Bianca Hoeksema
Carriganassa Killeagh
Co. Cork

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 and Knocknagappagh, County Cork

Dear Sir/Madam,

I live between 1 and 5 km from the proposed site and wish to object to this application. This Observation concerns only the 220kV substation and loop-in. Because the station is to be permanent and handed to the network operator, it must be assessed on its own merits, even if the separate solar application is later decommissioned.

1. Cumulative Effect (my principal concern)

It is unfair to ask one area to carry the burden of this and other energy developments. In assessing Planning Ref. 25/6876, Cork County Council identified the need for a cumulative assessment of the solar farm and the permitted Lyrenacarriga Wind Farm. I understand the later submission under Ref. 26/2133 did not adequately provide it, and did not properly take this substation into account. A 110kV substation has already been permitted under PA04.309121, approximately 4 km away. Two substantial substations in one rural area, serving a solar farm and a wind farm, form a pattern of development that should be assessed together. Construction traffic for both is proposed to use the R634, so abnormal loads, HGV movements, noise, dust and road safety effects may overlap in time. The EIA Directive 2014/52/EU and Schedule 6 of the Planning and Development Regulations 2001, as amended, require effects to be considered together with other existing and approved projects. Separate applications should not allow those effects to go unassessed. I ask the Commission to require a combined spatial and temporal assessment of landscape, visual and construction effects, including the permitted 110kV substation, Lyrenacarriga Wind Farm and the solar farm.

2. Emergency Risk and Fire

I ask how the Youghal and Tallow fire services could manage a substation fire while keeping residents safe. Section 4.3 of the Planning and Environmental Report lists two transformers and a diesel generator and tank, and the site notice describes oil-filled transformers within bunded enclosures. Schedule 7 of the Regulations requires consideration of the risk of major accidents and disasters. However, section 3.7.8 of the EIA Screening Report deals with concrete, hydrocarbon spills from construction plant and construction accidents, and Table 4.1 rates the risk "Low - design to mitigate". Neither assesses a fire at the transformers or the diesel tank. The oil volume is not stated. Drawing 300101185-DR-200 shows a

full-retention separator and soakaways on the surface-water system, and notes bunds "to be fitted with TBC at Detailed Design". It does not show that oil and firefighting water would be retained rather than passed towards a soakaway. The application also lacks a fire-appliance swept path from Site Access No. 1 on the R634 along the route shown on Drawing 300101185-DR-100B, a stated gate width, or a turning assessment. These matters should be demonstrated now, not deferred.

3. Site Location and Alternatives

I do not understand why a beautiful green area is proposed, when an already built-up or more urban location might be suitable. I also object to the permanent loss of food-producing agricultural land. The EIA Directive and Schedule 6 require a description of the reasonable alternatives studied and the main reasons for the choice, and the EPA guidelines on EIAR (2022) expect genuine comparison. The documents do not appear to contain a comparison of alternative sites along the 220kV route, and the selection appears to rest on landowner availability. The suitability of the local road network for heavy loads and emergency vehicles in wet conditions has also not been convincingly shown.

4. Visual Impact

I came to Ireland five years ago and have been struck by the beauty of this county. The LVIA, which uses GLVIA3 and 24 viewpoints, accepts that residential receptors are highly sensitive and notes at page 28 that several dwellings surround the substation. Yet its discussion at VP4 and VP5, both linked to dwellings, concentrates on solar panels, hedgerows and screening rather than the substation. The substation includes a 438 m2 control building, a 590 m2 IPP building, transformers, 2.6 m fencing, lighting and lightning masts of about 18 m. Reasoning that screens 3.4 m panels cannot be transferred to masts of that height. Reliance on planting with a three-year establishment period, without winter and long-term visualisations or ZTV analysis from the nearest houses, is inadequate. A dedicated residential visual assessment is needed.

5. Hydrology and Flooding

Last year our house was almost flooded and most of our garden was under water. I am seriously concerned that this development will make matters worse. Appendix N states that the site is not in a mapped flood zone, but accepts that the Tourig_020 and Glendine_010 watercourses have mapped indicative flooding, and that local knowledge indicates flooding within the same sub-basin. Its Flood Risk Assessment calculates a net runoff increase in a 1-in-100-year event of approximately 0.016-0.185 m3/s, up to about 4.15% of the micro-catchment. It describes the effect on land as "moderate, adverse and permanent", with excavation of up to about 3.6 m and roughly 9,320 m3 of imported stone. Absence of mapping beneath the site does not mean absence of risk. I ask that the Commission require evidence, including winter-condition investigation, that downstream homes will not be put at risk.

6. Construction Traffic, Residential Amenity and Wildlife

Very significant construction traffic over a prolonged period would have a negative effect on my family and our daily lives. I am also concerned about the impact on the value of my home. A significant bat colony was living in my roof until very recently. Bats are strictly protected under the Habitats Directive and the Wildlife Acts. I ask that up-to-date bat surveys be required, covering roosts, foraging and commuting routes, with assessment of the effects of lighting, hedgerow loss and construction disturbance on bats and other wildlife.

Conclusion

For these reasons I respectfully ask the Commission to refuse permission. At a minimum, I ask that it request further information on cumulative effects, fire and emergency management, alternatives, residential visual impact, flood risk and ecology before any decision.

Thank you for considering this Observation.

Is mise,

Bianca Hoeksema