for example, residents may initially seek information showing a full layout of the development, which typically will not be available until closer to planning submission. As key information becomes available in a presentable format, we aim to share it with residents in the area surrounding the proposal in the form of a hand-delivered newsletter update. If you are resident within 1km of the proposed development, you should receive our third newsletter update in the coming weeks. Alternatively, this information can be found on our project webpage at https://orsted.ie/greenhills.

We are confident that the aims of our community consultation have been achieved: residents have been informed of the proposed development, and reasonable queries have received a response, either directly or within our newsletters, as appropriate. This has been done in a consistent, open, and honest manner. We held several appointment consultations at inch hall over a period of 8 week where we welcomed locals to come and meet us with queries. We accommodated out of hour meetings in people's home and continue to do so. This was a positive engagement, and people were given a chance to meet us and go through their concerns. Please note on this basis that we do not intend on hosting a public meeting. We continue to be available for specific queries via the contact information included in the newsletters and we look forward to helping you to understand the proposal and the benefits it can bring.

Should you have any other reasonable queries, please feel free to send them on and will be happy to respond to them accordingly.

Best Regards,

The Orsted Project Team

This email from local residents and Orsteds response does not feature in their Community Consultation Document.

In February/March 2026, Orsted sold its European onshore platforms to CIP including the Greenhills Renewable Energy Project. Orsted was rebranded as Perigus.

- **NO** information leaflets from Perigus have been distributed to the community in Inch.

- The previous email given by Orsted does not work*https://orsted.ie/greenhills* .

- No one knows who the community liaison officer is.

- Anecdotally, I am hearing from neighbours that they found Perigus's new website and sent emails which have gone unanswered.

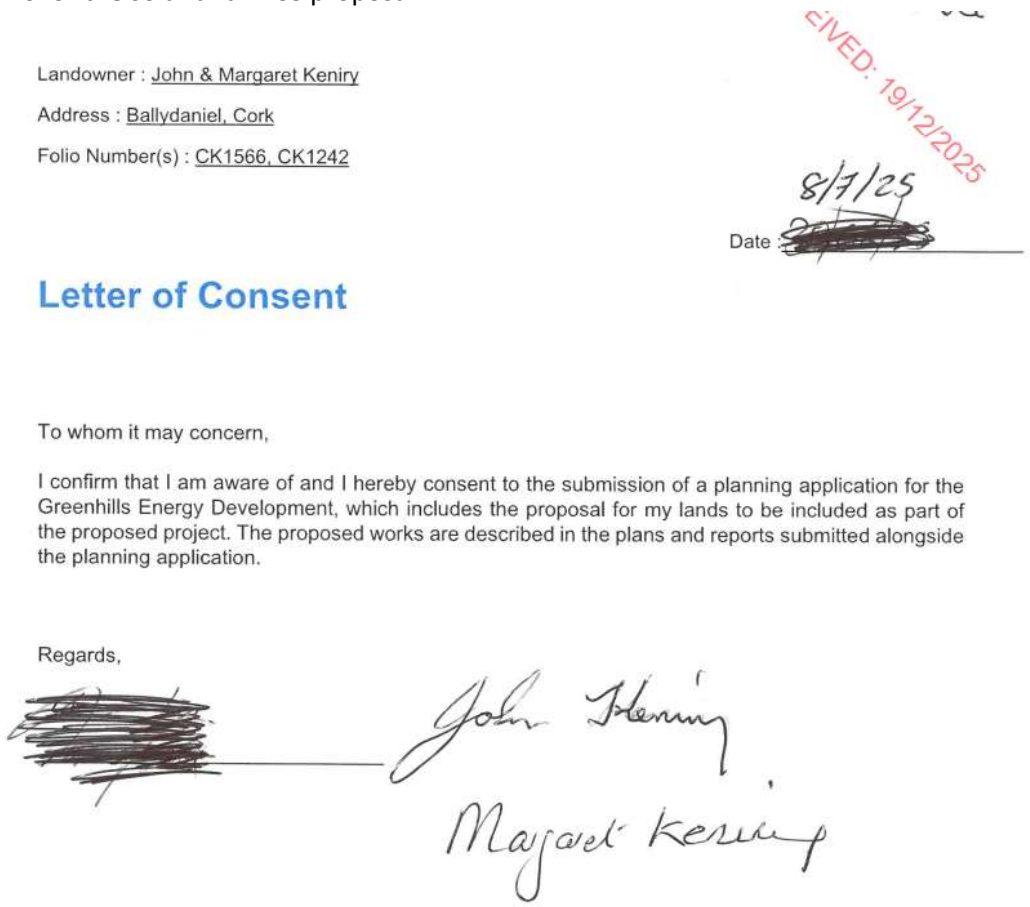
- Perigus have conducted NO community engagement since they have taken over Orsteds portfolio.

- **NO** Community Engagement has occurred as far as I'm aware since August 2025

All of this taken together demonstrates a fundamentally flawed consultation process that does not meet the standard of meaningful, fair, or inclusive community engagement—particularly for a development of this scale and impact in the Inch area.

3. Landowner consent:

1. Is scribbling allowed on presumed legal consent documents? While not applicable to the substation proposal, there is also scribbling, missing dates of consent and smudging on landowner consent forms for the solar and BESS proposal.



CEIVED: 19/12/2025

Landowner : John & Margaret Keniry

Address : Ballydaniel, Cork

Folio Number(s) : CK1566, CK1242

8/7/25

Date : [redacted]

Letter of Consent

To whom it may concern,

I confirm that I am aware of and I hereby consent to the submission of a planning application for the Greenhills Energy Development, which includes the proposal for my lands to be included as part of the proposed project. The proposed works are described in the plans and reports submitted alongside the planning application.

