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Co Cork

3 November 2026

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

Dear Sir / Madam,

RE: Observation on Strategic Infrastructure Application number: 324632
Applicant: Perigus Energy Ireland Midco Ltd
Description of Development: a 10-year planning permission for the development of a solar farm with an operational life of 40 years.
Location: Knocknagappagh, Barnaviddane, Ballyneague, Ballydaniel, Youghalpark, Ballydaheen and Cornaveigh in County Cork

Dear Sir/Madam,

We are writing to formally submit our observations and objections regarding the above-mentioned strategic infrastructure application. Our detailed concerns are set out below.

1.0 Procedural Flaws and Incomplete Application

1.1 Omission of a Mandatory Environmental Impact Assessment (EIA)

The applicant's submission relies on an EIA screening report that asserts no significant environmental impacts will arise, depending heavily on proposed mitigation measures to justify skipping a full EIA. This approach contradicts established EIA directives. While solar farms are not explicitly itemized in every annex, EU guidance confirms that industrial-scale photovoltaic installations fall under Annex II.[1]

[11] https://op.europa.eu/en/publication-detail/-/publication/e7f9c73c-86ba-11ef-a67d-01aa75ed71a1/language-en.

Furthermore, the project triggers mandatory thresholds across multiple distinct categories:

- **Access Roads**: The scheme involves 5,135 metres of new access tracks alongside 7,115 metres of track upgrades. Under Schedule 5 (Part 2, Class 10(dd)) of the Planning and Development Regulations, private roads exceeding 2,000 metres require a mandatory EIA—a statutory requirement omitted from the applicant's legislative review.
- **Drainage Infrastructure:** A network of permanent drains, soakaways, and silt ponds will impact the entire 323-hectare site. Land drainage works on agricultural land exceeding 50 hectares trigger a mandatory EIA.
- **Earthworks and Recontouring**: The Greenhills Energy Station substation and Battery Energy Storage System (BESS) occupy 4.7 hectares, involving extensive cut (17,304 m2) and fill (36,649 m2) volumes. Permanent fixtures such as 54 inverter hardstandings/pads (15,660 m2) and cable trenching (2,070 m2) push the total permanently altered footprint past the 5-hectare threshold for mandatory assessment.

Because multiple statutory thresholds are crossed, an Environmental Impact Assessment Report (EIAR) is legally required. In its absence, An Coimisiún Pleanála lacks the necessary data to make an informed determination, meaning the precautionary principle must apply and the application should be refused.

1.2 Inadequate Archaeological Evaluations

Cork County Council previously deemed the application incomplete due to an inadequate archaeological assessment, noting that sub-surface evaluations are a baseline requirement. Although a geophysical survey area was agreed upon, the developer subsequently omitted approximately 42.85 hectares due to crop heights and "unsuitable ground conditions". Crucially, the omitted zones include the proposed substation footprint. Positioned close to the Rath Ring Fort and slated for massive ground recontouring, this is precisely where subterranean data is most critical.



Photo 6: View of surviving vernacular house (13) and approximate location of Barnaviddane 19th century settlement cluster, looking north-east.

Additionally, proposed mitigation relies on buffer zones around recorded monuments like the vernacular house structure (CO056-006). However, required sightlines overlap directly with this structure and active haul routes, rendering the proposed traffic management and buffer protections unworkable.



1.3 Flawed Noise Impact Assessments/Noise Mapping Errors:

The Noise and Vibration Impact Assessment maps misplace the actual locations of the substation and BESS, positioning them in an area of lower modeled noise near Carriganassa rather than their true site. Because all associated conclusions rely on erroneous geographic data, the application fails to provide valid information for statutory evaluation.

1.4 Flawed Visual Impact Assessments

Landscape and Visual Deficits: Despite the region being designated as an area of High Landscape Sensitivity in the Cork County Development Plan—and the proximity of approved 150-metre wind turbines—the cumulative visual assessment lacks analytical evidence, ZTV mapping, or cumulative photomontages.

1.5 Procedural Conclusion

Key baseline data is missing, erroneous, or incomplete. Under Irish and EU case law, the Board cannot lawfully grant approval without this foundational information, requiring the application to be rejected or paused for substantial further data.

2.0 Substantive Grounds for Refusal

2.1 Severe Flood Risk and Hydrological Pressures

The applicant's environmental documentation classifies the site as Flood Zone C with "no records or reports of flooding on-site". Yet, this locality suffered severe flooding during Storm Babet in 2023, causing extensive damage to local bridges and roadways near the proposed substation infrastructure.

While the developer claims runoff will remain unaltered, independent studies on large solar arrays indicate that panel cover increases concentrated surface water runoff volumes. Under national guidelines, an electrical substation and BESS facility constitute "highly vulnerable development," which must avoid flood-prone zones. The applicant has failed to satisfy the required "justification test" for placing critical infrastructure in a vulnerable catchment.

