Ava Farrington

The Pike

Tallow

Co. Waterford

17th 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 and Knocknagappagh, County Cork

Dear Sir/Madam,

I am a resident living more than 5km from the proposed development, and I wish to make an Observation on this application. It concerns only the 220kV substation. I understand that the solar farm and battery storage are the subject of a separate application. However, the substation is permanent infrastructure and would remain in place even if the solar farm were decommissioned after 40 years. Its effects should be assessed on that basis.

Cumulative Assessment of an Energy Cluster

The substation cannot sensibly be assessed as an isolated project. It forms part of a cluster of energy infrastructure: the proposed solar farm of approximately 800 acres, the permitted Lyrenacarriga Wind Farm, the permitted 110kV substation (case reference PA04.309121), and this proposed 220kV substation. The two substations would be approximately 4km apart. Under the Environmental Impact Assessment and Habitats legislation, the effects of a project must be considered together with other existing and approved projects, and, for Appropriate Assessment, other plans and projects in combination. I respectfully submit that this requires the substation to be examined alongside the wider development it serves. Matters Already Raised by Cork County Council. In assessing Planning Ref. 25/6876, Cork County Council identified the need for a proper cumulative assessment of the solar farm and the Lyrenacarriga Wind Farm. It specifically asked that the Landscape and Visual Impact Assessment address the effects arising from their proximity. The later

submission under Planning Ref. 26/2133 did not adequately address this request. It also appears that the 220kV substation was not properly taken into account in the cumulative assessment for that application. The result is a gap between two separate assessments, each relying on the other. The fact that the substation is being considered under a separate application should not allow its cumulative effects to go unexamined.

Landscape and Visual Effects

Two substantial substations about 4km apart, together with a large solar array and a wind farm, risk creating a landscape dominated by electrical infrastructure. The Commission should require the combined landscape and visual effects to be assessed both spatially and over time. This should include views in which the substations are seen in sequence or together with the wind farm and solar development, and the effects during construction as well as operation.

Shared Construction Traffic Route

Construction traffic for both substations is proposed to use the R634 (Youghal-Tallow Road), and this application includes a new entrance from that road. The two construction programmes cannot reasonably be treated as independent. Potential cumulative impacts include increased traffic volumes, heavy goods vehicles and abnormal loads, overlapping construction periods, and interaction between the two sets of construction vehicles. They also include noise, dust and disturbance for local residents, and road safety risks for other road users. I ask that a combined traffic and construction management assessment be required, setting out how the programmes would be phased and what the peak combined movements would be.

Purpose of the Infrastructure and Accurate Public Information

Many people have been told that electricity is the problem. It is not clear to the public what options have been considered to meet energy needs other than building more generation and connection capacity. The application does not make clear whether this infrastructure would reduce household bills, or whether it would mainly serve commercial users such as data centres. I raise this because the public is entitled to accurate information on which to form a view. Constantly increasing electricity demand, and building infrastructure to meet it, encourages the belief that more can be used without consequence. That is not a sustainable approach. Each additional substation adds to the cumulative burden on this area. I ask the Commission to require the applicant to set out clearly the need for the development, the capacity it provides, which generation it connects, and who will benefit.

Food Security and Policy Coherence

The substation exists to enable the solar farm, and it is permanent. I am concerned that productive agricultural land is being considered for energy use at the same time as the public is being warned about food supply and emergency preparedness, and when Ireland already imports a very large share of its food. The Emergency Be Ready leaflets came out at the same time we are considering removing agricultural land from food production, hopefully planting food that can be eaten by human, not just feeding animals. Do government departments correspond with each other on policies and views?

A Personal Note

I spent a lifetime in education, and I believe that the world is small and already under heavy pressure. Everyone has a responsibility for the state of the environment that future generations will inherit. Those elected and appointed to protect the public interest must take that responsibility fully into account in decisions of this kind, if public confidence in the planning system is to be maintained.

Conclusion

For the reasons above, I respectfully ask An Coimisiun Pleanala to refuse permission for the proposed 220kV substation, as its cumulative effects with the permitted 110kV substation, the Lyrenacarriga Wind Farm and the proposed solar farm have not been adequately assessed. At a minimum, I ask the Commission to request further information from the applicant on the following:

- a comprehensive cumulative landscape, visual and environmental assessment covering all the developments named above

- a combined construction traffic assessment for the R634 covering both substations

- a clear statement of need, capacity and intended beneficiaries

- an assessment of the cumulative effect on agricultural land

Thank you for considering this Observation.

Is mise,

Ava Farrington