Regards,

[redacted] John Keniry

Margaret Keniry

I would like clarity on whether is it just folio numbers that need to correspond to the addresses on landowner consent forms. Simon Browne does not reside in Barnavidane, Ballyneague, Knocknagappagh or Ballydaniel. He lives in Ballyvergan near Youghal.
Likewise, John and Margaret Keniry do not reside in Ballydaniel but in Ballyhubbard near Youghal.

4. Site Notices

The 4 substation Notices were erected on 2nd September 2026, 2 on the R634 and 2 on the L7829.

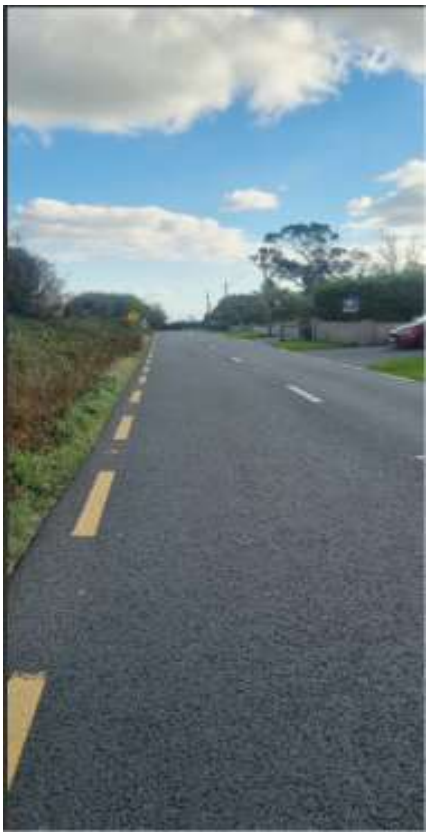
The initial notices included an objection closing date of 22nd October 2026 (see date on photo). See picture below of the planning substation notice on L7829 with closing date of October 22nd. Can ACP clarify why this date subsequently changed to the 3rd of November or the relevance of changing?



The Planning notices on the R634 are located that members of the public can not safely pull in their cars and view these notices. Speed limit on the R634 is 80kmph which has no safe pull in area/verges for a car. Included are pictures of the R634 road.



View of the R634 looking North



View of the R634 looking South





The Planning Notices on the R634. Main Youghal/Tallow Road

It is my understanding that ACP notices should have a yellow background if 2 planning applications occurring at the same time? Please clarify. See picture of the solar planning application (26/2133) subsequently invalidated and the Substation planning application (324632) both on display together on the L7829 in September 2026 at site entrance 8. Image from Perigus' site erection report for the solar farm (26/2133 CCC)



I believe these to be grounds for invalidation.

Regarding the 2 site notices on the L7829, 1 is affixed to an ESB Pole and the other to a gate post. We would like to highlight that anyone that tries to view either sign will be subjected to CCTV by landowners involved (Thomas, Elizabeth and Simon Browne). Are several core civil liberties and legal protections at risk including the right to data privacy, the right to public participation and the right to transparency and information by attempting to read planning notices without the risk of being recorded?



5. Photomontages

I showed the an Orsted representative the view from my back garden in February 2025 on the first leaflet drop and he agreed with me that any sort of mitigation will not screen the view from the back of my home. My family and I will potentially view hundreds and hundreds of acres of solar panelled land plus the permanency of the substation. There is no hiding this or escaping that fact.

Having viewed the photomontages included in this application taken at the points below, it is fairly evident that many of the photos were not taken for residents living in close proximity to this development including myself.



Taking a photo in Ardasallagh seems very irrelevant. Ardsallagh is no where near this development in Inch. Or VP24 of a housing estate in Youghal!



This is the proposed new View of solar panels from the back garden of my home.

Overall, I've found that many of the photomontages do not realistically represent the scale of this development.



This photomontage in Ballydaniel does not depict the substation. If the camera turns the opposite direction, this house and the 2 houses either side of it, will have a full view of the substation. So will the 3 houses across the road.



This photomontage from another house in Ballydaniel highlights the solar panels but does not depict the substation that is displayed in pink.



This photomontage is taken from the L7829 road. The substation is highlighted in pink but is not depicted in the montage. How can residents accurately assess these documents when the company does not have information clearly visible. There are multiple examples of this throughout Perigus photomontages: They highlight the solar farm and panels but not the substation on which this application is based upon.

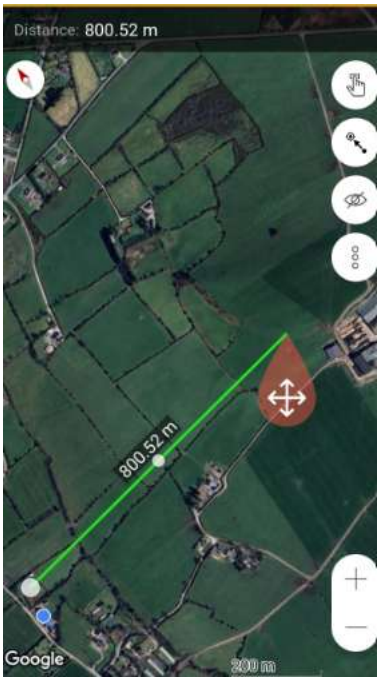


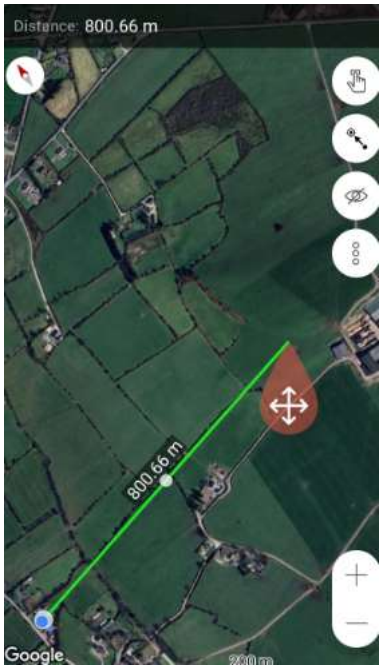
Residents in Meanoughter will be highly visually impacted if the solar, BESS development and the permanent substation is built yet were not considered in the photomontages. The orange area is the substation and BESS area and the blue some of the solar development. There are multiple homes in Meanoughter effected by the permanency of the substation.

