Ciaran & Mary Coleman
Fern Grove
Mount Uniacke
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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,

We are residents of this community, living more than 5km from the site, and we wish to object to this application. This Observation concerns only the substation and loop-in. The station is sought permanently and, per section 6.3 of the Planning and Environmental Report, will be handed to the network operator and not decommissioned. It must therefore be assessed as a permanent installation, whatever becomes of the separate solar application.

1. Emergency Risk and Fire

Section 4.3 describes up to two 220kV transformers, which the site notice describes as oil-filled and bunded, together with a diesel generator and fuel tank. Schedule 7 of the Planning and Development Regulations 2001, as amended, requires consideration of the risk of major accidents and disasters. The EIA Screening Report deals with this at section 3.7.8 and rates the risk as Low in Table 4.1. However, that section addresses concrete, hydrocarbon spills from construction plant and site accidents. It does not assess a fire at the transformers or the diesel tank. The oil volume is not stated. Drawing 300101185-DR-200 says bunds are "to be fitted with TBC at Detailed Design". It does not show firefighting water being retained in a bund rather than passing through the separator to the soakaways, and no firefighting water supply is described.

Access is equally unaddressed. The route a fire appliance would use is the red access to Site Access No. 1 on the R634 (drawing 300101185-DR-100B). The application contains no swept path, gate width or turning assessment for it, and Appendix M concerns the wider energy park, not this route. We know how narrow the surrounding roads are. No arrangement is offered for the evacuation of neighbouring households. These matters should be demonstrated now and not left to detailed design.

2. Archaeology

Appendix R assesses the wider renewable energy site, and its avoidance measures, namely non-intrusive gabion or ballasted foundations and buffers, are solar measures. They cannot apply to a compound formed by cut and fill. Drawing 300101185-DR-213 shows a cut of 17,304 cubic metres into rising ground to a finished level of 109.05m.

The geophysical survey (licence 26R0042) covered a significant portion of the site, not all of it. The applicant does not state that the compound, tower bases or access widening lay within the surveyed area. The May 2025 walkover recorded only the surface. Monitoring during construction (paragraphs 6.34 and 6.35) will in practice record what the excavator finds and then build, because preservation in situ is unlikely to be feasible on a platform that must be cut to level. At paragraph 3.14 of Appendix R, Cork County Council is recorded as requiring a sub-surface archaeological assessment before the solar application could be examined. The same standard should apply to the permanent part of this project.

The hillfort at Rath (CO067-001001), 490m west of the site boundary, is described at paragraph 4.15 as occupying a commanding position, yet its setting is not specifically assessed against a permanent compound, lightning masts and new towers. We also understand that Ardagh graveyard and church bound the site, and we ask that the effect on both be specifically assessed.

3. Noise and Vibration

Appendix S is written for the Greenhills Renewable Energy Park as a whole. The 5m and 8m distances in Table 1.1 are measured to the energy park boundary, not to the compound or this access, and no distance to any house is given for either. The report's own BS 5228 test at section 1.2.5.1 is 65 dB at a house for more than 10 days in any 15, or 40 days in six months. The substation works are put at about 16 months (section 5.5.6.1), so the duration limb is met if the level is. That level has not been calculated for this platform or access.

The fill figures are also inconsistent. Drawing DR-213 gives more than one fill volume, and section 5.5.6.1 gives 25,013 cubic metres and says all excavated material will be reused. That cannot be reconciled with a drawing on which fill exceeds cut. Imported fill, 9,490 cubic metres of capping stone and the delivery of two transformers of about 150 tonnes each mean heavy traffic on the access and the R634. This has not been assessed for this application.

4. Visual Impact

The LVIA acknowledges that residents are highly sensitive receptors and that several dwellings lie in the surrounds of the substation. Yet the viewpoints that represent homes, such as VP4 and VP5, discuss panels and hedgerows, not the substation. There is no dedicated residential assessment of the 2.6m fence, the 438 square metre control building, the 590 square metre IPP building, the transformers, the lighting or the lightning masts of approximately 18m. The reasoning that 3.4m panels are screened by vegetation and landform cannot be transferred to masts of that height or to 37.5m lattice structures. The LVIA relies on planting that has a three year establishment period. It does not show what residents will see on completion, after three years, after ten years, or in winter. Zone of theoretical visibility analysis and photomontages from the nearest houses are needed.

5. Location and Alternatives

The compound covers about 22,631 square metres in a rural but well populated area where meaningful screening is not credible. The application is supported by a screening report and no EIAR. We have found no comparison of reasonable alternative sites along the 220kV route, and site selection appears to rest on land availability. Because the station is permanent, it becomes the anchor for later development nearby. Although our home is 5km away, we are concerned about what may follow, and we ask the Commission to consider whether the scale is proportionate to this landscape.

Conclusion

For these reasons, we respectfully ask the Commission to refuse permission. If it is minded to proceed, we ask that it first seek further information on the fire risk assessment and emergency access, a site-specific archaeological assessment, a noise and vibration assessment of these works, a residential visual assessment and a reasoned comparison of alternatives.

Thank you for considering this objection.

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Ciaran & Mary Coleman