Geraldine O'Regan
Newtown
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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,

I live around 5km from the proposed development and I travel the R634 every day. This Observation concerns the substation application only. The station is permanent and would remain if the separate solar farm were decommissioned, so it must be assessed on its own merits.

1. Site Selection and Alternatives

The proposed compound would sit in the middle of a rolling rural landscape that this community values. The EIA Directive 2014/52/EU, as transposed by the Planning and Development Act 2000 and the Planning and Development Regulations 2001 as amended, requires an EIAR to describe the reasonable alternatives studied and the reasons for the option chosen. I could not find a comparison of alternative sites along the 220kV route. The choice of this location appears to rest mainly on landowner agreement, which is a commercial convenience and not a planning justification. The applicant's own documents indicate significant effects on a large number of nearby homes, yet no less affected location has been shown to have been tested. I also could not find confirmation from EirGrid supporting this specific site.

2. Archaeology and Cultural Heritage

The area has notable forts, together with Ardagh church and graveyard, and these must be protected. Appendix R, the Archaeology and Cultural Heritage Impact Assessment, covers the wider renewable energy site. Its avoidance measures, namely non-intrusive gabion or ballasted foundations and stand-off buffers, are solar farm measures. Drawing 300101185-DR-213 shows the compound formed by cut and fill, with a cut of 17,304 cubic metres, a fill of 34,669 cubic metres and a finished level of 109.05 m. A platform of that kind cannot be built on gabion foundations, so preservation in situ is not realistic.

The geophysical survey (licence 26R0042, Appendix I of Appendix R) covered a

significant portion of the site and not all of it. The applicant does not state that the compound, tower bases or widened access sections lay within the surveyed area. A walkover on 14 to 16 May 2025 sees only the surface. Paragraphs 6.34 and 6.35 rely on monitoring during construction, with preservation in situ "where feasible". On a platform that must be cut to level, that usually means recording what the excavator uncovers and then building. Paragraph 3.14 records Cork County Council's view, in respect of the solar application, that sub-surface archaeology must be assessed before a decision. The same standard should apply here.

Paragraph 4.15 records the hillfort CO067-001001 in Rath townland, 490 m west of the site boundary, as occupying a commanding position. I could not find a specific assessment of the effect of a permanent compound, lightning masts and new towers on its setting.

3. Visual and Landscape Impact

The R634 is a scenic route that I use daily. The LVIA, prepared by Macro Words Ltd using GLVIA3 with 24 viewpoints, accepts that residents are highly sensitive receptors and notes several dwellings around the substation. However, its analysis is framed around the solar panels. At VP4 and VP5, which are described as residential views, the discussion concerns panels, hedgerows and screening and not the substation.

The substation is a different scale of development. It includes a compound of about 22,631 square metres, a 438 square metre control building, a 590 square metre IPP building, two transformers, a 2.6 m fence, lighting and lightning masts of about 18 m. The application also refers to 37.5 m lattice support structures. The reasoning that a 3.4 m panel is screened by hedges cannot be transferred to structures of that height. No dedicated residential visual assessment, ZTV analysis or photomontage shows these structures from the nearest houses. The LVIA also relies on planting that it describes as being in an establishment phase for three years. The views at completion, at year 10 and in winter should be shown.

4. Emergency Risk and Fire

The station would contain two oil-filled transformers, a diesel generator and a fuel tank. Schedule 7 of the Planning and Development Regulations 2001, as amended, requires consideration of the risk of major accidents and disasters. The EIA Screening Report (section 3.7.8 and Table 4.1) rates that risk as low but addresses only construction spills and site accidents. It does not assess a fire at the transformers or the diesel tank. The oil volume is not stated. Drawing 300101185-DR-200 notes bunds "TBC at Detailed Design" and shows a separator and soakaways, without demonstrating that oil and firefighting water would be retained and not passed to the soakaway.

Access is also unresolved. The access under this application runs from the compound to Site Access No. 1 on the R634 (drawing 300101185-DR-100B). I could not find a fire appliance swept path, a stated gate width or a turning assessment on that route. Appendix M is a traffic assessment for the Greenhills Energy Park and not for this route. The local roads are narrow and

already difficult for ordinary traffic. Bund design, firefighting water and emergency access should be demonstrated now and not deferred to detailed design.

5. Cumulative Effects

This community is being asked to carry a disproportionate share of energy infrastructure. A 110kV substation has already been permitted (PA04.309121), and the permitted Lyrenacarriga Wind Farm is also nearby. Cork County Council asked, under Planning Ref. 25/6876, for a cumulative assessment of the solar farm and the wind farm. The later submission under Planning Ref. 26/2133 did not adequately provide it, and I could not find that this 220kV substation was properly included.

Construction traffic for the two substations is proposed to use the R634, which raises the prospect of overlapping HGV and abnormal load movements, noise, dust and road safety risks for residents. Splitting these projects into separate applications should not allow their combined landscape, visual and construction effects to go unassessed.

Conclusion

For these reasons, I respectfully ask An Coimisiun Pleanala to refuse permission. At a minimum, I ask the Commission to request further information on alternatives, sub-surface archaeology and hillfort setting, residential visual impact, fire and emergency access, and cumulative effects.

Is mise,

Geraldine O'Regan