6. **Glint and Glare Assessment**

I find it surprising and difficult to understand how the Macroworks Glint and Glare Assessment concludes that our immediate next-door neighbours (House 44 on the map) will experience a **medium glint and glare impact**, even with mitigation, while our home (House 45) will experience **no impact at all**, despite being approximately 39 metres apart and facing the same lands proposed for the Greenhills Solar Farm.

Page 23 of the Macroworks assessment identifies House 44 as experiencing medium glint and glare. Both houses are located approximately 800 metres from the residential receptors. Given the proximity, orientation, and shared views toward the proposed development, I am seeking clarification as to how House 44 will experience glint and glare while our home will not**.** This appears inconsistent and raises concerns regarding the accuracy of the assessment for both the solar farm and the substation.





My neighbours home is the white dot. House 44.

My home is the blue dot. House 45

If our home has been omitted accurately from the assessment, this also raises a wider concern as to how many other properties may have been excluded. An Coimiuin Pleanala inspectors should examine this assessment carefully to ensure it provides an accurate and complete representation of the impacts on local residents in Inch.

The Glint and Glare Assessment prepared for Orsted states that House 44 will experience glare for **up to 40 minutes per day, across 137 days per year**, while our property will experience none. Given that both houses face the same fields and lands proposed for the solar development, this conclusion undermines confidence in the assessment and its methodology.

The report further states that for House 44, *"once the proposed mitigation screen planting has fully established, these periods of potential reflectance will marginally reduce. Nonetheless, the magnitude of effect will remain medium."* This highlights further concerns, as Perigus cannot control third-party landowners who may remove trees or hedgerows at any stage, potentially rendering mitigation ineffective. In addition, any proposed hedgerow or screen planting would take many years to mature, leaving residents exposed to glint and glare in the interim.

It should also be noted that we already experience significant glint and glare from unauthorised sheds**,** which are now seeking retention, and this glare directly impacts our children while playing in our back garden in Barnavidane. This garden will also face the proposed solar farm and substation development further compounding the cumulative impact.



Picture: Our family already experiences glint and glare from shed roofs.

Given these factors, I cannot understand how the glint and glare assessment can reasonably conclude that our neighbours will experience significant impacts while our household will not. As currently presented, the report does not appear to provide a true or reliable reflection of the glint and glare impacts that residents in Inch may experience including my own family.

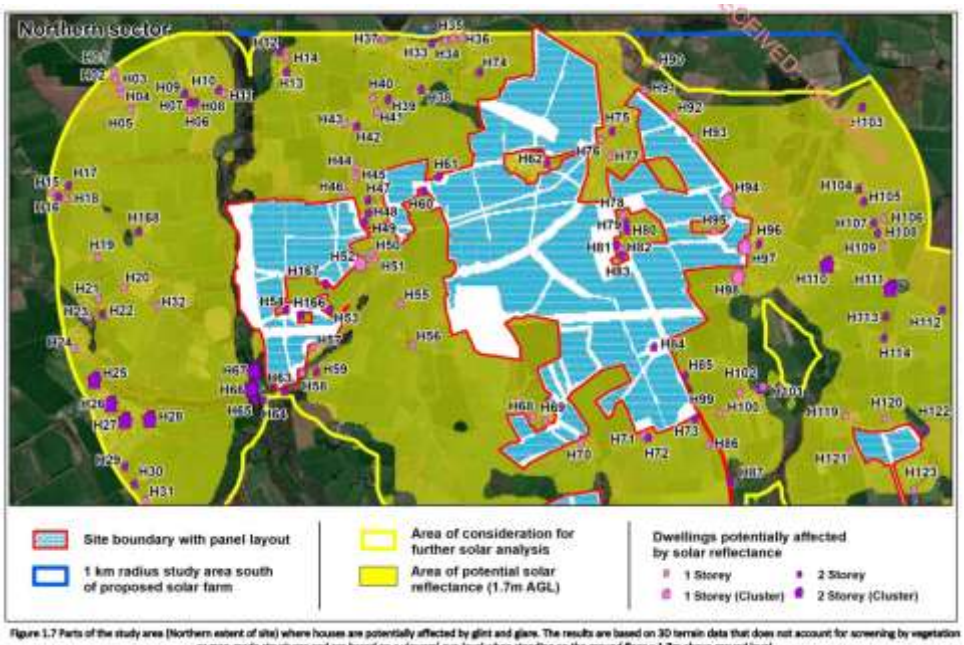


Figure 1.7 Parts of the study area (Northern extent of site) where houses are potentially affected by glint and glare. The results are based on 3D terrain data that does not account for screening by vegetation or man-made structures and are based on a viewers' eye-level when standing on the ground floor = 1.7m above ground level.

7. Road Traffic and Safety

While the road L3803 is not relevant to the substation application, it is included in Perigus Traffic Assessment for the development as a whole. My home is directly adjacent to the L3803. Regardless of what the traffic assessment states, this is already an extremely busy rural country road. As a family, we regularly walk, cycle, and use scooters along this road, and we must be constantly vigilant, particularly because we have young children.

