Trish & Seán McCarthy
Inis Bhroin,
Ballydaniel,
Youghal,
Co. Cork
P36 WY04

01/11/2026

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 wish to formally object to the proposed development of the Greenhills 220kV Substation and associated infrastructure at Ballydaniel, County Cork.

We are residents living in close proximity to the proposed development, within an established rural residential setting. We have serious concerns regarding the suitability of this location for a development of this scale and nature, and the potential effects on our home, residential amenity and the surrounding environment.

We ask the Commission to consider the following grounds of objection:

1. Suitability of the Site and Proximity to Existing Homes

Our home forms part of an established rural residential cluster in Ballydaniel. This is not an unoccupied or isolated landscape. It is an area where people have established homes and where the existing rural character and residential amenity are important features of the receiving environment.

The proposed substation would introduce a substantial concentration of electrical infrastructure into this setting. The development includes a large compound, control buildings, transformers, electrical equipment, security fencing, lighting and associated infrastructure. The combined scale and nature of these elements would represent a significant change to the immediate surrounding and the existing rural environment.

The acceptability of a development of this nature cannot be considered solely by reference to whether the infrastructure can technically be accommodated on the site. Its relationship with neighbouring homes, the existing landscape and the established pattern of rural residential development must also be considered.

The application does not adequately demonstrate why this specific location is the most appropriate for infrastructure of this scale and nature. We ask the Commission to examine the applicant's site selection process, including whether alternative locations or layouts were considered and whether the proximity of existing homes and the established residential character of the area were given sufficient weight.

If alternative locations or layouts could have reduced the impact on existing residents, this should be clearly addressed. The availability of land or the technical convenience of a particular connection point should not, in itself, determine the acceptability of a site where people already live in close proximity.

We believe the scale and industrial character of the proposed substation are difficult to reconcile with the existing residential environment and that the potential impact on neighbouring households has not been adequately addressed.

2. Scale, Design and Industrial Character of the Development

The proposed substation is a substantial development. The Landscape and Visual Impact Assessment describes a compound of approximately 22,631.71m^2, including a 438m^2 substation control building, a 590m^2 IPP building, two 220kV transformers, outdoor electrical equipment and associated access infrastructure.

The compound is to be enclosed by approximately 2.6m-high palisade fencing. The proposal also includes lightning protection masts approximately 18m high, lighting infrastructure and a telecommunications structure identified in the project documentation at approximately 36m to 37.5m in height.

These are significant built and engineered structures in a rural landscape. Their scale, height and utilitarian appearance are materially different from the existing agricultural and residential character of the area. The substation is not a minor ancillary structure. It is a large, permanent electrical installation which will remain in place for the operational lifetime of the development. Its visual and environmental presence should be assessed accordingly.

There is an apparent inconsistency in the documentation regarding the height of the telecommunications structure. The Landscape and Visual Impact Assessment refers to approximately 37.5m, while the relevant drawing appears to identify a height of 36m. The correct height should be clarified, and the visual assessment should be based on the accurate dimensions.

We are concerned that the assessment of the development does not adequately convey what the permanent presence of this infrastructure will mean for residents living in its immediate surroundings.

3. Landscape and Visual Impact

The visual impact must be considered collectively rather than assessing the buildings, towers, masts and overhead infrastructure separately. The combined presence of these structures has the potential to create a substantial industrial feature within an established rural landscape.

The Landscape and Visual Impact Assessment includes VP8, a representative public road viewpoint on the L7829 at Ballydaniel, in the vicinity of our home. However, this is not a viewpoint from our property and does not represent the views from our home or the private residential spaces in which we spend our daily lives.

No photomontage has been provided from our own home. The visual material includes views from a neighbouring property and views looking up and down the public road. While these may provide an indication of the wider landscape, they do not adequately demonstrate how the proposed development will appear from our own property or the effect it will have on our immediate residential outlook.

The views from a person's home, garden and everyday residential surroundings are fundamentally different from a passing view from a public road. We do not believe that the submitted visual material provides a sufficiently accurate representation of the impact on our household.

We ask the Commission to ensure that the actual views from our property and the surrounding residential cluster are properly considered, rather than relying on representative viewpoints which do not adequately reflect the experience of the residents most directly affected.

