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The Secretary,
An Coimisiun Pleanala,
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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

Introduction

We wish to make an observation in relation to the proposed Greenhills 220 kV Substation.

While we support the transition to renewable energy and recognise the importance of strengthening Ireland's electricity network, we have significant concerns regarding the location, scale and long-term implications of the proposed development. In particular, concerns arise in relation to the permanent industrialisation of a rural area, the lack of a demonstrated assessment of alternatives, the adequacy of the assessment of battery fire risks, landscape and visual impacts, cumulative impacts, and the potential effects on adjoining lands and local residents.

We respectfully request that these matters be carefully considered before any planning decision is made.

1. Permanent Industrialisation of a Rural Landscape

A particularly significant concern is that the proposed 220 kV substation is intended to become a permanent component of the national transmission network.

Unlike many renewable energy developments, which are granted permission for a defined operational lifespan and are frequently subject to decommissioning and site restoration requirements, the proposed substation represents the establishment of permanent strategic electrical infrastructure within a rural agricultural landscape.

The planning authority should recognise that the substation is not merely ancillary to a renewable energy project but constitutes a long-term industrial facility with potentially enduring impacts on the character of the area. The permanence of the development materially differentiates it from the associated renewable energy infrastructure and warrants separate and detailed consideration of its long-term planning implications.

2. Lack of Demonstrated Assessment of Alternatives

The environmental documentation assesses the impacts of the proposed substation at the selected location but does not appear to demonstrate that reasonable alternative sites or layouts were examined and compared.

Good planning practice requires consideration of whether alternative locations could avoid or reduce adverse environmental, visual or residential impacts. In particular, it is not evident from the submitted documentation that:

- Alternative substation locations were examined;
- Alternative layouts within the application lands were considered;
- The selected location was demonstrated to be the least environmentally damaging option.

Without a transparent assessment of alternatives, it is difficult for both the public and the planning authority to determine whether the proposed siting represents the most appropriate planning solution.

Accordingly, further information should be sought detailing the alternative locations and configurations considered during project development and the reasons those alternatives were rejected.

3. Reliance on Mitigation Rather Than Impact Avoidance

A recurring theme within the environmental documentation is the conclusion that impacts will not be significant because mitigation measures will be implemented.

This approach appears to be relied upon across several environmental topics, including:

- Water quality;

- Biodiversity and ecology;
- Archaeology;
- Traffic and transportation;
- Landscape and visual impacts;
- Flood risk.

While mitigation measures can play an important role in reducing impacts, planning decisions should not rely excessively on measures that require future implementation, monitoring or enforcement.

The planning authority should therefore satisfy itself that all proposed mitigation measures are:

- Clearly specified;
- Technically feasible;
- Fully funded;
- Enforceable through planning conditions;
- Capable of being maintained for the lifetime of the development.

Where impacts can only be rendered acceptable through mitigation, a higher level of scrutiny is warranted.

4. Landscape and Visual Impact

The proposed development would introduce significant industrial infrastructure into an area characterised primarily by agricultural land use and rural landscape character.

The development includes:

- A 220 kV substation;
- Telecommunications equipment;
- Security fencing;
- External lighting and ancillary infrastructure;
- Lightning protection structures and associated equipment.

The submitted landscape assessment acknowledges visual effects in the surrounding area. However, concerns remain regarding the extent of the long-term visual impact, particularly when the various project elements are viewed cumulatively.

Potential impacts may arise from viewpoints including:

- Nearby residences;
- Public roads;
- Agricultural holdings;
- Recreational routes and local viewpoints.

Given the permanent nature of the development, additional photomontages and visualisations from representative viewpoints should be provided to allow a more comprehensive assessment of the likely visual effects.

5. Impact on Adjoining Lands and Future Rural Housing Potential

As adjoining landowners, we are concerned about the potential implications of the proposed development for the future use, enjoyment and development potential of neighbouring lands.

The introduction of permanent high-voltage electricity infrastructure and associated industrial development may adversely affect the attractiveness and suitability of adjoining lands for future residential development, including potential housing needs of local family members who may qualify under rural housing policies.