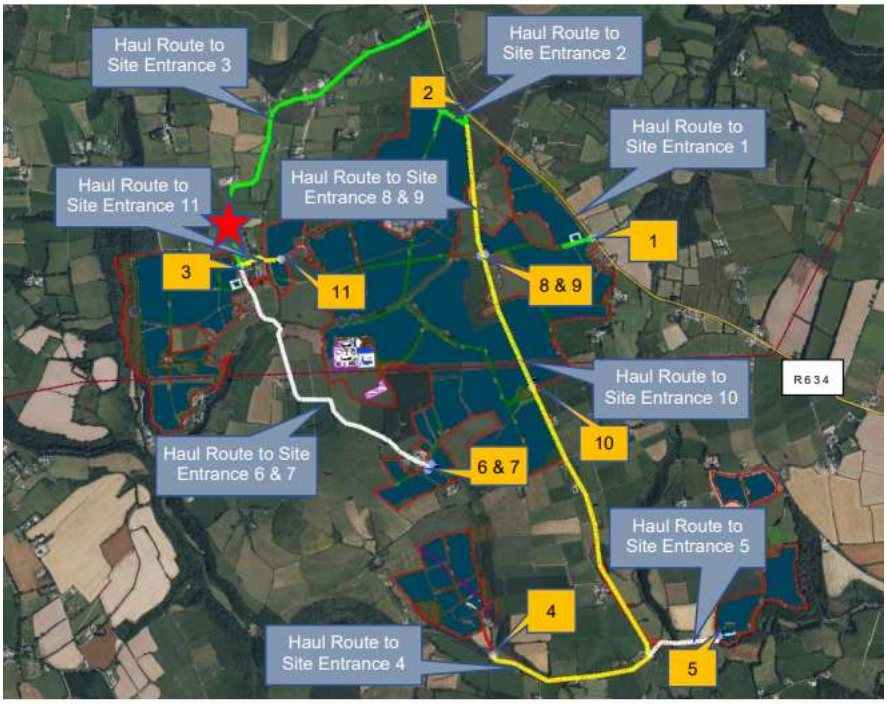


Figure 1.13: Construction Haul Routes

Picture: My home is adjacent to L3803 and is marked by a red star.

My eldest child is 12 years old. Living in a rural area, cycling is his only means of transport to meet friends. If this development proceeds, the increased traffic associated with it will make this activity significantly more dangerous and unacceptable from a safety perspective.

We live in extremely close proximity to Site Entrance 3, where up to 100 HGVs/LGVs per day are proposed, in addition to approximately 100 construction worker vehicles. This level of traffic raises serious safety concerns for my children, our extended family, neighbours, friends, the school bus driver, and the children who use this service, including my own.



The L3803: Bad road surfaces and HGVs using width of road.



L3803: No more room

The local road network contains numerous blind bends and, in several sections, cannot safely accommodate two-way traffic in its current state. The proposed passing bays are located on grass verges directly outside people's homes, and in some cases on land belonging to individuals not involved in this project, see plate 12. **All proposed passing bays** should be clearly identified and highlighted on the traffic assessment plans. The assessment also suggests that passing bays are unnecessary in certain locations; however, any competent road engineer familiar with Cork County Council standards would strongly disagree with this conclusion.



In addition, I am concerned that weather conditions specific to Inch have not been adequately considered in relation to road safety. The development area includes Knocknagappagh Hill, which is approximately 600 feet above sea level. Roads in this elevated location suffer from severe fog, particularly during the winter months, making driving conditions extremely hazardous. While local drivers are aware of these risks, construction traffic and other drivers unfamiliar with the area may not be.

The R634 has recently been fitted with new cat's eyes to mitigate fog-related hazards. In contrast, the L3803, which runs directly adjacent to our home, continues to experience significant fog issues. Given that this area can be foggy for two to three months of the year, I am surprised that Perigus considers this a suitable location for a solar development, as both road safety and solar capture/efficiency appear to be compromised.



Fog at site entrance 2



Fog in field for solar and also on L3803.

Contrary to what the traffic impact assessment says in relation to the extra volume on the roads, **there will be more** than a slight/negative and short term. Two years is a very long time in anyone's life but especially a child who has a right to travel, walk, cycle these roads without fear of being struck by extra traffic!!!!! Roads in Inch are not designed for this.

8. Inconsistency in Work Times

Traffic Impact Assessment

1.6.1 Construction Period and Working Hours The construction of the Proposed Development is programmed to be carried out over a 21-month construction period. The estimated timeframe is based on the construction of similar size solar farms. Working hours during the construction of the solar farm will be from 08:00 - 18:00 Monday to Friday and 08:00 – 16:00 on Saturdays with no working on Sundays or Bank Holidays.

Outline Construction Methodology

8.0 Construction Hours Standard working hours for construction will be 8.00am to 8.00pm Monday to Friday and 8.00am to 6.00pm on Saturday (if required), with no works on Sundays or Bank Holidays except in exceptional circumstances.

Perigus, can you explain which of these reports is actually correct? The documents appear to be an uncoordinated collection of inputs, seemingly produced without review. Fundamental details — including start and finish times and whether work is planned on Sundays or Bank Holidays — remain unknown, raising serious concerns about competence and planning.

9. Rath Fort and Tourism Potential



The Archaeological, Architectural and Cultural Heritage Baseline Report submitted with this application contains significant logical, evidential and procedural weaknesses that fail to meet the standards required under the Planning and Development Act 2000 and the Framework and Principles for the Protection of the Archaeological Heritage (Department of Arts, Heritage, Gaeltacht and the Islands, 1999).

The submitted documentation stipulates that all archaeological works are to be undertaken by suitably qualified personnel engaged by the developer. Critically, there is no provision for independent verification of findings, no requirement for the Cork County Council archaeologist to attend specific trigger-stage events, and no third-party audit mechanism incorporated into the monitoring program. For a site of this magnitude and complexity, spanning over 800 acres with a construction period extending nearly two years, relying exclusively on developer-appointed monitoring without any independent oversight creates a structural accountability gap that is fundamentally incompatible with proper heritage protection.

