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Inch
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1st November 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 an adult educator and a local resident, living 1.5 kilometres from the proposed development. This Observation concerns the substation application only. The solar farm and battery storage are separate applications. However, the station and loop-in are sought as permanent works. Section 6.3 of Appendix H states they will be handed to the network operator and not decommissioned, so they must be judged as permanent infrastructure in their own right.

a) Water Pollution

I live in a rural area with no access to mains water. Our drinking water comes from local supplies and wells. The site drains to the Carignass, Knocknappagh, Ballyleague, Ballygarvin and Youghal Park streams and to the Tourig and Glendine rivers, which flow on to the River Blackwater, a European designated site. The CEMP identifies EPA designated drinking water rivers as sensitive receptors. It also records that the Glenville Groundwater Body, a locally important aquifer, underlies most of the site, with high groundwater vulnerability and extreme vulnerability near the rivers and to the south (CEMP sections 3.1 to 3.5).

The works are substantial. Appendix B of the CEMP (Spoil Management Plan) refers to about 13,600 cubic metres of topsoil and 39,690 cubic metres of subsoil across 4.71 hectares. That exposes the ground to rain and silt-laden run-off, and Appendix F describes a network of historic and unmapped drains leading to the Tourig. In operation, two 33/220kV transformers will contain oil, and the drainage relies on an interceptor and soakaways, including an infiltration area of 5m by 5m by 1.8m (CEMP section 3.2.2). The applicant's own Schedule of Mitigation (Appendix C, section 11.5.4.4) accepts a residual risk of accidental spillages and leaks.

My questions are who inspects, and what happens if something goes wrong. The Water Quality

Monitoring Plan (Appendix E, section 3.2) proposes daily inspections, pH testing and monthly sampling during construction. But the plan is still to be agreed with Cork County Council and Inland Fisheries Ireland. I see no equivalent regime for the operational life of a permanent station, and no emergency response plan for private well users. The Commission must also be satisfied, under Article 6(3) of the Habitats Directive, that there is no reasonable scientific doubt about effects on the Blackwater.

b) Hydrology and Flooding

Storm Babet showed how this area behaves. Roads flooded and failed, children were stranded at school, and homes were damaged. That happened on undisturbed ground. Appendix N confirms that the red line site is outside the mapped flood zones. It also records mapped flooding on the adjoining Tourig_020 and Glendine_010 watercourses and states that local knowledge indicates flooding within the same sub-basin (section 1.8.3). A site outside a flood zone is not necessarily a site without flood consequences.

Appendix N describes the effect on land as "moderate, adverse and permanent". It records excavation of up to about 3.6 metres and about 9,320 cubic metres of imported stone to cap the platform (sections 1.4.1.2 and 1.4.1.3). The Flood Risk Assessment calculates that a 1-in-100-year storm would add 0.016 to 0.185 cubic metres per second of run-off, up to about 4.15 percent of the relevant micro-catchment (section 1.9.1.1). The same appendix accepts that unmitigated construction run-off could cause flooding on site or downstream, and that poorly designed drainage could create new pathways and erosion. For a community already flooded, an acknowledged increase in run-off is a serious matter. Earthwork figures also differ between documents. Drawing 300101185-DR-213 shows a cut of 17,304 cubic metres and a fill of 34,669 cubic metres, while Appendix N and the CEMP give other figures. These should be reconciled and the flood modelling tested against them.







c) *Site Location*

The site is unsuitable. I am not aware of any assessment of reasonable alternatives for the substation, as required by Article 5(1)(d) of the EIA Directive (2011/92/EU as amended by 2014/52/EU) and by Schedule 6 of the Planning and Development Regulations 2001, as amended. The application gives no comparison of other locations along the 220kV route and no clear criteria for choosing this one. The apparent driver is landowner agreement, which is a commercial convenience and not a planning rationale.

