Eugene & Mary Power & family
Ballyglavin
Youghal
Co Cork

21st 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 living around 500 metres from the proposed development, and we make this Observation on the substation application only. The separate solar farm and battery storage application is not the subject of this letter. The substation and loop-in are sought as permanent development that would remain after any solar farm is decommissioned. They must therefore be assessed as permanent.

Site Location and Alternatives

The site lies off the R634 Youghal-Tallow Road, in an area of scenic beauty and close to the River Blackwater Special Area of Conservation. The surrounding landscape has no substantial hedgerows for a considerable distance, so effective screening of an installation of this scale is not realistic.

The application is supported by an EIA screening report but there is no EIAR. The EIA Directive 2011/92/EU, as amended by 2014/52/EU, and Schedule 6 of the Planning and Development Regulations 2001 require information on the reasonable alternatives studied and the reasons for the choice made. We cannot find a comparison of alternative sites along the 220kV route. No clear selection criteria are set out, and the choice appears to rest on landowner availability rather than objective assessment. The applicant's own material shows significant effects on more than 300 homes, and a proper comparison might have identified a location with far less residential impact. We also find no letter of support from EirGrid for this location.

The access is a further concern. The road to the site is poorly suited to heavy goods vehicles and to emergency vehicles, particularly in wet winter conditions. The drainage work in Appendix B appears to have been carried out in dry summer conditions, on land that is known to be wet.

Lack of Regulatory Guidance

There are no national guidelines specifically governing the siting of substations and utility scale energy infrastructure. This leaves decision makers without clear criteria and communities without certainty. Climate objectives are important, but Section 15(1) of the Climate Action and Low Carbon Development Act 2015 requires the Commission to have regard to them only so far as practicable. They do not displace the need for full assessment of landscape, ecology, residential amenity, heritage and cumulative impact. We ask the Commission to set out clearly why this location is the right one, and not to rely on climate policy alone. We also ask that the Commission carry out its own independent assessment and not rely on the applicant's documents. We note that Cork County Council has previously treated two related applications as invalid, and local planning knowledge should carry weight.

Visual Impact

This substation will be a permanent presence in a landscape we value. It will also block our view of the Rath fort, which is one of the most impressive in Ireland.

The LVIA uses 24 viewpoints but concentrates on the solar panels, which rise no more than about 3.4 metres. It acknowledges that residential receptors are highly sensitive and that several dwellings surround the substation. However, it does not provide a dedicated assessment of what the substation will look like from the nearest houses. The substation compound is approximately 22,631 square metres. It includes a 438 square metre control building, a 590 square metre IPP building, two 220kV transformers, a 2.6 metre perimeter fence, lighting, and lightning protection masts of about 18 metres. Viewpoints such as VP4 and VP5 describe nearby dwellings but discuss panels and hedgerows, not these structures.

Reasoning that a low panel will be screened cannot be applied to masts of 18 metres or lattice structures of 37.5 metres. The LVIA also relies on new planting that needs at least three years to establish. We ask for residential visual assessment, with ZTV analysis and photomontages from the nearest homes, showing views at construction, after three and ten years, and in winter.

Cumulative Effect

Planning permission already exists for a wind farm in the area, which we understand to comprise 17 turbines, and for a separate substation (PA04.309121). The burden placed on our small community is disproportionate. Cork County Council asked for a cumulative landscape and visual assessment in its consideration of Ref. 25/6876, and we do not believe the later submission under Ref. 26/2133 adequately provided it. Nor does the 220kV substation appear to have been properly included in that assessment.

Construction traffic for both substations is proposed to use the R634, so overlapping HGV movements, noise, dust and road safety effects need joint assessment. The fact that these are separate applications should not allow their combined effect to go unassessed. Our concern is also about the future of our community. We have six children, and one has already emigrated to Australia. We fear that a place overtaken by energy infrastructure will drive young people away.

Noise and Vibration

The noise assessment is Appendix S, which 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 permanent substation and its access. Table 1.1 gives distances only to the energy park boundary, such as 5 m and 8 m, and gives no distance from the compound or from Site Access No. 1 to any house. The BS 5228 test in section 1.2.5.1 is 65 dB at a dwelling for more than 10 days in any 15, or 40 days in six months. The works are estimated at about 16 months in section 5.5.6.1, yet no level has been calculated for this platform, this access or the haul route. The 23 to 45 dB range in Table 1.28 is not such a calculation.

The earthworks figures are also inconsistent. Drawing 300101185-DR-213 shows a cut of 17,304 cubic metres and a fill of 34,649 cubic metres, while its notes state 36,649 cubic metres, plus 9,490 cubic metres of capping stone. Section 5.5.6.1 gives 25,013 cubic metres and says all excavated material will be reused. These cannot all be correct, and the imported material means more HGV traffic on the R634 than has been assessed.

Construction noise will make it very difficult for people to work from home or for night workers to sleep. It will be particularly hard for residents with sensory needs, such as dementia or autism. After construction, we will be left with a constant electrical hum that we did not expect when we built our home here. No operational noise assessment of this substation has been provided.

Conclusion

For these reasons, we respectfully ask the Commission to refuse permission. At a minimum, we ask the Commission to request further information, including an EIAR, a comparison of reasonable alternatives, a residential visual assessment, a cumulative assessment, and a noise and vibration assessment specific to this substation and its access.

Is mise,

Eugene and Mary Power