The assessment should take account of the height of the proposed structures, the elevated nature of parts of the site, the proposed cut and fill and the permanent industrial appearance of the compound. The overhead grid connection infrastructure, including towers, masts and associated structures, should be considered as part of the overall visual impact rather than in isolation from the substation itself.

The proposed landscaping and screening measures should not be treated as a complete solution to these concerns. We are concerned about the reliance on existing vegetation and proposed planting as mitigation. New planting takes time to establish, is subject to seasonal change and cannot be assumed to screen all structures, particularly taller equipment and masts. Its effectiveness will also depend on its location, maturity, maintenance and long-term survival. The effectiveness of proposed screening should not be overstated.

We also wish to raise concerns about the proposed woodland planting and its potential impact on our home. Our house was architecturally designed and carefully oriented to maximise natural daylight, views and solar gain at different times of the day and throughout the year. Large areas of glazing were incorporated into the design to make the most of natural light and passive solar heating, contributing to the comfort and energy efficiency of our home.

The introduction of substantial woodland planting in the immediate surroundings, particularly planting proposed opposite our property, has the potential to compromise these design features. As trees mature, they may restrict sunlight, reduce natural light entering the house and affect the solar gain on which the design of our home was based. This is a separate and significant residential amenity concern which should not be overlooked simply by describing woodland planting as a visual mitigation measure.

The development also includes security fencing, CCTV and lighting infrastructure around the compound. The application should demonstrate how lighting will be controlled, including its height, direction, intensity and operating hours, to prevent unnecessary illumination and light spill beyond the site boundary. The positioning and operation of CCTV and security infrastructure should also be considered in the context of neighbouring homes and residential privacy. These measures should provide only what is necessary for safety and security, without unnecessarily affecting the character and enjoyment of nearby homes and gardens, particularly during hours of darkness.

Finally, the proposed development must be considered alongside the wider Greenhills solar farm and associated infrastructure. The cumulative visual effect of the substation, solar infrastructure, towers, masts and proposed planting has the potential to substantially change the character of the rural landscape and the outlook of nearby residents.

4. Impact on Vulnerable Residents and the Residential Environment

We wish to draw particular attention to the potential impact of the proposed development on a vulnerable child residing in our home.

Our son has diagnosed Autism Spectrum Disorder and ADHD. His conditions affect his sensory processing, emotional regulation and ability to manage unexpected changes and disruption. He can be particularly sensitive to noise, unfamiliar activity and changes to his established environment and daily routine.

The family home and its immediate surroundings provide an important source of security, familiarity and stability. The proposed development has the potential to significantly alter this environment, both during its construction and throughout its operational lifetime.

The anticipated construction period, with associated machinery, heavy vehicles, noise, vibration and ongoing activity, could create a prolonged period of disruption in the immediate vicinity of our home.

The introduction of a substantial electricity substation and associated infrastructure into an established rural residential setting in such close proximity to our home would also bring a permanent change to the environment in which he lives.

For a child with additional needs, this type of sustained and unpredictable disturbance in his home environment may be particularly difficult to manage. It could increase

anxiety and sensory distress, affect his ability to regulate, disrupt sleep and undermine the routines that are important to his daily wellbeing.

This is not simply a matter of temporary inconvenience. The construction period is expected to be prolonged, and the development would introduce a permanent change to the environment surrounding our home. The combined effects of construction disturbance and the long-term presence of substantial electrical infrastructure could have a disproportionate impact on his wellbeing, sense of security, sleep, and ability to regulate.

We recognise that planning assessments necessarily apply general environmental standards and criteria. However, compliance with standard noise limits or other general thresholds does not, in itself, demonstrate that the development will have no significant effect on residents with particular vulnerabilities or additional needs.

The particular circumstances of vulnerable residents living in close proximity to the proposed development are relevant to the assessment of residential amenity and should not be overlooked. The potential effects on our son should not be dismissed simply because they may be more difficult to quantify using conventional environmental assessment criteria.

We further submit that the needs and circumstances of vulnerable residents, particularly children, must be given meaningful consideration as part of the assessment of population, human health and residential amenity. An assessment based solely on general environmental thresholds may not adequately identify or address the effects experienced by individuals whose additional needs make them particularly sensitive to prolonged noise, disruption and changes to their living environment.

