Submitted via the An Coimisiún Pleanála online portal

Phil Chidlow
Ballydaniel,
Lackaroe,
Youghal,
Co. Cork
philchidlow@gmail.com
0863430775

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The Secretary, An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

RE: Planning Observation – Case File Reference VA04.324632
Applicant: Perigus Energy Ireland Midco Ltd
Development Description: Construction of a 220kV Air Insulated Substation, loop-in grid connection, and related works.
Location: Townlands of Ballyneague, Ballydaniel, Knocknagappagh, County Cork.

To Whom It May Concern,

I am writing to formally submit an observation regarding the above-referenced planning application lodged with An Coimisiún Pleanála on 08th September 2026. While acknowledging the importance of renewable energy infrastructure, I wish to raise several significant planning concerns regarding this development. I request that the Board fully considers the following valid, evidence-backed planning arguments during its assessment.

1. Archaeological Heritage Protection
The proposed development site is situated approximately 700 metres from Rath Fort, a site of significant local archaeological importance. Under the National Monuments Acts and Chapter 16 of the Cork County Development Plan, the protection of recorded monuments and their settings is a core planning objective. The construction and operational phases of a 220kV Air Insulated Substation introduce substantial risks of structural damage and environmental degradation due to low-frequency noise and heavy machinery vibrations. The fort has a number of souterrains leading away from the fort that could be permanently damaged due to heavy works nearby. A comprehensive, independent vibration and acoustic impact assessment must be conducted to guarantee that the structural integrity and setting of Rath Fort are not irreversibly compromised.

2. Hydrology and Flood Risk Management (Cronin's Bogs)
The site selected for this heavy industrial infrastructure is positioned on land known locally as "Cronin's Bogs." As a natural wetland and peatland area, this terrain serves as a vital local flood plain and carbon sink. Constructing a large-scale substation requires extensive

excavation, piling, and the introduction of widespread impermeable surfaces. This will fundamentally disrupt the local hydrological balance, drastically reducing the land's natural water retention capacity and significantly elevating the risk of downstream flooding. This directly contradicts the flood risk management guidelines set out in the Planning System and Flood Risk Management Guidelines for Planning Authorities.

3. Water Pollution and Public Health Risk
The subject land contains multiple natural springs that directly feed into the River Tourig catchment area. The River Tourig is a critical ecological corridor and a primary source feeding into the public drinking water supply for Youghal. The construction and operation of a 220kV substation present an unacceptable risk of ground and surface water contamination from hydrocarbon spills, heavy sediment runoff, and chemical leaks. Any contamination event at this location poses an immediate threat to public health and breaches the strict environmental quality standards mandated by the EU Water Framework Directive.

4. Deficiencies in Visual Impact Assessment
The Environmental Impact Assessment Report (EIAR) submitted by the applicant features 24 representative viewpoints to illustrate the visual impact of the co-located solar and substation developments. However, a critical evaluation reveals that many of these viewpoints deliberately omit or obscure the physical structures of the proposed 220kV substation and its associated loop-in lattice towers. This omission severely distorts the true visual impact on the local landscape. The Board cannot properly assess the visual disamenity of this large-scale industrial infrastructure without accurate, transparent, and fully rendered photomontages from all 24 established viewpoints.

5. Inappropriate Site Location and Access Restrictions
The proposed site is highly unsuited for a major infrastructural node. The geographic positioning isolates the substation behind approximately one mile of narrow, private, off-road tracks running directly through a proposed solar farm. This layout presents a highly restricted access route that is entirely inadequate for the continuous movement of heavy transport vehicles required during the construction and grid-connection phases. Part of the access route uses an underpass designed for the movement of livestock and not industrial machinery.

6. Depreciation of property values within the locality of the development.
The proximity of such a large industrial-scale development raises serious concerns regarding the devaluation of nearby homes. This represents a significant financial and emotional burden on residents who have invested their lives in this area and who had a reasonable expectation of remaining within a rural residential environment.

7. Emergency Response and Health and Safety Risks
The isolated positioning of the substation raises severe emergency response concerns. Accessing a high-voltage electrical facility via a single, one-mile off-road path routed through thousands of solar panels creates an unacceptable logistical hazard. In the event of a catastrophic electrical fire, chemical leak, or thermal event, emergency services (including local fire brigades) would face extreme difficulty gaining rapid, safe access to the site. This introduces a disproportionate risk to local health, safety, and environment.

