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20th October 2026

The Secretary
An Coimisiun Pleanala
64 Marlborough Street
Dublin 1
D01 V902

RE: OBSERVATION ON STRATEGIC INFRASTRUCTURE DEVELOPMENT – CASE REFERENCE VA04.324632
Applicant: Perigus Energy Ireland Midco Ltd.
Proposed Development: 220kV Air Insulated Substation, loop-in grid connection and related works.
Location: Ballyneague, Ballydaniel ans Knocknagappagh, County Cork

Dear Sir/Madam,

I wish to formally object to the proposed 220kV substation development in the townlands of Ballyneague, Ballydaniel, Knocknagappagg, County Cork under planning reference number 324632.

While I acknowledge the importance of developing electricity infrastructure to support Ireland's renewable energy and climate objectives, I have serious concerns regarding the suitability of this location and the potential impacts on the local community.

1. Inappropriate Location Near Educational Facilities
The proposed substation is in close proximity to Park National School and the wider school community. While electrical infrastructure is essential, developments of this scale and industrial nature should be situated where impacts on educational facilities, children, parents and staff are minimised as far as possible.
The planning authority should carefully consider whether the siting of a major transmission infrastructure project close to a school represents the most appropriate use of this location.

2. Unsuitable Rural Road Networks
Building a substation requires moving incredibly heavy components, such as multi ton electrical transformers via heavy goods vehicles (HGV's).
Narrow, single track, country lanes are entirely unsuitable fort his scale of traffic, creating roads safety hazards, structural degradation to road edges and protracted congestion for the local population.
Construction of a major electrical installation will require the transportation of large transformers, construction materials and heavy plant equipment.

Local roads around the proposed site are also used by school traffic, agricultural vehicles, pedestrians and cyclists. The planning authority should carefully assess whether the existing road network can safely accommodate these additional construction traffic movements and whether mitigation measures are adequate.

3. Regulatory Uncertainty and Precautionary Approach

While electrical substations are subject to planning and environmental regulation in Ireland, I am concerned that there is no specific national setback policy or minimum separation distance requirement governing the location of 220kV air-insulated substations in proximity to schools, childcare facilities or residential communities.

In the absence of such clear national guidance, I respectfully request that An Coimisiún Pleanála apply the precautionary principle and carefully consider whether the proposed location is appropriate given its proximity to Park National School and nearby residential properties.

I believe the applicant should demonstrate not only compliance with existing regulations, but also why this location represents the option with the least impact on the local community. Special consideration should be given to the long-term amenity, wellbeing and confidence of parents, pupils, school staff and residents.

Where uncertainty exists regarding the cumulative effects of large-scale electrical infrastructure situated near educational facilities, a cautious approach should be adopted, and alternative locations should be fully assessed before permission is granted.

4. Industrialisation of a Rural Landscape

The proposed development consists of a 220kV Air Insulated Substation connecting to the existing Knockraha-Cullenagh 220kV overhead transmission line. Such infrastructure typically includes transformers, gantries, lightning protection structures, security fencing, CCTV, internal access roads and extensive electrical equipment.

The visual effect of this infrastructure would introduce a substantial industrial feature into an otherwise rural landscape and could negatively affect the character and amenity of the area.

5. Noise Impact

Operational substations can generate continuous background noise from transformers, cooling systems and associated electrical equipment. Construction activities may also create significant temporary noise impacts.

Given the presence of nearby residences and Park National School, I believe a detailed and independently verified noise assessment should be required, together with robust mitigation measures where necessary.

6. Hydrology, Run off and Flooding risks

I am concerned about the potential hydrological and flood-risk impacts of the proposed 220kV air-insulated substation due to its proximity to the River Tourig and associated watercourses. The development will involve significant construction works, hardstanding areas, access roads, foundations, drainage infrastructure and electrical equipment. Such works have the potential to alter natural drainage patterns, increase surface water runoff and affect local hydrological conditions if not carefully designed and managed.

