Roger Kennedy
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Youghale

17th 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 local resident living between 1 and 5 km from the proposed site. This observation concerns only the substation application. I do not oppose renewable energy in principle. My concern is that permanent 220kV infrastructure is proposed on wet land within a catchment connected to a European site. My parents are among those who will live with the consequences.

**1. Hydrology, Flooding and Water Quality (my priority)**

Surface water from the site drains to the River Tourig and on to the Blackwater estuary. The River Blackwater (Cork/Waterford) SAC is a European site, and Atlantic salmon is among its qualifying interests. Water quality is therefore my main concern.

The applicant's Appendix N states that the substation footprint is about 1.8 hectares and that the effect on land occupied by the substation and access tracks will be "moderate, adverse and permanent". It records excavation of up to about 3.6 metres, combined substation and BESS cut and fill of about 25,013 cubic metres, and about 9,320 cubic metres of imported stone to cap the platform. These are major interventions in the soil and drainage regime.

Appendix N also confirms that the Tourig_020 and Glendine_010 watercourses beside the site have mapped indicative flooding, and that local knowledge indicates flooding within the same sub-basin. The applicant's own flood risk assessment calculates that a 1-in-100-year event would increase runoff by about 0.016 to 0.185 cubic metres per second, up to approximately 4.15 percent of the relevant micro-catchment. It accepts that, without mitigation, construction could cause flooding on site or downstream. Absence of a mapped flood zone under the platform does not mean absence of risk.

I also understand that some drainage investigations were carried out in dry summer conditions. They may not reflect the waterlogged ground that local people observe in winter. I ask the Commission to require winter-condition evidence and to apply Article 6(3) of the Habitats Directive strictly. Permission should not be granted unless the Commission can exclude, beyond reasonable scientific doubt, any adverse effect on the SAC from silt, hydrocarbons or altered flows.

**2. Site Selection and Alternatives**

Annex IV of the EIA Directive (2011/92/EU as amended) and Schedule 6 of the Planning and Development Regulations 2001 require the EIAR to describe the reasonable alternatives studied and the main reasons for the choice made, including a comparison of environmental effects. The EPA's 2022 EIAR guidelines say the same. I could find no clear, criteria-based comparison of alternative substation locations along the 220kV route. The choice appears to rest largely on landowner agreement, which is a commercial convenience and not a planning rationale.

The applicant's own documents indicate significant impact on over 300 homes. A comparison of alternatives might have shown lower residential impact. The access from the R634 and the local road network also appear unsuited to heavy goods vehicles and to emergency vehicle access in wet conditions. I have not seen any letter of support from EirGrid or ESB Networks for this particular location, and I ask the Commission to seek one.

**3. Archaeology and Setting**

Appendix R is an assessment of the wider renewable energy site. Its avoidance measures, such as gabion or ballasted foundations and stand-off buffers for anomalies M1 to M4, are designed for solar panels. They cannot apply to 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 gabions, and reliance on reversibility is irrelevant to a permanent station.

The May 2025 walkover (14-16 May) sees only the surface. The geophysical survey under licence 26R0042 covered "a significant portion" of the site, not all of it, and it excluded some south-western fields. The applicant does not state that the compound, the tower bases or the widened access sections lay within the surveyed area.

Paragraphs 6.34 and 6.35 of Appendix R rely on monitoring during construction, with preservation in situ "where feasible". Once a platform is approved and must be cut to level, preservation in situ will rarely be feasible. Cork County Council's comments of 10 February 2026, quoted at paragraph 3.14, said sub-surface assessment was needed before a decision on the solar application. The substation should not be held to a lower standard.

The hillfort in Rath townland (CO067-001001) lies 490 m west of the site boundary and is described as occupying a commanding position. Local concern also extends to Ardagh. Appendix R contains no specific assessment of the effect of a permanent compound, lightning masts and new towers on the setting of the hillfort.

**4. Regulatory Context**

There is little national guidance on utility-scale energy infrastructure, which makes the Commission's independent scrutiny more important. Section 15(1) of the Climate Action and Low Carbon Development Act 2015 requires relevant bodies to act "so far as practicable" in furtherance of climate objectives. It does not displace landscape, ecology, heritage, water and amenity considerations. The substation will also remain after the 40-year life of the solar farm. As competent authority, the Commission must carry out its own EIA and Appropriate Assessment and should not rely uncritically on the applicant's documents. I also note that Cork County Council has already treated two related applications as invalid, and the local planning authority's role under the County Development Plan deserves weight.

**5. Public Engagement**

In my view there was no meaningful local engagement on this proposal. Residents were not given a real opportunity to influence siting or design.

**Conclusion**

For these reasons, I respectfully ask the Commission to refuse permission. At a minimum, I ask the Commission to request further information on the following:
- winter-condition drainage and flood evidence, with a site-specific downstream assessment
- a full comparison of alternative substation sites
- a sub-surface archaeological survey covering the compound, towers and access, and a setting assessment for the Rath hillfort

Thank you for considering this observation.

**Is mise,**

**Roger Kennedy**