Appendix A records 342 houses within 1.5 km of the wider site. A comparison of sites could have tested residential exposure. I also note the absence of any supporting letter from EirGrid for this location. The local road is poorly suited to a 150 tonne transformer delivery and to emergency vehicles in wet conditions, and the site is acknowledged to be wet.

d) *Lack of Regulation*

National guidance specific to large scale energy infrastructure remains limited, and applicants and the Commission must therefore work with a thin framework. In that context, the Commission cannot rely on the applicant's documents alone. It should carry out its own independent EIA, including cumulative assessment with the related solar development. Section 15(1) of the Climate Action and Low Carbon Development Act 2015 imposes a qualified duty to act "insofar as practicable". Climate objectives do not displace the need to weigh water, flood risk, heritage, road safety and local amenity. The community will not benefit directly from a substation in this rural setting, and these local harms are permanent.

e) Lack of Public Consultation

Appendix A shows that Newsletter 1 reached about 342 houses within 1.5 km, and that only 42 households within 1 km were spoken to directly. Some later invitations were returned undelivered by An Post because they lacked a name. The August sessions at Inch Community Centre were largely pre-booked individual appointments, and I know of residents who requested meetings and were not facilitated. Newsletter 2 stated that the layout was still being drafted, so much of the engagement preceded the final design, the full assessments and the photomontages. That is not the informed, open consultation the community was entitled to expect. Not only was there little to no consultation, but that was from the initial Orsted and there has been NO communication from the new company Perigus.

f) Archaeology

An archaeological assessment exists, but it does not address this compound. Appendix R relies on non-intrusive gabion or ballasted foundations and buffers to preserve anomalies M1 to M4 in situ. Drawing 300101185-DR-213 shows a platform formed by deep cut and fill to a level of 109.05 m, which cannot sit on gabions. The geophysical survey (licence 26R0042) covered a "significant portion" of the site, not all of it, and the applicant does not state that the compound, tower bases or widened access lay within the surveyed area (Appendix R, paragraph 3.15). Paragraphs 6.34 and 6.35 rely on monitoring during construction, with preservation in situ "where feasible". On a platform that must be cut to level, that will not be feasible. Paragraph 3.14 records that Cork County Council found the archaeological assessment for the solar application inadequate. The hillfort at Rath, CO067-001001, lies 490 m west of the boundary (paragraph 4.15), yet I find no specific assessment of the effect of a permanent compound, lightning masts and towers on its setting.

g) Emergency Risk and Fire

When a neighbour's thatched cottage burned, fire appliances queued along a narrow boreen and took turns refilling from the river. The fire burned for 24 hours. Here there are no hydrants. The application contains two oil-filled transformers and a diesel generator and tank (Planning and Environmental Report, section 4.3). The EIA Screening Report, section 3.7.8 and Table 4.1, rates major accident risk as low but does not assess a transformer or diesel fire. Drawing 300101185-DR-200 states "Bunds to be fitted with TBC at Detailed Design". Oil volumes, bund capacity and retention of firefighting water are not stated, and the drawing shows surface water passing to a separator and soakaways. There is no fire appliance swept path, gate width or turning assessment for the route from Site Access No. 1 on the R634 (drawing 300101185-DR-100B). Appendix M does not assess this route. These are matters of public safety and cannot be left to detailed design.







h) <u>Cumulative Impact</u>

East Cork should not be allowed to become an industrial zone or suffer as collateral damage in the pursuit of national carbon neutrality targets. While the transition to renewable energy and reduced carbon emissions is an important national objective, it must be achieved in a manner that is balanced, sustainable, and respectful of the communities and landscapes that are asked to accommodate such developments.

The cumulative impact of large-scale infrastructure projects across East Cork is fundamentally changing the character of an area that has long been valued for its rural environment, agricultural heritage, natural beauty, and established communities. There is a growing concern that East Cork is bearing a disproportionate share of industrial-scale energy and infrastructure development without sufficient consideration of the long-term consequences for residents, local businesses, tourism, agriculture, and the wider environment.

Climate action should not come at the expense of local communities. The national objective of achieving carbon neutrality must be balanced against the need to protect the quality of life of existing residents, preserve the distinctive character of the East Cork landscape, and ensure that development is distributed fairly across the country. Concentrating significant industrial infrastructure in one region risks creating unacceptable visual, environmental, and social impacts while delivering limited local benefit.

I respectfully submit that planning decisions must consider not only the anticipated national benefits of the proposed development but also the cumulative burden being placed on East Cork and its communities. Sustainable development requires a balanced approach that safeguards both environmental objectives and the interests of those who live and work in the affected area.

<u>Conclusion</u>

For these reasons I respectfully ask the Commission to refuse permission. At a minimum, I ask that it request further information on the matters raised, including alternatives, drainage and fire water containment, flood modelling, archaeological testing within the compound footprint, and emergency access, before any decision is made.

Is mise,

Audrey O' Brien