The National Monuments Acts 1930-2014 place a statutory obligation on both developers and planning authorities to protect archaeological heritage. The current proposal effectively privatizes all archaeological monitoring and decision-making, placing it entirely within the control of the applicant. This arrangement contravenes the principle of independent oversight that is fundamental to heritage protection under Irish law.

Within a 5km radius of the proposed development site, there are more than fifteen recorded monuments including CO056-004 (Lime kiln), CO056-002 (Ringfort-rath), WA037-009 (Earthwork), CO067-001003 (Souterrain), and CO056-001001 (Ancient graveyard). The National Planning Framework identifies archaeological sites as critical objection grounds for major developments. The proximity and density of recorded monuments in this area indicates high archaeological potential across the development site.

Of particular concern is the Rath Fort located within the affected landscape, which represents a site of considerable heritage value and offers protected panoramic views of historical significance. The proposed development would fundamentally alter the setting and context of this monument.

Rath fort should not be assessed as an isolated archaeological feature. It forms part of a wider historic landscape representing successive phases of settlement and land use. Its significance therefore extends beyond the surviving monument to its relationship with the surrounding topography, fields, routes and other archaeological sites.
The acceptance of large-scale solar farm within this setting establishes a precedent whereby individual developments are considered acceptable in isolation while the cumulative erosion of the historic landscape is overlooked. Rath fort is our Newgrange.

Newgrange is protected because its significance cannot be separated from its landscape setting. The same principle should apply proportionately to lesser known archaeological monuments. International fame should not be the threshold at which landscape context becomes worthy of protection.

10.CEMP Report

It is difficult to have confidence in this documentation when inaccuracies continue to appear, as they have in previous documents. For example, the CEMP report refers to the solar development as a "wind farm" on at least one occasion, which suggests that the report may have been copied and pasted from another project. This misleads the public.

Additionally, based on discussions with several friends who work in construction, the stated quantity of approximately 357 lorry loads of concrete (2,850 m^3) seems very low for the combined requirements of fencing post foundations, plinths for the BESS, substation foundations, inverters, and transformers etc. Can this figure be confirmed as accurate? Further clarification would be appreciated.

The documentation states that spoil storage areas were selected to ensure slopes of less than 5 degrees; however, I cannot find any map identifying the location of the spoil pit.

11. BESS

There are 342 households in a 1.5km radius and 2 local schools in very close proximity to the proposed Substation, pylons and battery storage.

A house in Barnavidane recently went on fire. This house formed part of Perigus archaeological study. The Youghal fire brigade spent hours extinguishing this and made numerous trips to Inch for water. The location of the substation and BESS in Ballyneague means that the fire brigade will enter the site from the Youghal/Tallow road at site entrance 1 on the R634. This means that if they need to obtain more water in Inch village, this will be at least a 15 minute road trip one way. I've been told anecdotally that the fire brigades position on chemical and electrical fires is to let them burn. My issue with this is that these fires will send toxic smoke into the air and an evacuation will be ordered. Who orders this? How will they let people in the surrounding area know? Who is responsible?? The answer is unknown. The emergency response section in Perigus documentation speaks a lot about staff safety but not of the residents in Inch should a substation or a BESS fire occur.

A Major Lithium-ion Battery fire in Xerotech in Clare Galway in January in 2025 led to the evacuation of local schools (1,700 students), homes and businesses which stayed in place for numerous days after. 5 firefighters were taken to hospital due to lithium-ion contamination and some of those firefighters are still out of work months later. This is well documented.

I have major concerns over safety protocols required to manage Substation and BESS fires.

-**If** this can even be quenched, thousands of gallons of water will wash all chemicals into the environment and potentially water supplies (River Tourig), into the River Blackwater and private owned wells. What will happen to local pollinators, birds, wildlife, plants, our farm animals etc if this happens? To farmers crops, grass that feeds animals?

- In the event that the fire cannot be quenched an evacuation of nearby homes and schools will be required due to the toxicity of the fumes emitted, where are we to go if this happens? How do we get the elderly and livestock out quickly? Will parents have time to collect their children from Inch and Park school?

- The proposed location is adjacent to a wooded area which will only lead to the fire taking off more quickly.

- Who is going to pay for the clean up? Landowners signed up, Perigus, Cork Co Co? Xerotech has gone into liquidation since this fire. Estimates are between 20-80 million for Lithium-ion Battery fires clean ups alone. The previous applicants, Orsted, have previously been bailed out by the Danish Government and their share prices collapsed so can we rely on any company over the course of the next 40 years to still be in business if such a fire happened?

- The gases released during thermal runaway are often odourless and colourless and will pose a health risk to individuals living in our area. While most public concerns focus on flames and explosions, it's the gases that frequently injure first responders and bystanders or prompt widespread evacuations. Toxins such as hydrogen fluoride, carbon monoxide, and hydrocarbons like methane and ethane could pose severe respiratory dangers to people in Inch.

- **To access the Substation and BESS area, Fire trucks will enter from site access 1 off the R634, travel approximately 1 mile of farm paths, where internal access gates will need to be opened in a timely fashion. This adds extra response time. Is this the best and safest approach?**

Inch CURRENTLY HAS NO FIRE RISK FROM SUBSTATION AND BESS FIRES, lets keep it that way!

