Catherine Hennessy
Ballyre Killeagh
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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,

Scope of this Observation

I make this Observation as a local resident and health care worker living more than 5km from the site. It concerns only the substation application. I am aware that the solar farm and battery storage are the subject of a separate application. However, the substation is permanent infrastructure. If the solar farm is decommissioned after 40 years, the substation will remain, and it must be assessed for its own lasting effects.

Visual Impact

As a local resident, I am concerned that this development will be visible from all directions. The Landscape and Visual Impact Assessment (LVIA) uses GLVIA3 methodology, a 5km study area and 24 viewpoints. It accepts that residential receptors are highly sensitive and, at page 28, acknowledges that several dwellings lie in the surrounds of the substation. It then provides no dedicated residential assessment of the substation itself.

The substation includes a compound of approximately 22,631 square metres, a 438 square metre control building, a 590 square metre IPP building, two 220kV transformers, outdoor electrical equipment, a 2.6m perimeter fence, lighting and lightning protection masts of approximately 18m. The LVIA accepts that these structures are larger than the solar panels, yet its viewpoint analysis is built around the solar array. At VP5, described as representative of local dwellings, and at VP4, the discussion concerns panels, hedgerows and screening, not what residents will see of the substation.

The argument that structures not exceeding 3.4m will be screened by vegetation and landform cannot be applied to 18m masts or to the 37.5m lattice support structures. These may rise above hedgerows and trees. No Zone of Theoretical Visibility analysis or photomontage from the nearest houses demonstrates otherwise.

The LVIA also relies on new hedgerow and woodland planting, and accepts that this will be in an establishment phase for three years after planting. There is no assessment of what residents will see on

completion, after three years, after ten years, or in winter when deciduous screening is bare. In my view the LVIA is inadequate for a large electrical installation beside homes.

Cumulative Effect

Many of the roads serving this area are minor and cannot handle construction and servicing traffic. The construction traffic for the substation is proposed to use the R634, and this must be considered together with other projects in the area.

A 110kV substation has already been permitted under PA04.309121, approximately 4km from the proposed 220kV substation. Both would sit within a cluster that includes the proposed solar farm and the permitted Lyrenacarriga Wind Farm. Both substations are proposed to use the R634 for construction traffic. Overlapping heavy goods vehicle and abnormal load movements, noise, dust and road safety impacts on residents and other road users have not been assessed together.

Cork County Council, in its assessment of Planning Ref. 25/6876, asked for the cumulative effects of the solar farm and the Lyrenacarriga Wind Farm to be addressed in the LVIA. The subsequent submission under Planning Ref. 26/2133 did not adequately do so, and the 220kV substation does not appear to have been properly taken into account in it. Separate applications should not allow the combined effects of one energy cluster to go unexamined. The Commission should require a cumulative assessment, both spatial and temporal, covering landscape, visual and construction effects.

Site Location and Alternatives

The environmental assessment documentation must include a description of the reasonable alternatives studied, with the main reasons for the choice made, having regard to the effects on the environment. This arises from the EIA Directive (2014/52/EU), as transposed in the Planning and Development Regulations 2001 as amended (Schedule 6), and is reflected in the EPA Guidelines on Environmental Impact Assessment Reports (2022).

I could find no comparative assessment of alternative sites along the 220kV route. The Blackwater SAC is mentioned as a constraint, but no other locations appear to have been compared against defined criteria. The site appears to have been chosen principally because landowner agreement was available. That is a commercial convenience, not a planning rationale. The applicant's own documents indicate significant impact on over 300 homes, and alternatives might well have reduced this.

The drainage assessment (Appendix B) appears to rely on fieldwork carried out in dry summer conditions, although the site is known to suffer from wetland conditions. Road appendices understate the unsuitability of the access road for heavy goods vehicles and emergency vehicles, especially in wet conditions. I also could not find letters of support from EirGrid or ESB Networks for this particular location.

Lack of Public Consultation

Appendix A (Summary of Engagement 2025) records that Newsletter 1 was delivered to approximately 342 houses within 1.5km, with 42 households within 1km spoken to directly. In August 2025 invitations were posted to 334 houses within 1.5km. The applicant acknowledges that some letters were returned undelivered because they lacked a resident name, and I understand that not all houses received the newsletters. No justification is given for the 1.5km cut-off, although landscape, traffic and cumulative effects reach well beyond it.

The August sessions at Inch Community Centre largely consisted of pre-booked individual appointments,

with 36 face-to-face meetings in the first two days. This is not an open forum where the whole proposal and its cumulative effects could be discussed. I understand that other residents requested one-to-one meetings that were not facilitated.

Newsletter 2 stated that the layout was still being drafted and showed only a study area. Residents who raised visual concerns after Newsletter 3 were told that photomontages would follow with the application. Much of the engagement therefore took place before the public could see the final layout, assessments and photomontages now before the Commission.

Wildlife and Fauna

I am also concerned about harm to wildlife and fauna in the area as a whole. Given the scale of the cluster and the proximity of the Blackwater SAC, the Commission should be satisfied that the ecological and cumulative effects of the substation have been fully assessed, including under the Habitats Directive where required.

Conclusion

For the reasons above, I respectfully ask the Commission to refuse permission. At a minimum, I ask the Commission to request further information, including a dedicated residential visual assessment of the substation with ZTV analysis and photomontages, a cumulative assessment of all related infrastructure and traffic, and a comparative analysis of reasonable alternative locations.

Thank you for considering this Observation.

Is mise,

Catherine Hennessy