Given the increasing frequency of extreme rainfall events associated with climate change, it is essential that a robust Flood Risk Assessment and Hydrological Impact Assessment demonstrate

that the proposed development will not increase flood risk either on-site or downstream. Particular attention should be given to the potential cumulative impact of the substation together with other associated infrastructure proposed within the wider development area.
I am also concerned about the potential for sediment runoff, accidental spillages of fuels, oils or other contaminants during construction and operation which could adversely impact the water quality and ecological value of the River Tourig. The applicant should clearly demonstrate how nearby watercourses will be protected throughout all phases of the development.
In accordance with the precautionary principle, An Coimisiún Pleanála should be fully satisfied that the proposed development will not adversely affect the hydrology of the area, increase flood risk, or negatively impact the water quality and ecological integrity of the River Tourig and connected aquatic habitats before any permission is granted

7. Archaeological Heritage and Impact on Fort Rath

I am concerned about the proximity of the proposed 220kV air-insulated substation to Fort Rath and the potential impact on the archaeological and cultural heritage of the area.
Ringforts (raths) are among Ireland's most important archaeological monuments and form a significant part of our historic landscape. Even where a recorded monument is not directly affected by construction works, large-scale infrastructure developments can impact its wider setting, views, landscape context and historical character.
The introduction of substantial industrial infrastructure, including transformers, gantries, security fencing, lighting and associated electrical equipment, has the potential to diminish the heritage value and visual setting of Fort Rath. Consideration should be given not only to direct archaeological impacts but also to indirect impacts on the cultural landscape within which the monument exists.
I respectfully request that An Coimisiún Pleanála satisfy itself that a comprehensive archaeological and cultural heritage assessment has been undertaken and that the proposal will not adversely affect the significance, setting or future preservation of Fort Rath. Should any uncertainty remain regarding the potential impacts on archaeological heritage, the precautionary principle should be applied.

8. Safety, Fire Risk and Emergency Preparedness

I have significant concerns regarding the safety implications of locating major electrical infrastructure in close proximity to a school and residential properties.
The planning documentation should clearly demonstrate how all foreseeable risks associated with high-voltage electrical infrastructure have been identified, assessed and mitigated.

Thermal Runaway and Fire Risks

Should battery energy storage systems form part of the wider development, additional concerns arise regarding thermal runaway events and associated fires. International experience has demonstrated that battery-related fires can be difficult to extinguish and may require specialist firefighting techniques.
The applicant should provide detailed information regarding prevention measures, monitoring systems, fire suppression systems and emergency response procedures.

Toxic Gas Releases

Battery fires and certain electrical equipment failures can result in the release of hazardous gases and combustion products.

Given the proximity to Park National School and local residences, a detailed assessment should demonstrate that any potential effects on public health have been comprehensively evaluated and mitigated.

Explosion Risks

Although infrequent, electrical faults, battery failures and equipment malfunctions can lead to fire or explosion events.

The consequences of such incidents should be fully assessed, particularly considering the proximity of the development to sensitive receptors including schoolchildren, staff and nearby residents.

Contaminated Water Runoff

In the event of a fire or emergency response incident, contaminated firefighting water, transformer oils or other pollutants may enter drainage channels and local watercourses.

Given the proximity of the River Tourig, the applicant should demonstrate that suitable containment systems are in place to prevent contamination of nearby waterways and groundwater resources.

Emergency Access and Emergency Response Limitations

I request evidence that the local fire service, including Youghal Fire Brigade, has been formally consulted regarding the proposed 220kV air-insulated substation and its associated infrastructure.

The applicant should demonstrate that the fire service has been provided with sufficient information to assess the potential risks associated with a high-voltage electrical installation of this scale, including transformer fires, electrical faults, equipment failures and any incidents requiring specialist emergency response procedures.

Confirmation should also be provided that the operational requirements of the fire service have been considered as part of the design and planning process, including emergency access arrangements, site layout, water supply availability, isolation procedures and incident management protocols.

Where specialist training, equipment, resources or mutual-aid arrangements may be required to respond safely and effectively to an incident involving high-voltage electrical infrastructure, I request confirmation that these requirements have been identified and appropriately planned for.

Evidence should also be provided that any recommendations arising from consultation with emergency services have been incorporated into the planning application.