The Commission is therefore asked to consider not only whether the proposed development meets general environmental standards, but also whether the assessment has properly identified and evaluated its potential effects on vulnerable residents living in close proximity to the site. In our circumstances, this includes the potential impact on a child with additional needs whose wellbeing and ability to feel secure at home are closely linked to a familiar, stable and predictable environment.

These circumstances should be given meaningful consideration as part of the overall assessment of the suitability of the proposed location and the adequacy of the proposed mitigation measures.

5. Noise, Vibration and Construction Disturbance

Our home is situated in a rural residential setting where we currently enjoy a relatively quiet and peaceful environment. The introduction of a substantial electrical substation and associated infrastructure, together with the construction activity required to deliver it, has the potential to fundamentally change that environment.

The proposed development is expected to involve an extended construction period. Noise and vibration from machinery, excavation, construction works and the movement of heavy vehicles would be an ongoing presence in the surrounding area. For households living nearby, this is not simply a matter of occasional noise. It means potentially living with prolonged disruption, reduced enjoyment of our home and garden, and the loss of the peace and quiet that are an important part of rural residential life.

We are particularly concerned about the additional traffic using the local road network. The applicant's assessment predicts a 6dB increase in construction traffic noise on the L7828 and classifies this as a significant effect over approximately 12 months. This is a substantial change in the context of a rural road and nearby homes. The increased movement of heavy vehicles would also bring additional noise, activity and disturbance throughout the construction period.

We acknowledge that the applicant's assessment predicts that construction noise from the substation and BESS works will remain below the relevant assessment thresholds at the representative receptors. However, these are general predictions and do not necessarily reflect the experience of every household. The duration, timing and proximity of individual construction activities, together with construction traffic and other works associated with the wider development, must be considered in assessing the actual impact on nearby residents.

We also have concerns about the noise that will be generated once the substation is operational. Transformers and other electrical equipment will be a permanent feature of the development, operating in close proximity to residential properties.

The applicant's Noise and Vibration Impact Assessment confirms that octave-band data was not available for the proposed plant items and that, as a result, an objective assessment of potential tonal noise could not be undertaken at the pre-planning stage. The report states that characteristics such as low-frequency noise and tonality may typically be investigated and measured following construction in response to a complaint, with mitigation considered if significant adverse noise characteristics are verified. We are concerned that this leaves an important aspect of the potential operational noise impact unresolved until after the development is built and residents may already be experiencing disturbance.

We do not believe residents should have to live with potentially disturbing noise before its characteristics and effects are properly investigated. The absence of complete information at the planning stage creates uncertainty for those who will have to live alongside the infrastructure.

The combination of prolonged construction disturbance, increased heavy vehicle movements and the permanent operation of the substation has the potential to significantly affect the quiet enjoyment of our home. These impacts are particularly concerning given the established residential nature of the area and the proximity of our home to the proposed development.

6. Groundwater, Private Wells and Surface Water Drainage

We have a private well supplying our home. The applicant's Land, Soils, Geology, Hydrology and Hydrogeology Assessment identifies the underlying groundwater body and aquifer conditions and acknowledges that information on private wells is incomplete. The assessment also recognises that dwellings may have private wells which are not recorded in available databases.

The report identifies potential pathways for contamination during construction and operation, including sediment-laden runoff, hydrocarbons, fuels, oils and other potentially polluting substances. It also identifies the need for controls in relation to transformer oils, fuel storage, drainage and surface water management.

The drainage documentation proposes a range of measures, including swales, settlement ponds, French drains, soakaways and other sustainable drainage measures. A soakaway measuring approximately 5m x 5m x 1.8m is proposed at the substation.

The presence of proposed drainage infrastructure does not, in itself, demonstrate that the system is suitable for the actual site conditions or that it will adequately protect groundwater and neighbouring properties. The drainage documentation also refers to further investigation and testing of soakaway suitability. The suitability and effectiveness of these arrangements should be established rather than relying on assumptions which may only be tested after construction has commenced.

We are particularly concerned that any contamination or alteration to groundwater could have serious consequences for households relying on private wells. Such residents do not have the same alternative supply arrangements as properties connected to a public water network.

We also ask that the Commission consider the potential for pollution arising from an emergency incident, including the containment of transformer oil, fuel and potentially contaminated firewater. It should be demonstrated that these substances could be contained and prevented from entering surrounding land, drainage channels or groundwater in the event of a fire or other incident.