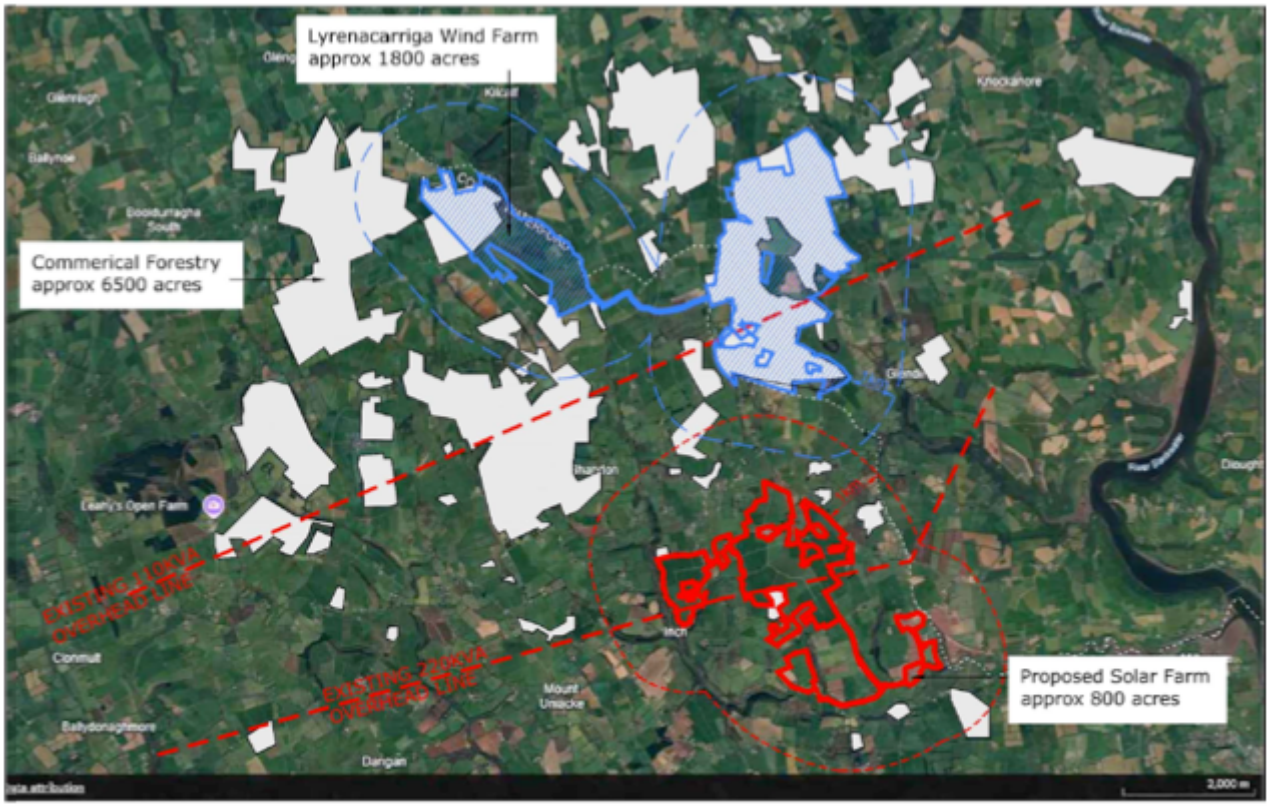
2.2 Incompatible Industrial Scale and Visual Overbearance

The sheer magnitude of this proposal would fundamentally transform the rural character of the Inch and Killeagh communities into an industrial landscape. Deploying monolithic blocks of solar arrays across steep slopes and prominent ridge lines creates an obtrusive, highly visible industrial feature that is entirely out of scale with the surrounding countryside.

2.3 Cumulative Renewable Energy Development Burden

This area in East Cork/West Waterford already bears a disproportionate burden of renewable energy infrastructure including Commercial Forestry, Lyrenacarriga Wind Farm and the now proposed Greenhills Solar Farm. This is an unsustainable clustering of developments within a limited geographic area. The proposed 800-acre solar farm, which would be the largest in Ireland, is located within approximately 1.4 km of permitted wind turbines at the townland of Ballydaniel (Lyrenacarriga), creating an unprecedented concentration of energy infrastructure.

The existing 6,500 acres of commercial forests are also located in close proximity to the proposed site. This represents one of the largest forestry concentrations in the country and already dominates land use in the area. Commercial forestry is a monoculture and does not equate to high biodiversity. Combined with large-scale solar and wind developments, Inch risks being overburdened as a carbon sink and industrial landscape rather than a balanced rural environment.



Two high-voltage power lines (110 kV and 220 kV) already run within approximately 2 km of each other, indicating that the area is already heavily utilised for national energy transmission.

This cumulative effect represents a disproportionate regional burden. Renewable energy targets must be met through fair and balanced regional distribution, not by overloading one community.

2.3 Unmitigated Fire Safety and Water Contamination Risks

BESS installations carry complex hazards, including thermal runaway, toxic gas releases, and severe fire risks. The site is remote, served by narrow, single-lane agricultural tracks that may be blocked by perimeter security fencing, hindering emergency response units. Youghal's nearest fire station is 14 km away and equipped with only two engines. Furthermore, the River Tourig—a vital drinking water source for Youghal—lies just 1.2 km downhill. The application contains no emergency containment strategy to prevent toxic firewater runoff from entering local watercourses and threatening public health or local livestock.

2.4 Ecological Impacts on Hydrologically Linked Waterways

The substation location is surrounded by watercourses draining directly into the River Tourig, which features direct hydrological links to the Blackwater Special Area of Conservation (SAC). Construction and operational phases threaten aquatic health through siltation and unassessed impacts on aquatic invertebrates (such as mayflies), which form a crucial food source for protected species like Atlantic salmon and white-clawed crayfish. These ecological risks were overlooked in the applicant's Appropriate Assessment (AA) screening.

Conclusion

We respectfully urge An Coimisiún Pleanála to deem this application invalid due to the omission of vital statutory assessments and incorrect baseline data.

Should the application proceed to full evaluation, We request that planning permission be refused on the following grounds:

- The overbearing industrial scale and inappropriate siting within a sensitive rural landscape.
- Unaddressed flood risks and run-off vulnerabilities associated with highly vulnerable infrastructure.
- Unmitigated fire safety risks and potential contamination hazards to public drinking water sources and the Blackwater SAC.
- Unworkable traffic and safety constraints, including inadequate sightlines and conflicting buffer zones near recorded monuments.

Yours sincerely,

Tom and Agnes Fitzgerald