Conor and Carmela Hogan,
Kilnatoora,
Youghal,
Co. Cork

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 wish to formally object to the above Strategic Infrastructure Development application on the grounds that the proposed development, by virtue of its scale, nature, height, industrial character and associated infrastructure, has the potential to result in significant adverse impacts on the surrounding rural environment, residential amenity, landscape character, biodiversity and the local road network.
Having considered the nature and extent of the proposed works, I have serious concerns regarding the appropriateness of the development at this location and the long-term implications for the surrounding community.

1. Scale and Industrialisation of the Rural Landscape

The proposed development represents a substantial industrial infrastructure installation in a rural setting. The construction of a 2.2-hectare 220kV Air Insulated Substation, together with an Independent Power Producer compound, transformers, steel lattice towers, overhead electricity lines, gantries and associated electrical infrastructure, will fundamentally alter the existing character of the area.
The development is not simply a small-scale grid connection facility. It involves a considerable concentration of industrial infrastructure, including multiple buildings, electrical equipment, security fencing, access roads, lighting and substantial structures. The cumulative effect of these elements will be to introduce an industrial character into an area which should be protected from inappropriate and excessive development.

2. Visual Impact and Landscape Amenity

I have particular concerns regarding the visual impact of the proposed development. The application includes; a 37.5-metre-high lattice telecommunications support structure carrying antennas and dishes; 20-metre-high temporary conductor attachment gantries; Steel lattice electricity transmission towers; 18-metre-high lightning protection monopoles; and substantial electrical infrastructure, transformers and associated gantries.
These structures will be highly visible features within the surrounding landscape and may have a significant adverse effect on the visual amenity of the area. The proposed landscaping and screening measures cannot reasonably be expected to conceal structures of this height and scale.

The Planning Authority should consider whether the visual assessment adequately represents the nearest residential properties and view; full height of substation; seasonal variations and proposed screening. It should also consider whether the substations permanent industrial appearance is compatible with the charter and visual amenity of the immediate rural environment.
The Planning Authority should also consider whether the applications takes into consideration the illumination effect of security and compound lighting on neighbouring properties and the surrounding countryside. The introduction of artificial lighting into an otherwise predominantly rural nighttime environment has the potential to adversely affect residential amenity the existing nighttime character and natural wildlife.

3. Impact on Residential Amenity

The potential impact on nearby residents must be given serious consideration. The operation of a large 220kV electricity substation and associated transformers may result in continuous operational noise, including transformer hum, cooling equipment noise and other electrical equipment noise.
There are also concerns regarding; construction noise and vibration; operational noise during both daytime and night-time periods; security lighting and light pollution; and visual intrusion.
The applicant should demonstrate, through independent and comprehensive assessments, that the proposed development will not adversely affect the local archaeology of Rath Fort approx. 700m from proposed site the quality of life of people living in the surrounding area. Any noise assessment should consider cumulative noise from the entire development, rather than assessing individual pieces of equipment in isolation.

4. Traffic and Road Safety

The proposed development will require substantial construction activity, including the transportation of heavy electrical equipment, transformers, building materials, machinery and other construction supplies. The application includes a new internal access road with an entrance off the R634.
I am concerned about the potential impact of construction traffic on the local road network, particularly given the rural nature of the surrounding roads and the potential for large and heavy vehicles to use these routes. Consideration is requested if the proposed substation construction traffic has been adequately quantified and distinguished from traffic associated with the wider solar development and if the road network have sufficient capacity to accommodate the proposed construction vehicles.

5. Drainage, Flood Risk and Contamination.

The proposed development includes significant site reprofiling involving cut and fill works, together with surface water and wastewater drainage infrastructure. These works have the potential to alter existing drainage patterns and increase surface water runoff, particularly during periods of heavy rainfall and potentially contaminate groundwater pathways.
The applicant must demonstrate that the development will not increase flood risk on neighbouring lands and wells or adversely affect local watercourses, groundwater or drainage systems which previously has been subject to flooding. The substation is being proposed to be built on land known locally as Cronin's Bog.

6. Cumulative Impact of the Greenhills Renewable Energy Park

I note that a separate planning application had been submitted to Cork County Council for the proposed Greenhills Renewable Energy Park in the townlands of Knocknagappagh, Barnaviddane, Ballyneague, Ballydaniel and Youghal (subject to confirmation of the complete application description).
This is particularly relevant because the proposed substation and associated grid infrastructure appear to be directly connected with the wider renewable energy development. The two applications should therefore be considered in terms of their combined and cumulative effects

on the local environment and community. The environmental assessment should address the combined impacts of the solar farm and associated infrastructure, including construction activity, traffic, landscape changes, noise, drainage, biodiversity and the overall industrialisation of the rural landscape.
The potential for the development to establish a precedent for further large-scale energy infrastructure in the area should also be considered. The cumulative effect of the Lyrenacarriga wind farm substation and BESS located 4km from this proposed site should be considered.

7. Permanent Permission and Future Use of the Infrastructure

I am particularly concerned that the applicant is seeking permanent planning permission for the loop-in grid connection to the existing Knockraha-Cullenagh 220kV overhead line and the 220kV Air Insulated Substation. The application states that these elements will remain in place following the decommissioning of the solar farm and that the substation will ultimately become an asset of the national grid under EirGrid management.
The permanent retention of substantial electricity infrastructure means that the impacts of the development will extend well beyond the operational lifetime of the associated solar farm.
The permanent nature of this infrastructure should not be treated as a minor or incidental element of the application. It represents a significant and potentially irreversible change to the character of the area with a considerable lack of public consultation.

For the reasons outlined above, I respectfully request that An Coimisiún Pleanála refuse permission for the proposed development.

Is mise,

Conor and Carmela Hogan.