8. Cumulative Impact with Existing Regional Infrastructure
The planning authority must assess this project not in isolation, but in tandem with existing and permitted energy infrastructure in the immediate vicinity. The Lyrenacarriga wind farm

substation and its associated Battery Energy Storage System (BESS) are located just 4 kilometres away. Introducing a second massive 220kV substation and grid connection creates an excessive industrial concentration within a traditionally rural landscape. The cumulative impacts regarding landscape character disruption, habitat fragmentation, and industrial noise levels have not been adequately addressed by the applicant.

9.Threat to Local Wildlife
Building a large power substation here will seriously harm our local wildlife, including foxes, badgers, bats, and birds of prey. The heavy construction equipment, digging, and ongoing noise will destroy the quiet natural areas these animals rely on to hunt and travel. Badgers and foxes risk being dug out of their homes or driven away entirely as hedges and fields are cleared. In addition, the new high-voltage wires and poles create a dangerous risk of injury or death for birds of prey flying through the area. The constant buzzing noise and bright security lights from the station will also confuse bats, ruining their ability to hunt for food at night. This countryside is a natural sanctuary, and turning it into an industrial site will permanently damage our local ecosystem.

10. Prematurity Pending Standardized Legislative Frameworks
The scale and technological specifications of this development are being proposed during a notable lack of comprehensive, updated national planning legislation tailored to large-scale co-located substations and battery systems. Proceeding with a development of this magnitude in the absence of robust national spatial guidelines is premature and risks setting a dangerous planning precedent for the region.

Conclusion
Given the severe risks to public drinking water, regional flood defense, archaeological heritage, local wildlife and emergency access, alongside the flawed visual data provided, I respectfully request that An Coimisiún Pleanála refuses planning permission for case file VA04.324632. Alternatively, a comprehensive request for Further Information must be issued to force the applicant to address these critical environmental and structural deficiencies.

This massive, industrial-scale development is entirely out of character for the rural community of Killeagh and Inch. Building a project of this size on land designated for farming will permanently change the open countryside. Furthermore, approving this substation sets a dangerous precedent, opening the door for future solar projects that will lead to the further industrialisation of our agricultural land.

Please keep me informed of any updates, reports, or final decisions regarding this application.

The prescribed fee for an observation on a strategic infrastructure application is enclosed: €50 paid via the online portal.

