Margaret Keevers
Coolbagh
Clashmore
Co Waterford

2nd November 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 of the area, and I make this Observation on the substation application only. The solar farm and battery storage are a separate application. The substation and loop-in, however, are permanent. Section 6.3 of Appendix H states they will be handed to the network operator and not decommissioned, so they must be assessed on their own merits.

Public Consultation

The applicant relies on Appendix A, Summary of Engagement 2025, which concerns the wider Greenhills Renewable Energy Development. It records that Newsletter 1 went to about 342 houses within 1.5km, that 42 households within 1km were spoken to directly, and that the August invitation went to 334 houses. It also acknowledges that letters were returned undelivered by An Post because they did not name the resident. No reason is given for choosing 1.5km, yet a 220kV station, 18m masts and new towers, and the associated construction traffic, may be seen and felt well beyond that radius. The August sessions at Inch Community Centre were largely pre-booked individual appointments, with 36 face-to-face meetings in the first two days. That is not an open forum where the whole proposal can be presented and discussed. I am also aware that others requested one-to-one meetings and were not facilitated. Newsletter 2 said the layout was still being drafted and showed only a study area, and residents were told photomontages would follow with the application. Much of the engagement therefore preceded the information now before the Commission.

Archaeology

Appendix R assesses the wider site, and its avoidance measures are written for solar panels. The executive summary and page 3 propose preservation in situ of anomalies M1 to M4 using non-intrusive gabion or ballasted foundations. Those measures cannot apply to the substation. Drawing 300101185-DR-213 shows the compound formed by cut and fill, with 17,304 cubic metres of cut and 34,669 cubic metres of fill, to a finished level of 109.05m. A platform of that kind cannot sit on gabion baskets.

The sub-surface evidence is also incomplete. The walkover of 14-16 May 2025 saw only the surface.

Paragraph 3.15 of the geophysical survey (licence 26R0042, Appendix I) says it covered a significant portion of the site, not all of it, and the application does not state that the compound, tower bases or widened access sections were surveyed. Paragraphs 6.34 and 6.35 rely on monitoring during construction, with preservation in situ only "where feasible". On a platform that must be cut to level, that will rarely be feasible. Paragraph 3.14 records Cork County Council's comments of 10 February 2026 on the solar application, stating that an assessment of sub-surface archaeology was required before determination. The substation should meet the same standard. Finally, paragraph 4.15 describes the hillfort CO067-001001, 490m west of the site, as occupying a commanding position, yet the report contains no specific setting assessment of a permanent compound, lightning masts and new towers upon it.

Visual Impact

The LVIA uses GLVIA3 methodology, a 5km study area and 24 viewpoints, and it acknowledges that residents are highly sensitive receptors. Page 28 notes that several dwellings lie around the substation. Yet the analysis at viewpoints such as VP4 and VP5, which represent nearby dwellings, concentrates on panels, hedgerows and screening rather than on the substation. The substation comprises a compound of about 22,631.71 square metres, a 438 square metre control building, a 590 square metre IPP building, two transformers, a 2.6m fence, lighting, approximately 18m lightning masts and 37.5m lattice support structures. The reasoning that 3.4m panels will be screened by vegetation and landform cannot be transferred to structures of 18m and 37.5m. No dedicated residential visual assessment or ZTV analysis is provided for the nearest houses. The LVIA also relies on new planting that it accepts will be in an establishment phase for three years. The application should show views at completion, after three years and after ten years, including in winter.

Site Location

The EIA Directive 2014/52/EU, transposed through the Planning and Development Act 2000 and the 2001 Regulations including Schedule 6, requires an EIAR to describe the reasonable alternatives studied and the reasons for the option chosen. I could find no comparison of alternative substation sites along the 220kV route. The only apparent driver is landowner agreement, which is not an empirical siting criterion. The applicant's own material indicates significant effects on over 300 homes, and alternatives might have reduced that. I also could not find any letter of support from EirGrid for this location. The drainage work appears to have been undertaken in dry conditions, although the lands are known to suffer wetland conditions, and the transport material understates the unsuitability of the local road for heavy loads such as the two transformers of about 150 tonnes.

Emergency Risk and Fire

Section 4.3 lists two 220kV transformers, switchgear and a diesel generator and tank, and the site notice describes the transformers as oil-filled and bunded. Schedule 7 of the 2001 Regulations requires consideration of the risk of major accidents and disasters. Section 3.7.8 of the EIA Screening Report addresses construction accidents and hydrocarbon spills, and Table 4.1 rates the risk as "Low". Neither it, nor section 4.3, nor Appendix H assesses a fire at the transformers or the diesel tank. The oil volume is not stated. Drawing 300101185-DR-200 shows bunds "TBC at Detailed Design", a separator and soakaways, and does not show that firefighting water would be retained rather than passed to a soakaway.

Emergency access is similarly unaddressed. The access sought is the new entrance off the R634, shown on drawing 300101185-DR-100B. There is no fire appliance swept path from Site Access No. 1 to the transformer bays, no stated gate width and no turning assessment. Drawing 300101185-DR-210 does not demonstrate appliance passage, and Appendix M does not assess this route.

Conclusion

For these reasons, I respectfully ask the Commission to refuse permission. At a minimum, I ask that further information be requested on consultation, sub-surface archaeology and the hillfort setting, residential visual assessment of the substation, alternative sites, and fire and emergency access.

Is mise,

Margaret Keevers