Patrick and Mary O'Brien
Clonpriest
Youghal Cork

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,

We are residents who live more than 5 km from the proposed development. This observation concerns only the substation application: the 220 kV compound, the loop-in towers and the access shown in red on drawing 300101185-DR-100B. The solar farm and battery storage are a separate application. Because the station is to remain after the solar farm is decommissioned, we treat it as permanent.

I. ARCHAEOLOGY

The avoidance measures are written for a solar farm. Appendix R assesses the wider renewable energy site. Its executive summary and the mitigation list on page 3 rely on preservation in situ, using non-intrusive gabion or ballasted foundations and stand-off buffers, for the four geophysical anomalies M1 to M4 (fields 22, 58, 63 and 66). It then concludes that residual effects are neutral, imperceptible or not significant. Those measures do not fit this application. Drawing 300101185-DR-213 shows the compound formed by cut and fill, with a cut of 17,304 cubic metres and a fill of 34,649 cubic metres, to a finished level of 109.05 m cut into rising ground. A platform of that kind cannot sit on gabion baskets. The report's reliance on reversibility and decommissioning is also a solar point, since this is a permanent 220 kV station.

The survey is not shown to cover the compound. The walkover of 14-16 May 2025 saw only the surface, and paragraph 5.3 of Appendix R says nothing previously unknown was seen. The sub-surface evidence is the geophysical survey under licence 26R0042 (Appendix I). Its paragraph 3.15 says it covered a significant portion of the site, not all of it, and that fields in the south-western portion were left out because of rough ground. The survey also lists overhead lines, tracks, yards and streams as constraints. The applicant does not state that the compound, the tower bases or the sections of access to be widened lay inside the surveyed area.

Monitoring during construction comes too late for this platform. Paragraph 6.34 proposes archaeological monitoring of the substation, compound areas and access tracks. Paragraph 6.35 prefers preservation in situ only "where feasible". On a platform that must be cut to a finished level, it will not be feasible. The practical result of a monitoring condition is to record what the excavator uncovers and then build. The Framework and Principles for the Protection of the Archaeological Heritage seek to establish what is

present before a decision is made.

The same developer has already been held to a higher standard. Paragraph 3.14 of Appendix R quotes Cork County Council's comments of 10 February 2026 on the solar application. The Council said the archaeological assessment was inadequate and that sub-surface assessment was required so the application could be examined against the County Development Plan. Page 5 of Appendix I says the Council asked for this at pre-planning rather than pre-construction. That letter does not decide this case. It does show that buried archaeology must be known before a decision, and the part of the project involving the deepest ground disturbance should not be held to a lower standard than the panels.

The hillfort setting is described but not assessed. Paragraph 4.15 records a hillfort in Rath townland, CO067-001001, 490 m west of the site boundary, occupying a commanding position in the local landscape. Paragraphs 6.4 and 6.5 do not assess it. The setting assessment is built around protected structures and National Inventory of Architectural Heritage buildings, and leans on reversibility and hedgerow planting. It contains no specific assessment of the effect of a permanent compound, lightning masts and new towers on the setting of this monument.

II. NOISE AND VIBRATION

Appendix S is titled for the Greenhills Renewable Energy Park. Its section 1.1 covers solar construction, trenching, the substation and battery compound, and operation of all three. It is not an assessment of these works. The closest distances in Table 1.1, 5 m and 8 m, are distances to the energy park red line, not to the platform on drawing 300101185-DR-213. No distance from the compound or this access to any house is given.

The report's own test at section 1.2.5.1, taken from BS 5228, is 65 dB at a house for more than 10 days in any 15, or more than 40 days in six months. Section 5.5.6.1 of the Planning and Environmental Report puts these works at about 16 months, so the duration limb would be met if the level is. That level has not been calculated for this platform, this access or the haul to Site Access No. 1 on the R634. The 23 to 45 dB column in Table 1.28 is not that calculation.

The earthworks figures do not agree. The drawing summary gives a net fill of 17,345 cubic metres. The notes on the same drawing give 36,649 cubic metres, plus 9,490 cubic metres of capping stone not shown on the sections. Section 5.5.6.1 gives 25,013 cubic metres and says all excavated material will be reused, which cannot be reconciled with the drawing. On any figure, fill exceeds cut and material must be imported, with the stone as a separate import. That traffic, with the transformer deliveries, belongs to these works on this access and the R634. The notes on drawing 300101185-DR-100B placing an access track in the other application do not remove the access this application seeks.

III. LACK OF REGULATION AND THE EIA SCREENING

There is no EIAR. The Commission is relying on an EIA Screening Report, whose section 3.7.6 says construction noise will be temporary and operational noise is not expected to be significant. Section 3.7.5 treats excavated material as reused by joining the station to the battery compound. Under Directive 2011/92/EU as amended by Directive 2014/52/EU, the Commission is the competent authority. It must reach its own independent conclusion on screening, and should not simply adopt the applicant's documents. Where the applicant's material rests on assessments of a different project and unresolved figures, scientific doubt has not been excluded. Cumulative effects with the related solar application should also be considered.

We also note that a climate benefit does not justify a grant by itself. Section 15(1) of the Climate Action

and Low Carbon Development Act 2015 imposes a duty to act only so far as practicable. Landscape, heritage, amenity and the County Development Plan remain material, and the Council's own view of the related application is relevant to them.

IV. CONCLUSION

The archaeological, noise and screening material in this file was prepared for a different and reversible project. It does not assess a permanent station built on a 109.05 m cut and fill platform. We respectfully ask the Commission to refuse permission. At a minimum, we ask it to request further information, including:

- the surveyed extent of the geophysical work against the compound, tower bases and access
- a specific archaeological assessment of the cut and fill platform
- an assessment of the effect on the setting of CO067-001001
- a noise and vibration assessment of this compound, access and haul, with distances to the nearest houses
- reconciled earthworks and import volumes
- a fresh EIA screening determination

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Patrick and Mary O'Brien