Ger O' Connell
Ballymackibbot
Inch
Killeagh
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 carpenter and a local resident living between 1 and 5 km from the proposed development, and I make this Observation on my own behalf. I do not object to renewable energy in principle. My concern is the scale, permanence and cumulative context of a 220kV substation in this rural location. This Observation relates only to the substation application. However, the substation will remain in place even if the associated solar farm is decommissioned after 40 years, and it must be assessed on that basis.

I. CUMULATIVE EFFECT

This is my principal concern. The substation cannot reasonably be assessed as an isolated project. In its assessment of Planning Ref. 25/6876, Cork County Council identified the need for a proper cumulative assessment of the approximately 800 acre solar farm and the permitted Lyrenacarriga Wind Farm. I understand that the subsequent application, Planning Ref. 26/2133, did not adequately provide this, and that the 220kV substation was not properly taken into account within it.

A 110kV substation has also already been permitted under PA04.309121, approximately 4 km from the current site. Two substantial substations in one rural area, serving a solar farm and a wind farm, form a cluster of energy infrastructure whose combined landscape, visual and construction effects must be considered together. Construction traffic for both substations is proposed to use the R634, raising the prospect of overlapping heavy goods vehicle and abnormal load movements, with cumulative noise, dust, disturbance and road safety impacts on residents and road users.

The EIA Directive, as amended by Directive 2014/52/EU, and the Planning and Development Regulations 2001 require the cumulative effects of a development with other existing and approved projects to be addressed. Dividing a connected energy cluster into separate applications should not allow those effects to go unassessed, either spatially or over time.

II. LOCATION AND ALTERNATIVES

I question why infrastructure of such an industrial character and scale is proposed on prime agricultural land in a countryside setting. An EIAR must describe the reasonable alternatives studied and give the main reasons for the option chosen, having regard to environmental effects. I could not find a comparative assessment of alternative sites along the 220kV route. The choice appears to rest largely on landowner agreement rather than clear and demonstrable criteria such as environmental constraints and proximity to dwellings. The applicant's own documents acknowledge effects on a large number of homes, which a genuine alternatives analysis might have reduced. The access road also appears poorly suited to heavy goods vehicles and emergency vehicles in wet conditions, and I could not find any letter of support from EirGrid for this location.

III. HYDROLOGY AND FLOODING

Inch has flooded before with devastating effects, and I am concerned that this development will increase that risk. The applicant's Appendix N states that the site is not within a mapped flood zone. It also acknowledges indicative flooding along the adjacent Tourig_020 and Glendine_010 watercourses and records that local knowledge indicates flooding within the same sub-basin (Section 1.8.3, pp.49-51).

Appendix N describes the effect on land occupied by the substation and access tracks as "moderate, adverse and permanent". It records a substation footprint of about 1.8 hectares, excavation of up to about 3.6 metres, combined cut and fill of about 25,013 m3 with the BESS, and about 9,320 m3 of imported stone. The Flood Risk Assessment calculates a 1-in-100-year runoff increase of 0.016 to 0.185 m3/s, up to about 4.15 per cent of the relevant micro-catchment (Section 1.9.1.1, pp.60-61). For a community with direct experience of flooding, that increase is significant. The absence of a mapped flood zone beneath the platform is not the absence of risk. I also question whether site investigations reflected the wet winter conditions for which this ground is known locally.

IV. VISUAL IMPACT

The LVIA uses GLVIA3 methodology, a 5 km study area and 24 viewpoints, and accepts that residents are highly sensitive receptors. At page 28 it notes that several dwellings lie around the substation. Yet the discussion at viewpoints such as VP4 and VP5, which represent residential views, concentrates on solar panels of about 3.4 m in height rather than on the substation.

The substation includes a compound of about 22,631 m2, a 438 m2 control building, a 590 m2 IPP building, two transformers, a 2.6 m fence, lighting, and lightning protection masts of about 18 m. Hedgerow screening that may conceal low panels cannot be assumed to conceal such structures. Reliance on planting with a three-year establishment period, which is also bare in winter, is not a sufficient answer. A dedicated residential visual assessment, with ZTV analysis and photomontages at year one, year ten and in winter, should be required.

V. LACK OF PUBLIC CONSULTATION

I am not aware of any consultation specific to this substation. Appendix A shows that engagement on the wider Greenhills development was directed at about 342 houses within 1.5 km, with 42 households within 1 km spoken to directly. Some August invitations were returned undelivered by An Post. The August sessions at Inch Community Centre were largely pre-booked individual appointments, and Newsletter 2 stated that the layout was still being drafted. The public therefore could not comment on the design now before the Commission, and the choice of a 1.5 km boundary is not justified.

VI. COMMUNITY IMPACT

I am deeply concerned about the long-term effect on our community. I fear that my children and future generations will not wish to live in this area as a result of this development. That would weaken the sense of community here and harm the local clubs, societies and sports groups that depend on people choosing to stay.

VII. CONCLUSION

For these reasons, I respectfully ask the Commission to refuse permission. In the alternative, I ask the Commission to request further information, including a comprehensive cumulative assessment of the permitted 110kV substation, the Lyrenacarriga Wind Farm and the solar farm, including shared R634 construction traffic; a documented comparison of reasonable alternative sites; a winter hydrological assessment; and a dedicated residential visual assessment of the substation.

Is mise,

Ger O' Connell