Carmel Walsh
Monabraher Killeagh

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 live between 1 and 5 km from the proposed site and make this Observation on the substation application only. The solar farm and battery storage are a separate application. The substation is to be permanent and will remain if the solar farm is decommissioned, so it must be assessed on its own merits.

I. VISUAL IMPACT

My home has a direct line of sight to the site, and the substation will break my east facing view. The Landscape and Visual Impact Assessment accepts that residential receptors are highly sensitive and notes at page 28 that several dwellings lie around the substation. It then provides no dedicated residential assessment. Viewpoints VP4 and VP5 refer to dwellings, but their analysis concerns solar panels, hedgerows and screening, not the substation.

The substation is not comparable to panels no higher than 3.4 m. It includes a compound of about 22,632 square metres, a 438 square metre control building, a 590 square metre IPP building, two transformers, 2.6 m fencing, lighting masts, lightning protection masts of about 18 m and lattice support structures of 37.5 m. The argument that low structures will be screened by landform and vegetation cannot be applied to masts and towers of this height. No ZTV analysis or visualisation from the nearest houses has been provided. The applicant also relies on planting that the LVIA accepts needs a three year establishment period, with no views shown for winter or for year ten.

II. NOISE AND VIBRATION

This is my priority concern. I wear hearing aids and am already badly affected by background noise, and prolonged exposure can affect my mental health. I chose a remote rural setting with no expectation of noise and vibration of this kind. The applicant acknowledges continuous noise from transformers and associated plant. With a direct line of sight and prevailing winds, I am concerned that it will carry to my home.

The noise assessment on file, Appendix S, is titled for the Greenhills Renewable Energy Park and covers the solar farm, battery compound and substation together. It is not an assessment of this application. The closest distances in Table 1.1, 5 m and 8 m, are to the energy park boundary, not to the compound on

drawing 300101185-DR-213. No distance from the compound or access to any house is given. Chapter 15 of the Planning and Environmental Report and section 3.7.6 of the EIA Screening Report rely on that assessment, and there is no EIAR.

Construction is estimated at about 16 months (section 5.5.6.1). The report's own BS 5228 test is 65 dB at a house for more than 10 days in 15 or 40 days in six months. No level has been calculated for this platform, the access, or haulage to Site Access No. 1 on the R634. The fill figures are also inconsistent. Drawing DR-213 gives a cut of 17,304 cubic metres and a larger fill, its notes give a different fill figure, and section 5.5.6.1 gives a third, 25,013 cubic metres, while claiming all excavated material will be reused. Imported fill, 9,490 cubic metres of capping stone and transformer deliveries will generate noise and vibration that have not been assessed. No operational assessment of the permanent station at the nearest homes has been provided.

III. ARCHAEOLOGY

I am deeply concerned about the proximity of this development to Ardagh church and cemetery and to the Rath fort. Appendix R relies on solar measures, namely non-intrusive gabion or ballasted foundations, to preserve anomalies M1 to M4. These cannot apply to a compound formed by cut and fill, as drawing DR-213 shows. The geophysical survey under licence 26R0042 covered a significant portion of the site, not all of it, and the applicant does not state that the compound, tower bases or widened access were surveyed.

Monitoring during construction (paragraph 6.34) and preservation in situ "where feasible" (paragraph 6.35) come too late for a platform already approved. Cork County Council told the applicant on 10 February 2026 that a sub-surface assessment was required for the solar application, and the same standard should apply here. The hillfort CO067-001001 in Rath townland, 490 m west of the boundary, is described as occupying a commanding position, yet there is no assessment of the effect of a permanent compound, masts and towers on its setting.

IV. EMERGENCY RISK AND FIRE

The station will contain two oil-filled transformers, a diesel generator and a fuel tank. Section 3.7.8 and Table 4.1 of the EIA Screening Report rate the risk of major accidents as low but do not assess a fire at the transformers or diesel tank, as Schedule 7 of the Planning and Development Regulations 2001, as amended, requires the risk of major accidents to be considered. The oil volume is not stated. Drawing DR-200 says bunds are "TBC at Detailed Design" and shows a separator and soakaways, so it is not demonstrated that contaminated firefighting water would be retained.

No fire appliance swept path, gate width or turning assessment is provided for the route from Site Access No. 1 to the transformer bays. Appendix M is a traffic assessment for the wider energy park, not this route. Since the station is permanent, these matters must be resolved before a decision, not left to detailed design. I am not aware of any statement from the emergency services on their capacity to respond.

V. PUBLIC CONSULTATION

The applicant's Appendix A shows that direct engagement was limited to about 342 houses within 1.5 km, and that letters were returned undelivered because they did not carry a resident's name. Much of the August engagement consisted of pre-booked individual appointments rather than open public presentation. Newsletter 2 stated that the layout was still being drafted, and residents were told photomontages would follow with the application. Most engagement therefore preceded the information now before the Commission. I understand that other residents requested meetings that were not facilitated,

and the leaflets carried the name of a previous company.

VI. BIODIVERSITY

The area supports a large wildlife population. I see bats here every night, and badgers are also likely to be present. I ask that the effects of construction, lighting and permanent operation on these species be properly assessed.

CONCLUSION

For these reasons, the application does not contain adequate assessment of the substation as a permanent development. I respectfully ask the Commission to refuse permission or, at minimum, to request further information on the matters raised, including a dedicated residential visual assessment, a noise and vibration assessment specific to this application, sub-surface archaeological information, and a fire and emergency access assessment.

Is mise,

Carmel Walsh