In the absence of such information, I do not believe that An Coimisiún Pleanála can be fully satisfied that adequate emergency preparedness measures are in place to protect nearby residents, road users, school users, emergency responders and the surrounding environment.

9. Public Consultation and Community Engagement

I am concerned that there has been insufficient consultation and engagement with the local community regarding this proposed development.

Given the scale and long-term nature of the proposed 220kV air-insulated substation, together with its proximity to Park National School, nearby residences, the River Tourig and local heritage assets such as Fort Rath, it is essential that affected members of the public are provided with clear, accessible and comprehensive information regarding the project and its potential impacts.

Many residents remain unclear about the full extent of the development, the potential implications during both construction and operation, and the measures proposed to address

concerns relating to safety, traffic, noise, visual impact, environmental protection and emergency response.
While statutory consultation requirements may have been met, I respectfully submit that meaningful community engagement requires more than the minimum legal requirements. The level of public awareness and understanding of the project should be carefully considered, particularly where a development has the potential to affect a local school community and surrounding residential areas for decades to come.
I request that An Coimisiún Pleanála carefully examine the extent and effectiveness of the public consultation undertaken by the applicant and consider whether local residents, parents, school staff and other stakeholders have been given a genuine opportunity to understand the proposal and have their concerns properly addressed before any decision is made.
Furthermore, I believe that all records of community engagement, public information events, stakeholder consultations and responses to concerns raised by members of the public should be fully disclosed and carefully reviewed as part of the assessment of this application.

6. Cumulative Impact
The substation is associated with a wider renewable energy development in the area. The cumulative impacts of the substation associated electrical infrastructure, solar development, battery storage facilities and increased construction activity should be assessed together rather than in isolation.
I am concerned that the proposed 220kV air-insulated substation has not been adequately assessed in the context of the wider developments planned for the area. The substation should not be considered as a standalone project but as part of the broader renewable energy infrastructure proposed by Perigus Energy Ireland MidCo Ltd., including the associated solar farm and other grid connection infrastructure.
The cumulative impact of these developments could result in a substantial transformation of the local landscape, with combined effects on visual amenity, rural character, biodiversity, traffic levels, noise, water management, cultural heritage and community wellbeing.
Particular consideration should be given to the cumulative impacts on:

- Park National School and its surrounding environment.
- Local residents and adjoining landowners.
- The rural landscape known locally as Cronin's Bog.
- The hydrology of the area and the nearby River Tourig.
- The archaeological and cultural setting of Fort Rath.
- Local roads that may experience increased construction and operational traffic.
- Emergency services that may be required to respond to incidents associated with multiple pieces of energy infrastructure.

While each individual element of the wider development may be considered acceptable in isolation, the combined impact of multiple large-scale energy infrastructure projects could have a significantly greater effect on the local environment and community than any single component alone. For this reason, I respectfully request that An Coimisiún Pleanála undertake a thorough assessment of the cumulative impacts of the proposed substation in conjunction with all related and connected developments before reaching a decision.

Conclusion
The proposed development would have significant implications for the local community, including users of Park National School, nearby residents, the River Tourig, and the

archaeological setting of Fort Rath. I am also concerned about the impact on the rural landscape locally known as Cronin's Bog, an area that forms part of the character, identity and environmental setting of the local community.
Having regard to the concerns outlined in this submission relating to public safety, emergency preparedness, flood risk, hydrology, traffic, noise, visual impact, heritage, community consultation and site suitability, I do not believe that it has been adequately demonstrated that this is the most appropriate location for a major 220kV air-insulated substation.
For these reasons, I respectfully request that An Coimisiún Pleanála refuse permission for the proposed development. At a minimum, I request that further information be sought regarding flood risk, hydrology, emergency response capability, consultation with emergency services, impacts on the school community, alternative site assessment, cumulative impacts and the long-term effects on the rural landscape of Cronin's Bog before any decision is made.
I believe that insufficient evidence has been provided to demonstrate that the potential impacts of this development have been reduced to the lowest practicable level or that the benefits of the proposal outweigh its potential adverse effects on the local community and environment.

Yours faithfully,

Anna Jozefowicz