Mary Donnelly
Newtown House
Youghal
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 resident living within 5km from the proposed development and our family farm is directly across the road from it, and I wish to make this Observation on the substation application. It concerns the substation only. The solar farm and battery storage are the subject of a separate application. However, the substation is permanent infrastructure that would remain in place even if the solar farm were decommissioned after 40 years. It must therefore be assessed on its own merits.

I. SITE LOCATION AND CONSIDERATION OF ALTERNATIVES

The Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended) transpose the EIA Directive 2014/52/EU. Together they require an EIAR to describe the reasonable alternatives studied by the applicant and to give the main reasons for the option chosen, taking account of environmental effects. Schedule 6 of the Regulations refers. The EPA guidelines on the information to be contained in EIARs (2022) expect options to be compared against clear and demonstrable criteria.

In my submission, the application does not meet that standard. I could find no side-by-side comparison of alternative substation sites along the 220kV route. The Blackwater SAC is referred to as a constraint, but no other alternatives appear to have been assessed. The main reason given for this location appears to be landowner agreement. A willing landowner is a practical consideration, but it cannot replace an objective, criteria-based comparison. The applicant has not set out and applied criteria such as environmental constraints, proximity of dwellings or access suitability to competing options.

The consequences are significant. The applicant's own engagement summary records approximately 342 houses within 1.5 km of the general site area. Other locations along the same route might have affected far fewer homes, but the Commission cannot know this because none were presented. I also note that the record of pre-application consultation with the Commission does not explain how alternatives were discussed.

Site conditions reinforce this concern. The drainage assessment (Appendix B) appears to rely on fieldwork carried out during dry summer conditions, whereas the site is known locally to experience wetland conditions. A realistic assessment, and any comparison with other sites, should reflect the least favourable season. The access appendices also appear to understate the unsuitability of the local road leading from the R634 (Youghal-Tallow Road) to the new entrance. That road is poorly suited to heavy goods vehicles, and it raises a real question about emergency vehicle access in wet conditions. Finally, no letter of support or confirmation from EirGrid or ESB Networks for this specific location appears to have been provided. A reasonable applicant would be expected to seek such confirmation.

II. LACK OF MEANINGFUL PUBLIC CONSULTATION

Appendix A, Summary of Engagement 2025, shows that direct engagement was geographically restricted. Newsletter 1 was delivered in February 2025 to approximately 342 houses within 1.5 km, and 42 households within 1 km were spoken to directly. In August 2025 invitations were posted to 334 houses within 1.5 km. The applicant acknowledges that some of these were returned undelivered by An Post because they did not carry a resident's name. Not all households therefore received them.

No explanation is given for choosing 1.5 km as the limit. The effects of a large 220kV substation, including landscape and visual effects, construction traffic and use of local roads, are not confined to a fixed radius. The number of newsletters issued is not the same as consultation with the full public potentially affected.

The form of engagement also matters. The August sessions at Inch Community Centre largely consisted of pre-booked individual appointments, with 36 face-to-face meetings, two virtual meetings and eight later appointments. Individual meetings have value, but they are not equivalent to an open forum where the whole proposal and its cumulative impacts can be presented and discussed collectively. Other residents asked for one-to-one meetings and were not facilitated.

The timing is equally important. Newsletter 2 stated that the site layout was still being drafted and that the material shown was a study area. After Newsletter 3, residents raised concerns about scale and visual effects and were told that photomontages would accompany the planning application. Much of the engagement therefore took place before the public could see the final layout, the environmental assessments or the photomontages now before the Commission. Consultation on a concept is not informed participation in the development actually submitted for consent. Residents have also made their concerns known through submissions, petitions and their own

public meetings, which suggests that the applicant's process did not meet the community's needs.

III. VISUAL IMPACT

The LVIA uses the GLVIA3 methodology, a 5 km study area and 24 viewpoints. It accepts that residents are highly sensitive receptors and that primary views from dwellings are important to residential amenity. At page 28 it states that several dwellings lie in the surrounds of the proposed substation, though none is immediately adjacent to its boundary. Despite this, it does not provide a dedicated residential visual assessment of the substation as seen from those homes.

The substation is a substantial installation. The LVIA describes a compound of approximately 22,631.71 m2, a 438 m2 control building, a 590 m2 IPP building, two 220kV transformers, outdoor electrical equipment, a 2.6 m perimeter fence, lighting on masts, and lightning protection masts of approximately 18 m. The documents also refer to lattice support structures of 37.5 m. Yet the viewpoint analysis is built mainly around the solar panels. VP5 is described as representative of views from local dwellings, but its discussion concerns panels, hedgerows and screening. VP4 follows the same pattern. Neither shows what residents would see of the substation and its tall structures.

The reasoning that panels no higher than 3.4 m will be screened by vegetation and landform cannot simply be transferred to masts of 18 m or 37.5 m. These structures may rise above hedgerows and tree lines that would hide the panels. This should be demonstrated through ZTV analysis and photomontages from the specific residential receptors concerned.

The LVIA also relies heavily on proposed planting, and it acknowledges a three-year establishment period. The Commission should be told what residents will see on completion, after three years and after ten years, and what they will see in winter when deciduous screening is bare. Without this, the residual effects cannot be reliably judged.

IV. YOUTH PERSPECTIVE AND NATURE

The substation is **permanent** infrastructure, and it is the young people of this area who it will impact in the long run. Our family farm is directly across the road from the site, and young people in farming families here hope to continue working the land and to raise their own families locally. A large industrial compound beside working farms affects how young people see their future in the area and whether they choose to stay. I could find no evidence in the engagement summary that the views of young people were sought. The same permanence applies to nature. The site is open farmland with hedgerows, field boundaries and ground that is known locally to be wet, and the Blackwater SAC (**a protected site 002170**) lies nearby. The existing area supports wildlife that local children grow up with. Replacing this habitat with hard standing, fencing and lit equipment would be a lasting loss. I ask the Commission to give weight

to these long-term effects on the next generation and on local biodiversity, and to consider whether the applicant has shown that they can be avoided or properly mitigated.

I recognise the importance of renewable energy and the need to move towards a more sustainable future. However, sustainability must also mean protecting our local environment, respecting the people who live here and carefully considering the lasting impact of major developments on rural communities.

V. CONCLUSION

For the reasons above, I respectfully ask the Commission to refuse permission. The application does not demonstrate an objective assessment of reasonable alternatives, public engagement was limited and took place before the full design was available, and the visual effects on nearby homes have not been properly shown.

At a minimum, I ask the Commission to request further information on the following:
- A comparative assessment of reasonable alternative sites along the 220kV route, using stated criteria
- Drainage and ground conditions assessed in the least favourable season
- A realistic assessment of road and emergency vehicle access
- Confirmation from EirGrid and ESB Networks regarding this location
- A dedicated residential visual assessment of the substation, including ZTV analysis and photomontages from nearby dwellings at completion, year 3, year 10 and in winter

Thank you for considering this Observation.

Is mise,

Mary Donnelly, Student.