An Bord Pleanála

Strategic Infrastructure Observation Confirmation

Case Reference Number: VA04.324632

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Dear An Coimisiún Pleanála,

We wish to make a formal objection to the proposed 220kV Air Insulated Substation located in the townlands of Ballyneague, Ballydaniel, Knocknagappagh, County Cork and respectfully request that planning permission be refused.

Considering the proximity of our home to the proposed development, we have direct interest in the practical effects that this proposal could have on the local road network, existing homes, the surrounding environment and the character of the area.

Having considered the application material in the context of the locality in which we live, we have several concerns which we ask An Coimisiún Pleanála to examine carefully.

1. Proposed suitability of the site location

We have concerns about the suitability of this location for a development of this scale and nature. The proposed substation would introduce substantial electrical infrastructure into a rural landscape and in proximity to existing homes and local roads. The decision should consider whether the site is appropriate having regard to residential amenities, landscape character, access constraints, water environment, ecology, archaeology and the cumulative presence of other energy infrastructure in the area.

We ask An Coimisiún Pleanála to assess the site, including the substation compound, access arrangements, cabling, construction areas, drainage, fencing, lighting and ancillary infrastructure, rather than considering the main substation structures in isolation.

The application should also explain the basis for selecting this location and whether reasonable alternative locations or layouts would reduce impacts on residents and the environment.

2. Visual impact and rural landscape character

The proposed 220 kV substation would introduce a substantial concentration of electrical equipment and associated structures into an agricultural landscape. Its visual effects may include the substation equipment itself, gantries, buildings, fencing, gates, lighting, access works, cabling infrastructure and the removal of established vegetation.

The 24 representative viewpoints referred to in the development proposal do not appear to adequately demonstrate the visual impact of the substation and its associated structures themselves. We ask that the visual assessment clearly identify the views from nearby homes, local roads and publicly accessible locations, and assess the development in relevant seasons and lighting conditions.

The assessment should address the effect on the rural character of Cornaveigh and the wider landscape and explain whether existing hedgerows and vegetation will screen the infrastructure effectively over time. Proposed replacement planting cannot immediately reproduce the screening and landscape value of mature vegetation. The visual impact should also be considered cumulatively with the neighbouring Lyrenacarriga Wind Farm and other existing or permitted energy infrastructure.

3. Residential amenity and the character of Cornaveigh

The construction phase is expected to continue for approximately 21 months, with a particularly intensive period of construction traffic.

For people living immediately beside the affected roads, the consequences will extend beyond vehicle numbers. Excavation, trenching, deliveries, heavy machinery and road works have the potential to generate prolonged noise, dust, vibration and general disturbance.

There is also the cumulative effect of these activities on the character of the locality.

Cornaveigh is a rural residential area rather than an industrial setting. The introduction of major construction activity followed by substantial energy infrastructure has the potential to alter the environment experienced by residents on a long-term basis.

I ask that residential amenity be considered in terms of the combined and prolonged effect of the development rather than by assessing individual impacts separately.

4. Wildlife and ecological information from the Cornaveigh area

We have lived in the area for over a year and frequently observe wildlife around our property and the surrounding countryside.

Among the birds we have observed are House Martin, Swallow, Merlin, Northern Wheatear, Goldcrest, House Sparrow, Greenfinch, Linnet, Common Redstart, Grey Wagtail, Yellowhammer and Curlew. We have also observed red squirrels, badgers, bats, pygmy shrews, pine martens and common frogs in the locality. Some of these observations relate to species of conservation concern.

I appreciate that observations by residents do not constitute a substitute for professional ecological surveys. However, they can provide useful information about species activity that may not be captured during limited survey periods.

This is particularly relevant because the proposed works extend beyond the principal substation areas and include access works, cabling, road-related activity and disturbance to existing vegetation.

We therefore ask the Planning Authority to consider whether the ecological information available for the Cornaveigh area is sufficiently detailed to support the conclusions reached in the application, and whether additional targeted surveys are warranted before a decision is made.

5. Bat activity and the need for further consideration

We have observed substantial bat activity around our property, including bats repeatedly using areas close to the proposed works.

Given the proximity of the proposed infrastructure and construction activity, we are concerned that noise, artificial lighting, vibration, machinery and changes to vegetation could interfere with established bat activity.

Bats are legally protected, and we therefore consider it important that the presence and potential use of the area by bats is properly understood before work commences.

We ask the Planning Authority to establish whether appropriate bat surveys have been undertaken in the locations potentially affected by the access and cabling works and, if not, whether targeted surveys should be required.

Attention should be given to potential roosting locations, commuting routes, foraging habitat and the effects of construction lighting and timing.

6. Watercourses, otter and European sites

The proposed development is approximately 2.01 km from the Blackwater River (Cork/Waterford) SAC and approximately 2.1 km from the Blackwater Estuary SPA.

The applicant identifies a potential hydrological connection between the development and these designated sites through surface-water runoff and the Tourig River. The assessment also records otter evidence within the development boundary and identifies construction risks associated with sediment, hydrocarbons and cement.

Given the scale of the proposed ground disturbance and the network of watercourses in the area, we believe this relationship requires careful examination.

We ask the Planning Authority to independently consider whether the proposed mitigation is sufficiently robust to prevent pollution or sediment mobilisation and whether the potential cumulative and in-combination effects have been adequately addressed.

The recorded otter evidence should also be properly considered, including the extent and timing of the ecological surveys and the measures proposed to protect the river corridor and associated habitat.

7. Loss of established hedgerows and habitat value

The application proposes the removal of established hedgerows in connection with entrances, access improvements, gates and fencing.

The EIA Screening Report identifies approximately 260 metres of hedgerow removal associated with entrances and a further approximately 135 metres associated with access improvements and related infrastructure. Planting replacement is proposed.

We are concerned that replacement planting cannot immediately replicate the ecological, landscape and screening functions of established hedgerows.

Mature hedgerows provide habitat and connectivity for birds, bats and other wildlife, as well as contributing substantially to the character of the rural landscape.

The Council should therefore consider not only the eventual intention to replace vegetation, but the period during which the existing habitat will be lost before replacement planting becomes established.

Conclusion

For the reasons outlined above, we respectfully request that planning permission for the proposed 220kV Air Insulated Substation be refused.

In particular, we ask An Coimisiún Pleanála to give careful consideration to:

- the combined construction impacts of Greenhills and Lyrenacarriga;
- the effect of cabling works on existing residential access;
- prolonged impacts on residential amenities;
- the adequacy of ecological and ornithological information for the wider Cornaveigh area;
- bat activity and the potential for disturbance;
- the Tourig River, otter habitat and downstream European sites;
- hedgerow removal and the loss of established habitat;
- decommissioning and restoration of the land; and
- the cumulative effect of large-scale energy infrastructure on the rural character of the area.

We respectfully ask that these matters are fully examined before any decision is made and that further targeted traffic, ecological, hydrological or environmental information be required where the existing application does not provide sufficient evidence to support its conclusions.

Yours sincerely,

Jenifer and William Woerner