Sean & Helen O Mahony
Ballinteosig
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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,

We are residents living between 1 and 5 km from the proposed development, and we make this Observation on the substation application only. We are not opposed to necessary grid investment. Our concern is that permanent high voltage infrastructure is proposed on productive farmland, supported by documents that do not adequately assess its effects. The substation is to be permanent and will remain if the solar farm, which is a separate application, is decommissioned after 40 years. It must therefore be assessed on its own merits.

**1. Visual Impact**

The LVIA uses GLVIA3 methodology, a 5 km study area and 24 viewpoints. It accepts that residential receptors are highly sensitive and notes at page 28 that several dwellings lie in the surrounds of the substation. However, it contains no dedicated residential visual assessment of the substation. Where houses are discussed, for example at VP4 and VP5, the analysis concerns solar panels, hedgerows and screening rather than the substation.

The substation includes a 2.6 m perimeter fence, a 438 m2 control building, a 590 m2 IPP building, two 220 kV transformers, lighting masts and lightning protection masts of about 18 m, together with loop-in support structures of about 37.5 m. The LVIA reasons that panels no higher than 3.4 m will be screened by vegetation and landform. That reasoning cannot be transferred to structures of 18 m and 37.5 m, which may rise above hedgerows. No ZTV analysis or photomontage from the nearest homes shows otherwise. The LVIA also relies on new planting that it accepts will be in an establishment phase for three years. The Commission should require views from the nearest dwellings at completion, at year 3, at year 10 and in winter. An industrial character in a predominantly agricultural landscape of open countryside and field pattern has not been properly tested.

**2. Cumulative Effect**

Cork County Council, in Planning Ref. 25/6876, requested a cumulative assessment of the solar farm and the permitted Lyrenacarriga Wind Farm. We understand the later submission under Planning Ref.

26/2133 did not adequately provide it, and did not properly take this 220kV substation into account. A 110kV substation permitted under PA04.309121 lies about 4 km away. Both substations are proposed to use the R634 for construction traffic. The combined effects of heavy goods vehicles, abnormal loads, noise, dust and road safety over potentially overlapping periods, and the combined landscape effects of two substations, a wind farm and a solar farm, must be assessed spatially and temporally. Separate applications should not prevent that.

**3. Hydrology and Flooding**

Appendix N describes the effect on land occupied by the substation and new and upgraded access tracks as "moderate, adverse and permanent". It records a substation footprint of about 1.8 hectares, excavation up to about 3.6 m, a combined substation and BESS cut and fill of about 25,013 m3 and about 9,320 m3 of imported stone. The site is outside mapped flood zones, but Appendix N accepts that the adjoining Tourig_020 and Glendine_010 watercourses have mapped flooding and that local knowledge indicates flooding within the same sub-basin. Its Flood Risk Assessment calculates a 1-in-100-year runoff increase of about 0.016 to 0.185 m3/s, up to 4.15 percent of the relevant micro-catchment. It also accepts that poor drainage could create preferential pathways, erosion and downstream flooding. Local experience is that this ground is frequently wet and waterlogged. A mapped flood zone elsewhere is not proof of no risk. The applicant should provide site-specific evidence, including winter conditions, that downstream flows, erosion and habitats will not be worsened.

**4. Noise and Vibration**

Appendix S is the assessment for the Greenhills Renewable Energy Park as a whole. It is not an assessment of this compound, its access or the haul route to Site Access No. 1 on the R634 shown on drawing 300101185-DR-100B. Its closest distances, 5 m and 8 m, are to the energy park boundary, and it gives no distance from the compound or access to any house. The BS 5228 test it adopts is 65 dB at a dwelling for more than 10 days in any 15, or more than 40 days in six months. The Planning and Environmental Report puts the substation works at about 16 months, so the duration limb would be met if the level is. That level has not been calculated for these works.

The fill figures are also inconsistent. Drawing 300101185-DR-213 shows a cut of 17,304 m3 and a fill of 34,649 m3, its notes give 36,649 m3 plus 9,490 m3 of capping stone, and the Planning and Environmental Report gives 25,013 m3 with all material reused. On any of these figures material must be imported, with traffic on the R634. There is no EIAR, and the effects on hedgerows, field boundaries and wildlife, including the deer in the area, are not assessed for this development.

**5. Location and Alternatives**

We cannot find a comparison of reasonable alternative sites along the 220kV route. The site appears to have been chosen largely on landowner availability, without clear criteria. The applicant's documents indicate significant impact on over 300 homes, and alternatives might have reduced that. Schedule 6 of the Planning and Development Regulations 2001, as amended, which implements Directive 2011/92/EU as amended by 2014/52/EU, requires a description of reasonable alternatives studied and the reasons for the choice. We are not aware of any letter of support from EirGrid for this location. The access road is unsuited to heavy goods vehicles and to emergency vehicles in wet conditions, and the drainage work appears to rely on dry-season observation. Nearby homes also face loss of privacy, loss of a peaceful rural setting and a long-term effect on property values.

**6. Regulatory Context**

The Commission is the competent authority under the EIA Directive and must be satisfied that cumulative effects and scientific doubt are fully addressed before any decision, rather than relying on the applicant's own conclusions. Section 15(1) of the Climate Action and Low Carbon Development Act 2015 requires the Commission to act only insofar as practicable, so climate objectives do not remove the need to weigh landscape, agriculture, amenity and infrastructure constraints. With limited national guidance on utility scale energy projects, the permanent nature of this station makes careful scrutiny all the more necessary.

**7. Conclusion**

We respectfully ask the Commission to refuse permission. At a minimum, we ask it to seek further information on a residential visual assessment of the substation and masts, a full cumulative assessment, a site-specific winter hydrological assessment, a noise and vibration assessment of these works and their access, reconciled earthworks volumes, and a documented comparison of reasonable alternatives.

Thank you for considering this Observation.

**Is mise,**

**Sean & Helen O Mahony**