Sean De Paor
Knocknagappagh
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13th 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 between 300 metres from the proposed substation, and I make this observation on the substation application only. The solar farm and battery storage are a separate application. However, the substation and loop-in are sought permanently, to be handed to EirGrid, and would remain if the solar farm were decommissioned after 40 years. They must therefore be assessed as a permanent development in their own right.

1. Noise and Vibration

My concern is a constant hum around our homes. The noise assessment on file, Appendix S, is titled for the Greenhills Renewable Energy Park and covers the solar farm, the battery compound and the substation together. Table 1.1 gives distances of 5 m and 8 m to the energy park boundary, not to the platform on drawing 300101185-DR-213. No distance is given from the compound, or from Site Access No. 1, to any house. Chapter 15 of the Planning and Environmental Report and section 3.7.6 of the EIA Screening Report repeat that operational noise is not significant, and there is no EIAR. A permanent station with two transformers requires its own operational assessment at the nearest dwellings, including tonal and low frequency character against background levels, for example in accordance with BS 4142.

Construction is also unassessed. Section 5.5.6.1 gives about 16 months of works. The BS 5228 test at section 1.2.5.1 of Appendix S (65 dB at a house for more than 40 days in six months) would therefore be met on duration if the level is reached, yet no level has been calculated for this platform, this access or the haul route. The 23 to 45 dB column in Table 1.28 is not that calculation. The fill volumes are also inconsistent. Drawing DR-213 shows a cut of 17,304 m3 and a fill of over 34,000 m3, with 9,490 m3 of capping stone, while section 5.5.6.1 gives 25,013 m3 and says all excavated material will be reused. The imported material means heavy traffic on the R634 that has not been quantified.

2. Archaeology

This is a landscape of high archaeological value. The geophysical studies referred to under Cork County Council reference 26/2133 have already revealed new finds, and further discoveries are likely when testing is complete. Appendix R records a hillfort at Rath, CO067-001001, 490 m west of the site boundary, and Ardagh church and graveyard are close by. Appendix R does not specifically assess the effect of a permanent compound, lightning masts and new towers on the setting of the hillfort.

The avoidance measures in Appendix R for anomalies M1 to M4, namely gabion or ballasted foundations and stand-off buffers, are solar measures. Drawing DR-213 shows the compound formed by cut and fill to a finished level of 109.05 m, and a platform of that kind cannot sit on gabions. The geophysical survey under licence 26R0042 covered only a significant portion of the site (paragraph 3.15), and south-western fields were omitted. The applicant does not state that the compound, the tower bases or the access were within the surveyed area. The walkover of 14-16 May 2025 examined the surface only.

Monitoring under paragraphs 6.34 and 6.35, with preservation in situ only "where feasible", comes too late for a platform that must be cut to level. Cork County Council's comments of 10 February 2026, quoted at paragraph 3.14, said that sub-surface assessment was required before the solar application could be examined. The same standard should apply to the substation. Given the National Monuments Acts, buried archaeology should be established before a decision, not after.

3. Visual Impact

This is an area of scenic beauty, and the substation would be a permanent feature on our horizon. The LVIA uses GLVIA3 and 24 viewpoints and accepts that residents are highly sensitive receptors. It acknowledges at page 28 that several dwellings surround the substation. Yet its analysis centres on the solar panels. Viewpoints VP4 and VP5 represent nearby homes, but their discussion concerns panels, hedgerows and screening, not the substation.

The compound covers about 22,631 m2 and includes a 438 m2 control building, a 590 m2 IPP building, two transformers, lighting, a 2.6 m fence, lightning masts of about 18 m and lattice structures of about 37.5 m. The reasoning that 3.4 m panels will be screened by hedgerows cannot be transferred to structures of that height. No residential visual assessment or ZTV analysis shows what the nearest houses will see. The LVIA also relies on planting with a three-year establishment period. It does not show the view at construction, after three years, after ten years, or in winter when vegetation is bare.

4. Emergency Risk and Fire

The station includes two oil-filled transformers and a diesel generator and tank. Section 3.7.8 of the EIA Screening Report and Table 4.1 rate the risk of major accidents as low, but neither assesses a fire at the transformers or the diesel tank. Schedule 7 of the Planning and Development Regulations 2001, as amended, requires consideration of the risk of major accidents and disasters. Drawing DR-200 states that bunds are "TBC at Detailed Design". The oil volume is not stated, and nothing shows that bunds would retain oil together with firefighting water rather than pass it through the separator to a soakaway.

Access is a further concern. The only access applied for is the red route on drawing DR-100B to Site Access No. 1 on the R634. The application contains no fire-appliance swept path, gate width or turning assessment. Appendix M is the Greenhills traffic assessment and does not assess this route, despite

transformer deliveries of about 150 tonnes. The roads around the site are not suited to heavy goods vehicles. I could not find any emergency plan for the safe evacuation of residents, livestock and possessions if an incident occurred.

5. Conclusion

The application relies on documents prepared for a different, reversible development, while the substation is permanent and its effects on nearby homes, archaeology, landscape and safety are not assessed. I respectfully ask the Commission to refuse permission. At a minimum, I ask that it request further information, including a station-specific noise assessment with distances to houses, a full sub-surface archaeological assessment of the compound, towers and access, a residential visual assessment with photomontages of the masts, and a fire and emergency response plan with bund details, swept paths and evacuation arrangements.

Is mise,

Sean dePaor