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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 resident living approx. 2 km from the proposed development. This Observation concerns only the substation application. The substation is permanent and would remain in place even if the separate solar farm were decommissioned after 40 years.

Wildlife
My main concern is wildlife. Locally we have seen red squirrels, jays, deer, buzzards and barn owls increasing in number. A permanent compound, new towers and lengthy construction works risk reversing that. I ask the Commission to require site-specific survey evidence for these species and to examine the effect of disturbance, lighting and habitat loss on them. I also ask that Appropriate Assessment screening be carried out independently, given the Blackwater SAC.

Traffic and the school
The site is reached by local minor roads and the R634. Farmers already have difficulty moving machinery on these roads. Construction traffic, including heavy goods vehicles and abnormal loads, will pass near the local school, where there are no speed restrictions. I ask the Commission to require a robust road safety assessment, including pedestrian and child safety, the possible need for speed limits, and the suitability of the road for emergency vehicles in wet conditions.

Archaeology
The site lies close to a rath forth and Ardagh cemetery, and other sites may be unidentified. Appendix R assesses the wider renewable energy site, and its avoidance measures are written for solar panels. The four geophysical anomalies (M1 to M4, fields 22, 58, 63 and 66) are to be preserved in situ by gabion or ballasted foundations and buffers. That cannot work for this compound. Drawing 300101185-DR-213 shows a cut of 17,304 cubic metres and a fill of 34,669 cubic metres, with a finished level of 109.05 m cut into rising ground. A platform of that kind cannot sit on gabion baskets, and reliance on reversibility does not suit a permanent 220kV station.

The applicant has not shown that the compound, tower bases or widened access fall within the surveyed

area. The geophysical survey (licence 26R0042, Appendix I) covered a significant portion of the site, not all of it, and omitted south-western fields because of rough ground. The walkover of 14-16 May 2025 could only see the surface. Paragraphs 6.34 and 6.35 rely on monitoring during construction, with preservation in situ preferred "where feasible". On a platform that must be cut to level, it will not be feasible, and monitoring will simply record what is lost.

Cork County Council, in comments of 10 February 2026 quoted at paragraph 3.14, found the solar application incomplete because sub-surface archaeology had not been adequately assessed. The same applicant on the same lands should not be held to a lower standard for the part of the project that involves excavation. Finally, paragraph 4.15 records a hillfort, CO067-001001, 490 m west of the site, yet no specific assessment of the effect of a permanent compound, lightning masts and new towers on its setting is provided.

Regulation and compliance

The Commission is the competent authority under the EIA Directive (2011/92/EU as amended by 2014/52/EU) and must be satisfied for itself that the assessment is complete, including cumulative effects and any scientific doubt, rather than relying on applicant material. Section 15 of the Climate Action and Low Carbon Development Act 2015 imposes a qualified duty, so climate benefit cannot replace a full weighing of landscape, ecology, agriculture, heritage and infrastructure considerations. I understand there are no national guidelines for utility scale energy projects, which makes careful scrutiny more important. I understand Cork County Council has declared two related applications invalid. I am also concerned about the landowner's compliance history, including an alleged unauthorised dump near a water source close to the tourist area and Inch village. I ask the Commission to check this with the local authority's enforcement records and to consider it in assessing the risks to water.

Public consultation

Appendix A shows direct engagement was limited to about 342 houses within 1.5 km, with 42 households within 1 km spoken to directly. The August 2025 invitation went to 334 houses, and some letters were returned undelivered because they lacked a resident's name. Not every house received the newsletters, and some residents who asked for one-to-one meetings were not facilitated. The applicant has not explained why 1.5 km was chosen, although construction traffic and landscape effects reach well beyond it. The August sessions at Inch Community Centre were mostly pre-booked individual appointments, not an open forum on the whole proposal. Newsletter 2 said the layout was still being drafted, and residents were told photomontages would come with the application. Much of the engagement therefore took place before the public could see the proposal now before the Commission.

Cumulative effects

Cork County Council asked in Planning Ref. 25/6876 for a cumulative assessment of the proposed 800-acre solar farm and the permitted Lyrenacarriga Wind Farm. I understand that Planning Ref. 26/2133 did not adequately provide it, and that the 220kV substation was not properly taken into account. A 110kV substation has already been permitted (PA04.309121) about 4 km away. The two substations are proposed to share the R634 for construction traffic, so their traffic, noise, dust and road safety effects could overlap. East Cork and Waterford have already seen several large solar developments, a concentration disproportionate to most of the country. I am also concerned, from experience elsewhere, that solar projects expand beyond their original permissions. I ask that the substation be assessed cumulatively with all of this infrastructure, both spatially and over time.

Site location and alternatives

Schedule 6 of the Planning and Development Regulations 2001 requires an EIAR to describe the reasonable alternatives studied. I cannot find a comparison of sites along the 220kV route, and the site appears to have been chosen mainly because the landowner was willing. Such a choice is not a planning

rationale. The drainage work appears to have been done in dry summer conditions, although the area is known to be wet. I also cannot find any letter of support from EirGrid or ESB Networks for this location. The site also removes land that future generations could farm.

Conclusion

For these reasons I respectfully ask the Commission to refuse permission. If it is minded to proceed, I ask it to request further information on the matters above, in particular the archaeological investigation of the compound footprint, the wildlife surveys, the traffic and school safety assessment, the alternatives and the cumulative effects.

Is mise,

Jonathan Dignam