We ask the Commission to ensure that the potential effects on private wells, groundwater and surface water drainage have been adequately assessed and that the applicant has demonstrated that the proposed drainage and pollution-prevention measures are appropriate to the specific site conditions.

7. Fire Safety and Emergency Response

The application includes high-voltage electrical equipment and transformers, as well as associated fuel and oil storage arrangements. The wider Greenhills development also includes a separate BESS facility. We recognise that the BESS is a distinct element of the wider project and do not seek to conflate its risks with those of the substation itself.

Nevertheless, the Commission should be satisfied that the risks associated with the proposed substation infrastructure have been properly assessed, including fire prevention, detection, containment, access for emergency services and the protection of neighbouring properties and the surrounding environment.

The application should clearly demonstrate how transformer oil, fuel and potentially contaminated firewater would be contained and prevented from escaping the site and entering surrounding land, drainage channels or groundwater in the event of a fire or other emergency.

The Commission should also be satisfied that the emergency arrangements for the substation have been properly distinguished from those relating to the separate BESS facility, while still considering any cumulative implications of the wider development.

We ask that the relevant fire safety, pollution containment and emergency response arrangements be examined before any decision is made, rather than relying on general assurances that these matters will be addressed at a later stage.

8. Cumulative Impact of the Wider Greenhills Development

The proposed substation cannot be considered in isolation from the wider Greenhills Renewable Energy Park and associated infrastructure. The wider project includes a large-scale solar development, a BESS facility, the proposed substation and associated grid connection infrastructure. These elements are closely related and will collectively change the character of this rural area.

Residents will experience the combined effects of construction activity, traffic movements, noise, visual change, lighting and the permanent presence of substantial energy infrastructure. These effects may overlap and compound one another, particularly for households living closest to the development.

The Commission should consider the combined and sequential effects of the wider development, including the extent and duration of construction activity, the permanent visual presence of the infrastructure and the overall change to the character of the area. The fact that individual elements may be assessed separately should not result in the cumulative effect on neighbouring residents being underestimated.

We also ask the Commission to consider the relationship between the proposed 40-year operational lifespan of the wider solar development and the intended lifespan of the substation and associated grid infrastructure. It is not clear to us whether the substation and grid connection infrastructure are intended to remain in place beyond the operational life of the solar farm.

The applicant should clearly explain what decommissioning or removal arrangements would apply to the substation compound, transformers, buildings, towers and associated infrastructure at the end of the relevant operational period. It should also be made clear what land restoration would involve and whether the infrastructure would

actually be removed or could remain in place beyond the lifespan of the solar development.

This is important because the development represents a substantial and long-lasting change to the area. Residents should be able to understand the full duration of the proposed development and what will happen to the infrastructure at the end of its stated operational life.

9. Lack of Meaningful Consultation and Engagement with Directly Affected Residents

Despite the scale and proximity of the proposed development to our family home, there has been no direct or targeted engagement with our household regarding the specific circumstances of our property. We have never met representatives of the developer, and no proactive effort was made to engage with us before the planning application was submitted, notwithstanding that our home is identified as House 264 and H80 in the wider project assessment material.

Engagement has primarily consisted of generic newsletter drops and an invitation for members of the public to make individual appointments to attend information sessions. In our view, this did not provide a meaningful opportunity to understand the full scale and layout of the proposed development, particularly the relationship between our home and the substation, solar arrays, BESS infrastructure, access routes and associated works.

The information circulated at the time did not clearly demonstrate the location, scale and nature of all key infrastructure elements. As a result, residents were not necessarily in a position to understand the overall development and its potential effects on their homes. We believe that more proactive engagement with those living closest to the proposed infrastructure could have identified site-specific concerns at an earlier stage and allowed potential design changes or additional mitigation to be considered before the application was finalised.

We are not aware of any community meeting having been held, and no targeted engagement took place with our household despite its proximity to the proposed development. This placed the responsibility on individual residents to seek out information and arrange to meet the developer, rather than ensuring that those most directly affected had a genuine opportunity to understand and discuss the proposals. For households with caring responsibilities, including those supporting children with additional needs, this approach can present an additional barrier to participation. We have not been given an opportunity to raise our concerns directly with the project team or to discuss how the particular circumstances of our home and family might be addressed. This is especially concerning given that our home forms part of an established residential cluster and that the proposal introduces substantial electrical infrastructure into an area where people already live.