12. Wildlife (NIS)

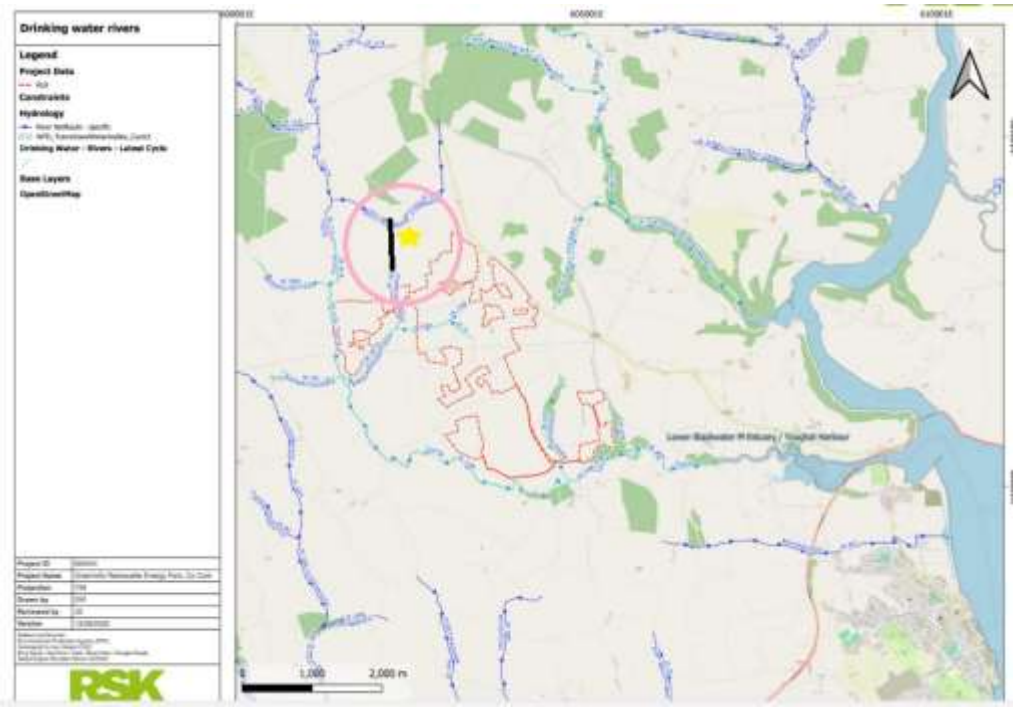
The ecological assessment submitted in support of the proposed development appears to rely predominantly on desk-based studies and limited site walkover surveys. It is not demonstrated that comprehensive field surveys were undertaken across the entirety of the approximately 800-acre site. The documentation does not include multiple surveys for key protected species, nor does it provide year-round ecological survey data. Furthermore, the assessment relies on datasets of varying age, some of which may no longer accurately reflect current site conditions.

The assessment places substantial reliance on proposed future mitigation and management measures in the absence of sufficient, up-to-date baseline ecological evidence. In this regard, it is considered that the information provided does not meet the requisite standard of scientific certainty required under the Habitats Directive.

I wish to focus on one protected species, the otter. The NIS and AA screening surveys recorded evidence of otter activity on both 19 and 21 August 2025. This is further supported by a local resident in Inch village, who can attest to the presence of otters in the River Tourig. A second local resident has also reported an otter sighting in the Carriganass River during summer 2026, at the location marked by the yellow star.

My concern relates to Appendix N (Lands, Soils and Hydrology). The RSK mapping appears to show the Carriganass River terminating before its confluence with the Ballycondon Commons River. However, as indicated by the black line on my annotated map, these two watercourses do in fact connect.

The recorded and reported otter sightings in the River Tourig at Inch village and near the Vee (yellow star) suggest potential movement along this connected river network. This raises an important question: have otters potentially travelled along the river network towards the Knocknagappagh River and the fields surrounding the proposed substation site?



Having regard to the scale and nature of the proposed development, it is submitted that **a full Environmental Impact Assessment is required**. The proposed solar farm would represent a development of an unprecedented scale within Co. Cork and indeed Ireland, and permission should not be granted in the absence of a comprehensive, rigorous, and fully independent Environmental Impact Assessment addressing all potential environmental effects.

13. Flooding and Surface Water

The Construction Environmental Management Plan (CEMP) states that the site has the potential to cause an increase in both the peak rate and volume of surface water run-off in the absence of mitigation measures. It proposes that drainage will be attenuated through the use of check dams to reduce peak run-off and promote infiltration, and concludes that the development will preserve existing greenfield run-off rates and volumes.

However, the CEMP does not reference or include a baseline study that quantifies existing greenfield run-off rates for the site. I have been unable to locate any such assessment within the submitted documentation. Without a clearly defined baseline, it is not possible to verify the claim that greenfield run-off rates and volumes will be maintained.

Furthermore, the report states that no mapped landslide events have occurred close to the study area. I dispute this conclusion and will submit photographic evidence demonstrating slope instability and ground movement in and around the site.

Developments of this nature inevitably lead to soil compaction, which can significantly reduce infiltration capacity. Decompaction can take many years, during which time surface water run-off may be increased. During this period, the effectiveness of the proposed mitigation measures is uncertain and cannot be relied upon to fully address the risk.

Local residents are well aware that the Inch area already experiences significant issues with surface water accumulation, field run-off and flooding, even in the absence of any development. It is expected that many submissions will highlight ongoing flooding problems in Inch and the surrounding areas. I also submit photographic evidence documenting historic and recent flooding and surface water events in Inch to support these concerns.

Mitigation without baseline data is meaningless!





I would classify this as a landslide which occurred during Storm Babet on L3808.

There has been numerous examples of landslides on that road throughout the years.








Storm Damage during Storm Babet in Inch and surrounds.




The Bridge heading towards Ballyneague from Barnavidane. This bridge collapsed during Storm Babet as seen by our neighbours car nearly entering the river Knocknagappagh. This river has a high water count with water entering the bridge from the Knocknagappagh river. Water from the substation fields converges here before entering the river Tourig.






Surface Water Issues L7829 at site entrance 8 and 9 before any development takes place.

14. Geophysical Survey

I understand CCC requested that a geophysical survey be undertaken for planning ref 26/2133 for the solar farm. However, the survey was not completed across the entire proposed development area, with approx. 100 acres excluded from the survey.