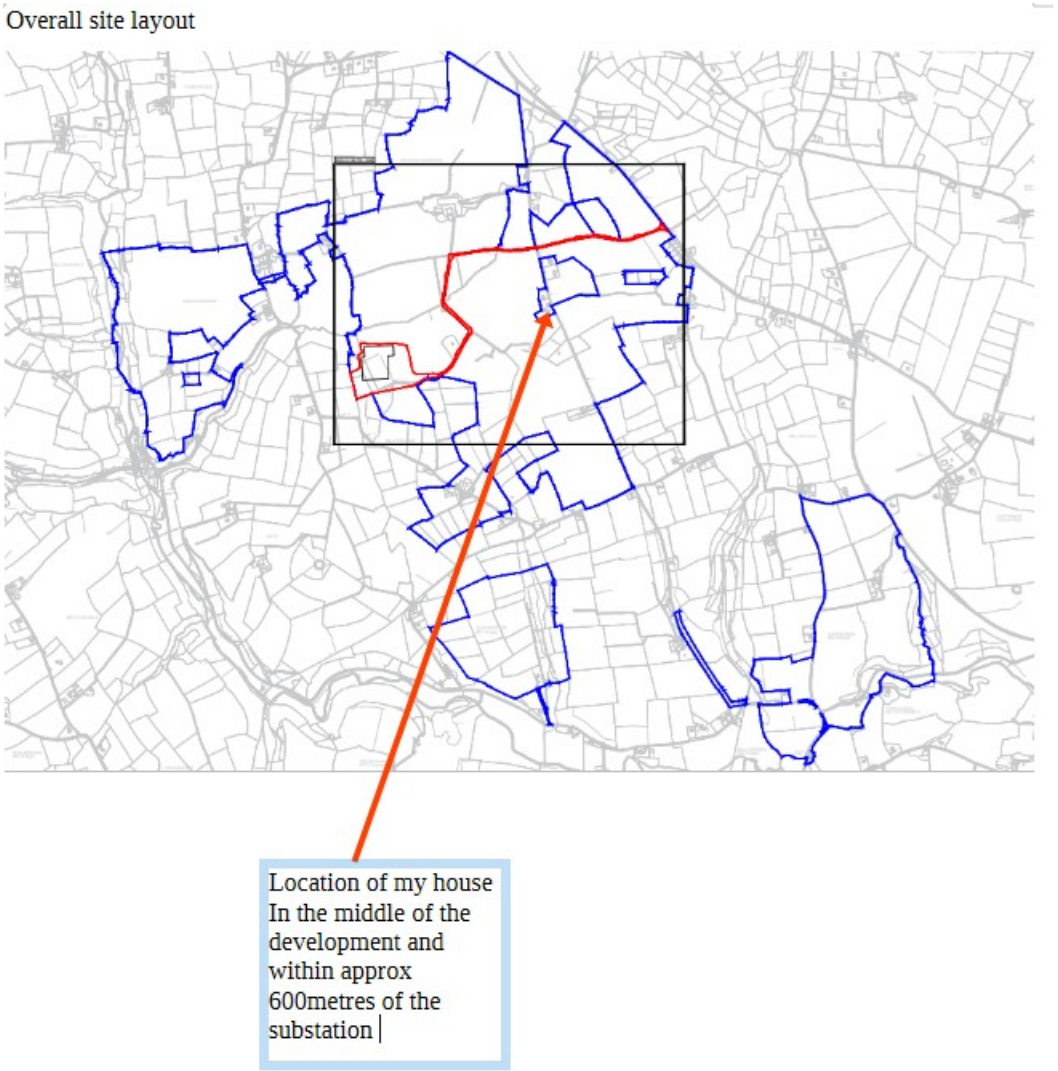
Yours sincerely,

Philip Chidlow

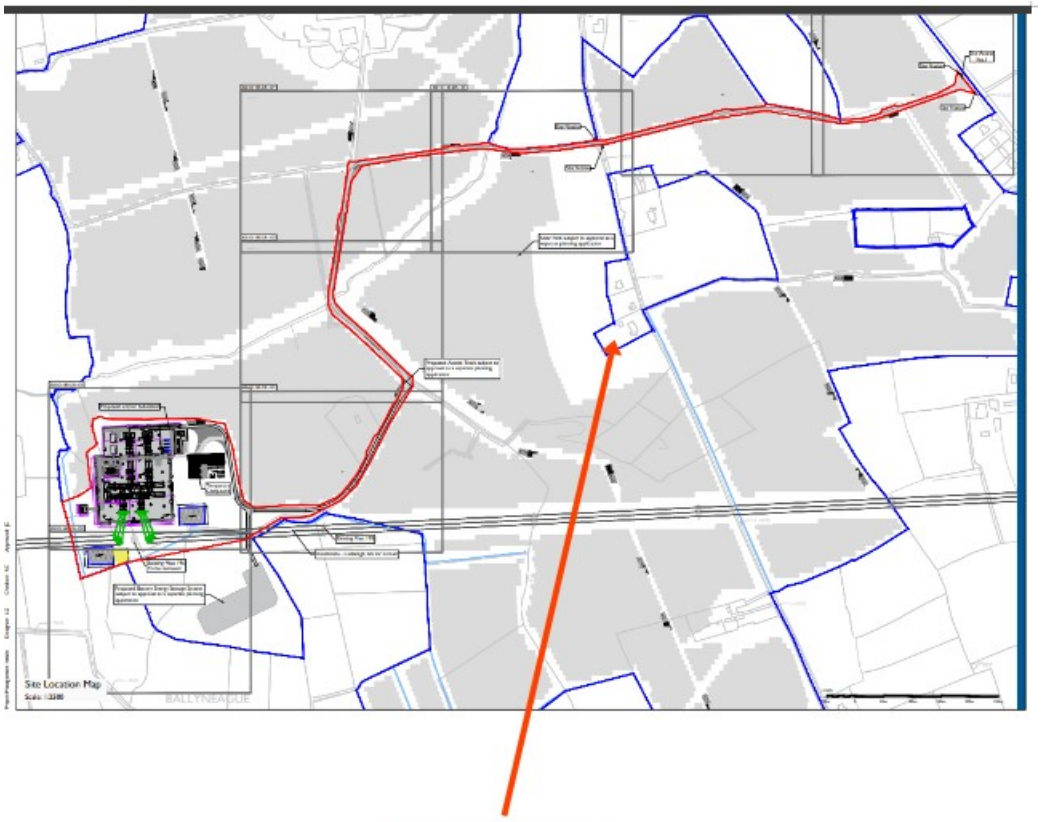


Supporting Pictures and Drawings

I have included supporting documentation with these observations, including a site map of the proposed development clearly identifying the location of my home within the centre of the application site. I have also submitted photographs taken from my home, illustrating the existing rural amenity and the approximate position of proposed infrastructure should this development proceed.



Map showing substation, access tracks and proximity to my house



Location of my house
Proposed substation will be approximately 600m away from house

Current View to South West from my House



Image showing view to South West from my house with Substation in proposed position