While consultation with residents is not a substitute for a proper planning and environmental assessment, meaningful engagement can help an applicant understand

the receiving environment, identify the concerns of neighbouring households and consider appropriate measures to reduce potential impacts.

The absence of such engagement has left us with significant unanswered questions about how the applicant has understood and taken account of the circumstances of the households living closest to the proposed infrastructure. We ask the Commission to take this lack of site-specific engagement into account when considering the adequacy of the applicant's assessment and the extent to which the concerns of directly affected residents have been properly identified.

Conclusion
We respectfully ask An Coimisiún Pleanála to give careful consideration to this objection and to the concerns raised regarding the suitability of the proposed Greenhills 220kV Substation in its proposed location.

Our objection is based on the relationship between a substantial and long lasting electrical infrastructure development and an established rural residential environment. We are concerned about the scale and industrial character of the proposal, its visual impact on nearby homes, noise and construction disturbance, traffic on local roads, potential effects on private wells and groundwater, drainage, lighting, security, fire safety, cultural heritage and the cumulative impact of the wider Greenhills development.

We also ask that the Commission take account of the absence of meaningful direct engagement with our household and the particular circumstances of our son, whose additional needs make the potential effects of prolonged disturbance and changes to his home environment especially important.

We recognise the importance of renewable energy and the infrastructure required to support the electricity network. However, the need for such infrastructure does not remove the requirement to select appropriate locations, properly assess environmental and residential impacts and protect the amenity of people living in the surrounding area.

We do not believe that the concerns raised in this submission have been adequately addressed or that sufficient assurance has been provided that the proposed development can be accommodated without unacceptable effects on neighbouring residents and the surrounding environment.

For these reasons, we respectfully request that the Commission refuse permission for the proposed development.

Yours faithfully,
Trish & Seán McCarthy

Views from our front garden, the roadside immediately outside our home and rooms within the house looking onto the proposed development