We are particularly concerned that the introduction of permanent strategic electricity infrastructure in close proximity to surrounding properties could adversely affect future opportunities for family members to live and build within the local rural community.

The planning authority should consider whether the development could create indirect constraints on future development opportunities in the surrounding area and whether these potential effects have been adequately assessed.

6. Construction Traffic and Road Safety

The proposed construction programme extends for approximately 21 months and is expected to generate significant construction-related traffic, including heavy goods vehicle movements.

Potential impacts include:

- Increased traffic volumes on rural roads;
- Road safety concerns for local residents and road users;
- Deterioration of road surfaces;

- Noise, dust and general disturbance;
- Interference with agricultural activities and machinery movements.

A detailed Construction Traffic Management Plan should be required and should include:

- Defined haulage routes;
- Measures to protect road safety;
- Road condition surveys before and after construction;
- Procedures for addressing road damage;
- Engagement arrangements with local residents and stakeholders.

7. Potential Noise Impacts

The proposed development has the potential to give rise to significant operational noise impacts which do not appear to have been fully considered. The electrical infrastructure will contain multiple sources of continuous and intermittent noise, including, inverters, transformers and other electrical equipment operating on a 24-hour basis.

Of particular concern is the location of the proposed substation and BESS on elevated ground overlooking a valley. Sound propagation in such topographical conditions can be highly complex, and there is potential for a "canyon" or channelling effect whereby noise travels along the valley and is experienced at greater distances than would normally be anticipated in a flat landscape. The combination of elevated infrastructure, open rural terrain and the surrounding valley topography may increase the audibility of operational noise at neighbouring dwellings and recreational areas, particularly during periods of low background noise, at night-time and under certain meteorological conditions.

The cumulative effect of the planned approximately 56 BESS containers operating in conjunction with the substation should also be carefully assessed. While individual items of equipment may comply with relevant noise limits, the combined operation of numerous cooling systems and electrical components has the potential to create a continuous low-frequency hum or tonal noise which can be particularly intrusive in a rural environment.

We are concerned that the submitted assessment may not fully account for worst-case operating scenarios, seasonal weather conditions, temperature-driven increases in cooling demand, or the effects of local topography on noise propagation. Given the scale of the development and its prominent position overlooking a valley, we

respectfully request that the planning authority require a detailed independent acoustic assessment, including modelling of cumulative operational noise from both the BESS and substation under worst-case operational conditions, together with an assessment of potential low-frequency and tonal noise impacts on nearby residences.

In the absence of such assessment, it cannot be concluded that the development would not give rise to significant adverse noise effects on residential amenity and the enjoyment of surrounding rural properties.

8. Cumulative Impacts

The proposed substation should not be assessed in isolation from the wider energy infrastructure of which it forms a part.

The cumulative effects of:

- The solar development;
- The BESS installation;
- The permanent 220 kV substation;
- Existing and permitted renewable energy developments in the area;

must be assessed collectively to understand the true overall impact on the receiving environment and local community.

Further clarification should be provided regarding the cumulative assessment undertaken and whether all physically and functionally connected elements of the project have been considered together.

Conclusion

The principal concerns regarding the proposed Greenhills 220 kV Substation and BESS can be summarised as follows:

1. The permanent industrialisation of a rural agricultural landscape.
2. The absence of a clearly demonstrated assessment of reasonable alternative sites and layouts.
3. The limited assessment of utility-scale battery fire and major accident risks.
4. Reliance on mitigation measures to conclude that impacts are acceptable.
5. Potential adverse landscape and visual effects.
6. Potential impacts on adjoining lands and future rural housing opportunities.

7. Construction traffic and road safety impacts.
8. Potential shortcomings in the cumulative impact assessment.

In light of the above concerns, we respectfully request that planning permission be refused. Alternatively, we request that substantial further information be sought in relation to site selection, battery fire safety, cumulative impacts, visual assessment and the long-term implications of locating permanent strategic grid infrastructure at this location before any planning decision is made.

Yours faithfully,

Feargal Nolan & Moira Nolan