If the planning authority considers a geophysical survey necessary for a development of this nature, there is no obvious justification for proceeding with this proposal when a substantial portion of the proposed site has not been surveyed.

The missing 100 acres cannot simply be treated as though the survey findings from the remainder of the site automatically apply to it.

The purpose of requiring appropriate site investigation is to establish what is actually present on the land. Until the outstanding area has been properly investigated, there remains uncertainty regarding potential archaeological, geological or other features which could be relevant to the development.

This is particularly concerning because the stated conditions which prevented or restricted the survey earlier this year no longer appear to provide a justification for leaving work incomplete. I understand the survey could not be completed in April/May 2026 due to ground conditions. However, the crops have now been cut and access to land is more practical.

If the ground conditions in April/May 2026 were considered unsuitable for a geophysical survey, which is essentially, a survey carried out using a quad, it is difficult to understand how the same ground can now be regarded as sufficiently suitable for the construction and operation of an 800 acre solar farm or for the building of a 220kv substation.

This apparent inconsistency requires a proper explanation!

The remaining land must be surveyed before ACP can make a decision on this application.

15. Cumulative Effects – Greenhills Solar Farm, Lyrenacarriga Wind Farm and Associated Substation Infrastructure

An Coimisiún Pleanála needs to draw attention to an important cumulative-impact issue arising in respect of the proposed 220kV substation development under Planning Ref. 324632, particularly in the context of the existing and proposed energy infrastructure in the area.

Cork County Council previously identified the need for a proper cumulative assessment of the proposed 800-acre solar farm and the permitted Lyrenacarriga Wind Farm in its assessment of Planning Ref. 25/6876. The Council specifically requested that the Landscape and Visual Impact Assessment address the cumulative effects arising from the proximity of the two developments.

However, the subsequent planning submission under Planning Ref. 26/2133 did not, adequately address the cumulative effects previously identified by Cork County Council. The absence of a meaningful cumulative assessment of the solar farm and Lyrenacarriga Wind Farm is particularly relevant when considering the current proposal for the 220kV substation under Planning Ref. 324632.

The cumulative assessment should not be considered in isolation from the wider pattern of energy infrastructure being developed in this area.

There are, or are proposed to be, two substantial substations approximately 4 km apart. An 110KV substation has already received planning permission (case reference: PA04.309121), while the current application seeks permission for a separate 220kV substation. The visual, landscape and construction impacts of the already-permitted 110kV substation and the proposed 220kV substation therefore need to be considered cumulatively, together with the wider solar and wind energy developments that they serve.

It is also important that the 220kV substation has not been properly taken into consideration in the cumulative assessment associated with Planning Ref. 26/2133. The fact that the 220kV substation is being considered under a separate planning application should not mean that its potential cumulative effects can be disregarded when assessing the wider development of this energy-infrastructure cluster.

There is an additional cumulative issue arising from the proposed substation construction arrangements.

The construction traffic associated with the two substations is proposed to utilise the R634. Consequently, the construction impacts of the separate substation developments cannot reasonably be considered entirely independently.

The use of the same road for construction traffic creates the potential for cumulative impacts arising from:

- increased construction traffic on the R634;
- heavy goods vehicles and abnormal loads associated with the construction of the substations;
- increased traffic movements over potentially overlapping construction periods;
- interaction between construction traffic associated with the two developments;
- impacts on road users and local residents; and
- cumulative noise, disturbance, dust and road-safety impacts arising from construction activity.

These matters warrant assessment irrespective of the fact that the two substations are being considered under separate planning applications.

In these circumstances, An Coimisiún Pleanála should consider the proposed 220kV substation in the context of the existing, permitted and proposed energy infrastructure within the surrounding area, rather than assessing it as an isolated development.

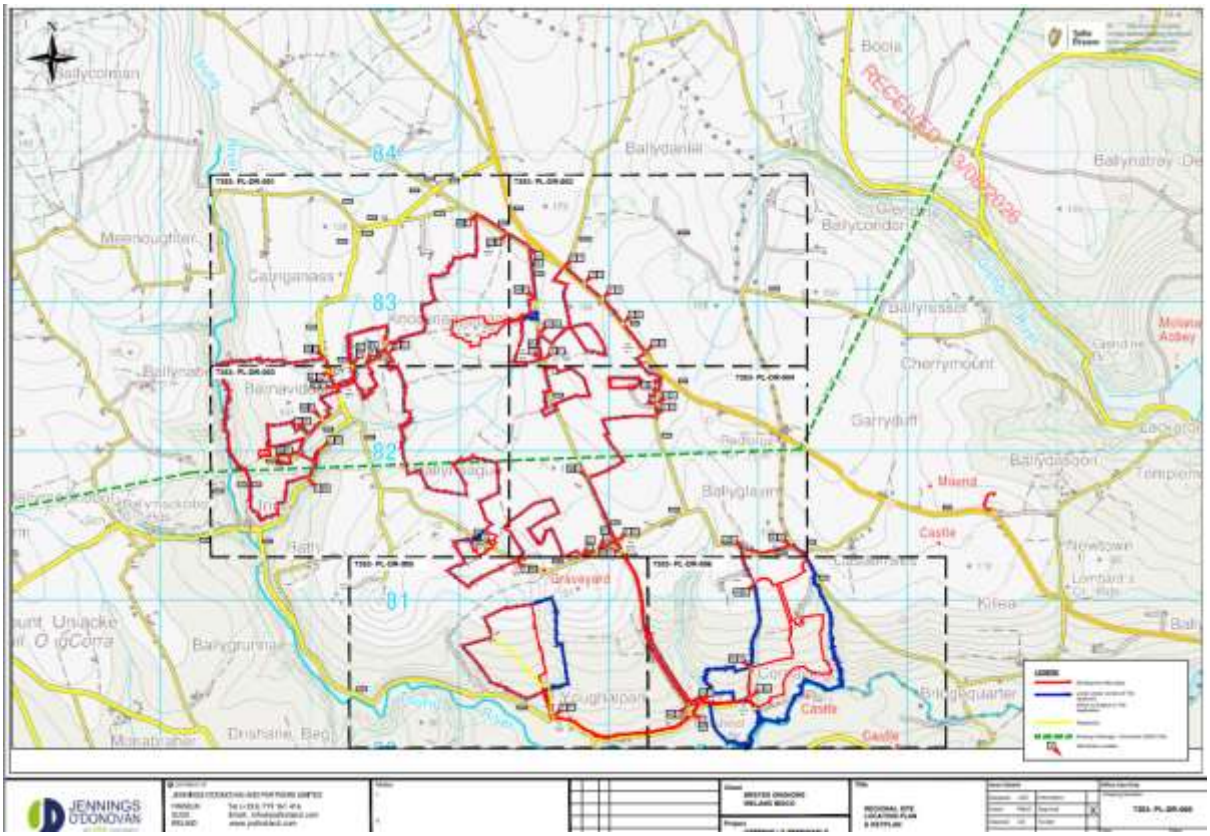
The cumulative assessment should, at a minimum, consider the interaction between:

1. the approximately 800-acre solar farm;
2. the permitted Lyrenacarriga Wind Farm;
3. the permitted 110kV substation;
4. the proposed 220kV substation under Planning Ref. 324632; and
5. the associated transmission and other energy infrastructure forming part of these developments.

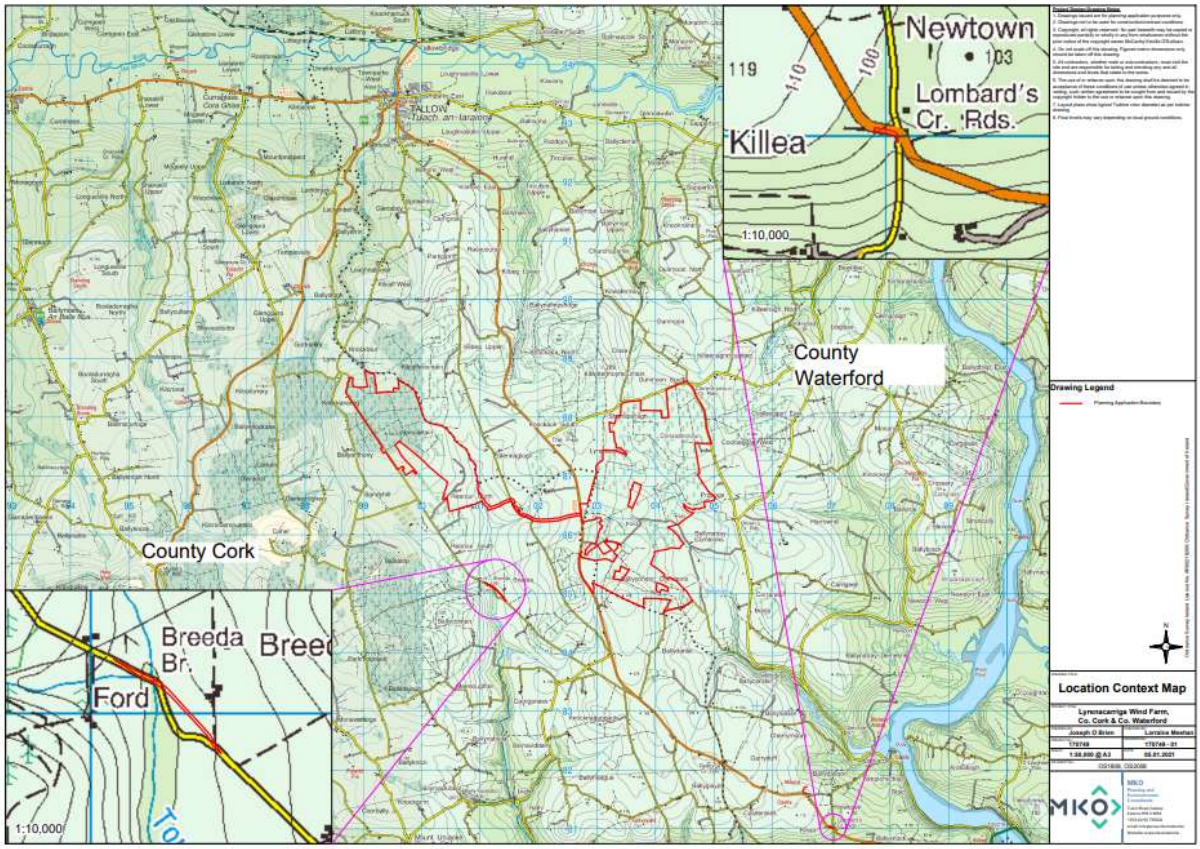
Particular consideration should be given to the fact that Cork County Council had already identified the need for a cumulative assessment of the solar farm and Lyrenacarriga Wind Farm under Planning Ref. 25/6876, yet the subsequent Planning Ref. 26/2133 did not adequately provide the requested assessment.

The cumulative effects should therefore be assessed both spatially and temporally, including the combined landscape and visual effects and the cumulative construction impacts where construction activities and traffic movements overlap.

The fact that the developments are subject to separate planning applications does not remove the potential for them to be experienced as a single or interconnected concentration of energy infrastructure within the receiving landscape.



The proposed 800 acre solar farm, BESS, 220kv substation and associated works.



The Lyrenacarriga 17 wind turbine farm, 110kv substation, BESS and associated works.

Conclusion

On the basis of the above, I trust my concerns will be taken into consideration prior to a decision being reached on this planning application. I respectfully request that An Coimisiun Pleanala **REFUSE** granting this planning permission.

Mise le Meas,

Una Fitzgerald