Front Garden View 1



Front Garden View 2



Front Garden View 3



View from our entrance



Roadside View 1



Roadside View 2



Roadside View 3



Front Room View 1



Front Room View 2

Views From Upstairs



Bedroom 1 View



Bedroom 2 View

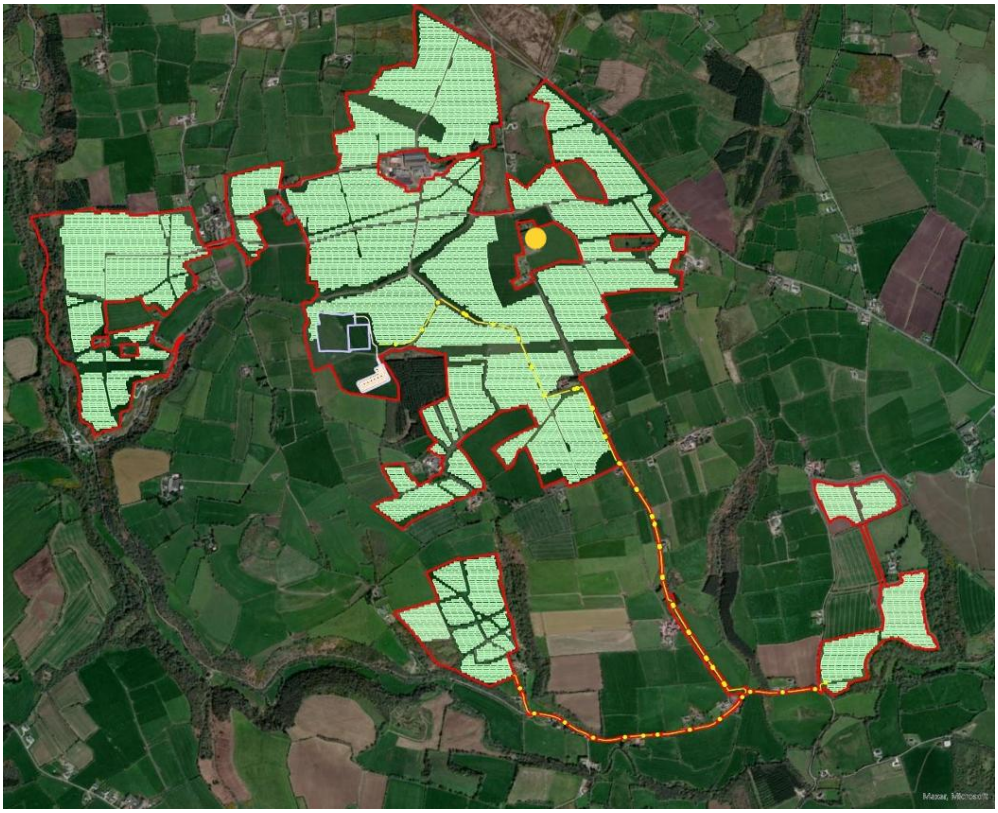


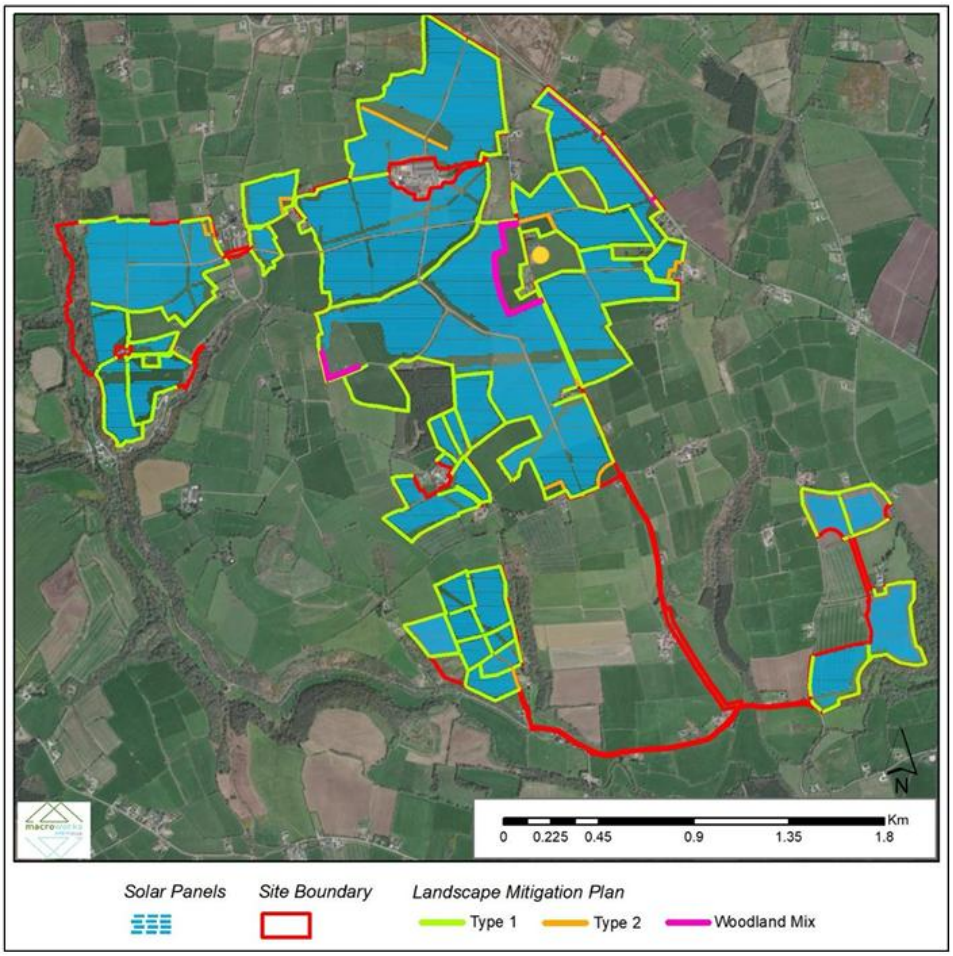
Bedroom 3 Front View 1



Bedroom 3 Front View 2

Location of Our Home in Relation to the Proposed Development
The yellow dot identifies the location of our home within the surrounding development area, illustrating its proximity to the proposed infrastructure and the extent of the wider development.

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0 0.225 0.45 0.9 1.35 1.8
Km
Solar Panels
Site Boundary
Landscape Mitigation Plan
Type 1
Type 2
Woodland Mix