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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,

I am a resident living between 1 and 5 km from the proposed development. This Observation concerns the substation application only. The solar farm and battery storage are a separate application, but the substation is permanent and would remain after the solar farm's 40 year life. We chose to live here for its rural location, and we want our children to grow up in a peaceful, healthy and safe environment. I am also concerned about the effect on the value of our home.

(a) Cumulative Effects
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This is my principal concern. In its assessment of Planning Ref. 25/6876, Cork County Council asked that the landscape and visual assessment address the cumulative effects of the proposed 800 acre solar farm and the permitted Lyrenacarriga Wind Farm. The later submission under Planning Ref. 26/2133 did not adequately provide that assessment, and it did not properly take this 220kV substation into account.

Two substantial substations would stand approximately 4 km apart: the permitted 110kV substation (PA04.309121) and the proposed 220kV substation. Dealing with them in separate applications should not leave their combined landscape, visual and construction effects unassessed. The EIA Directive, at Annex IV, requires cumulation with other existing and approved projects to be considered.

Construction traffic for both substations is proposed to use the R634. Overlapping programmes, heavy goods vehicles and abnormal loads create cumulative impacts of noise, dust, disturbance and road danger. We have four children, two of whom can wander off without warning and do not understand road risks. We live close to main roads that construction traffic would use, so this is a real safety concern for our family. The Commission should require a combined assessment of the solar farm, the wind farm and both substations, considered over space and time, including overlapping construction traffic.

(b) Water Pollution
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We have a well on our property. The applicant's own CEMP acknowledges a construction pollution risk and requires the programme to address risks to watercourses in each phase (CEMP Section 2.4, page 9). The site drains through the Carignass, Knocknappagh, Ballyleague, Ballygarvin and Youghal Park streams and the Tourig and Glendine rivers to the River Blackwater, a European designated site. The CEMP also records EPA designated drinking water rivers as sensitive receptors (Sections 3.1 and 3.5).

The substation requires major cut and fill, with approximately 13,600 cubic metres of topsoil and 39,690 cubic metres of subsoil recontoured over 4.71 hectares (CEMP Appendix B, pages 3 and 4). This exposes a large area to rainfall and creates a silt and sediment risk. The site is largely underlain by the Glenville Groundwater Body, a locally important aquifer, and the CEMP classes most of the site as high groundwater vulnerability, and extreme in places to the south. Despite this, surface water is to go to infiltration and soakaway areas, including a 5m x 5m x 1.8m soakaway within the compound (CEMP Sections 3.2.2, 3.3 and 3.4). Two 33/220kV transformers will contain oil. The applicant's own Water Quality Monitoring Plan accepts that accidental spillages and leaks remain a risk despite mitigation (CEMP Appendix C, Section 11.5.4.4). The extensive controls proposed, including daily pH testing and continuous runoff monitoring, indicate how serious the risk is. The application does not show what water will reach the soakaway or how it will be treated first. Given the sensitivity of the aquifer and the Blackwater, I ask the Commission to consider carefully the Habitats Directive requirements for appropriate assessment and the Water Framework Directive objective of no deterioration.

(c) Archaeology
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Appendix R assesses the wider renewable energy site, and its avoidance measures are solar measures. It relies on gabion or ballasted foundations and stand-off buffers to preserve anomalies M1 to M4 in situ. These cannot apply to the compound. Drawing 300101185-DR-213 shows a platform formed by cut and fill at a finished level of 109.05 m, with a cut of 17,304 cubic metres and a fill of 34,669 cubic metres.

The geophysical survey (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 sections were within the surveyed area. The walkover of 14 to 16 May 2025 records surface observations only. Paragraphs 6.34 and 6.35 of Appendix R leave the matter to monitoring during construction, when preservation in situ will not be feasible. Paragraph 3.14 records Cork County Council's view, on the solar application, that sub-surface archaeology must be assessed before a decision. The same standard should apply here.

The hillfort in Rath townland (CO067-001001), 490 m west of the site boundary, is described at paragraph 4.15 but its setting is not specifically assessed against a permanent compound, lightning masts and new towers. A monument of this kind suggests further unrecorded archaeology nearby. Any decision should have regard to the National Monuments Acts 1930 to 2014.

(d) Visual Impact
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The LVIA uses a 5 km study area and 24 viewpoints, and accepts that residential receptors are highly sensitive. At page 28 it notes several dwellings around the substation. However, it does not provide a dedicated assessment of the substation as seen from those homes. VP4 and VP5 concern dwellings, yet their discussion focuses on solar panels, hedgerows and screening.

The substation is a far more substantial built form: a compound of approximately 22,631.71 square metres, a 438 square metre control building, a 590 square metre IPP building, two transformers, a 2.6 m

fence, lighting, lightning masts of approximately 18 m and lattice structures of 37.5 m. Reasoning that 3.4 m panels will be screened by hedgerows cannot be transferred to structures of this height. The LVIA also relies on planting that is in an establishment phase for three years. Residents are entitled to see views from the nearest houses at completion, after three years, after ten years, and in winter, supported by ZTV analysis.

(e) Lack of Public Consultation

The applicant's Appendix A shows that direct engagement was limited to about 342 houses within 1.5 km, with 42 households spoken to directly. Some letters were returned undelivered because they lacked a resident's name. No justification is given for the 1.5 km boundary, although traffic, landscape and cumulative effects reach further. The August sessions were mainly pre-booked individual appointments, and many requests for meetings were not facilitated. Newsletter 2 stated that the layout was still being drafted, and residents were told photomontages would follow with the application. Consultation on a concept is not informed participation in the project as submitted.

For these reasons, I respectfully ask the Commission to refuse permission. At minimum, I ask that further information be requested on the cumulative, hydrological, archaeological, visual and traffic matters raised above.

Is mise,

Emma Clifford