Breda Budds
Rath Inch
Killeagh 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,

I am a resident living between 200 and 500 metres from the proposed substation, and I rely on a private well. This Observation concerns the substation application only. I do not object to renewable energy in principle. However, the substation is permanent and would remain after any solar farm is decommissioned, so it must be assessed on its own merits.

(a) Emergency Risk and Fire
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This is my paramount concern. My home is surrounded by woodland, and I would be among the first people affected by fire and smoke. Section 4.3 of the Planning and Environmental Report lists two transformers and a diesel generator and tank, but does not describe them as oil-filled or bunded, although the site notice does. Schedule 7 of the Planning and Development Regulations 2001, as amended, requires consideration of the risk of major accidents and disasters. The EIA Screening Report, section 3.7.8 and Table 4.1, rates that risk as low but does not assess a fire at the transformers or diesel tank. Drawing 300101185-DR-200 states that bunds are "TBC at Detailed Design", gives no oil volume, and does not show firefighting water being retained rather than passed to the separator and soakaways. I also find no fire appliance swept path, gate width or turning assessment from Site Access No. 1 on the R634 to the transformer bays in section 4.3, Appendix H or drawing 300101185-DR-100B. Appendix M does not assess this route. I can find no assessment of fire spreading to surrounding woodland in summer, or of any emergency arrangements for neighbouring homes.

(b) Water Pollution
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My well and the public supply serving Inch village draw on groundwater very close to the site. The CEMP records that the site lies largely over the Glenville Groundwater Body, mostly of high vulnerability and extreme in places, and that EPA designated drinking water rivers are sensitive receptors (CEMP sections 3.1 and 3.5). Surface water drains through the Tourig to the River Blackwater. The CEMP also relies on infiltration and soakaways, including a soakaway within the compound (sections 3.2.2, 3.3 and 3.4), while two 33/220kV transformers will hold oil. The applicant's own Water Quality Monitoring Plan accepts that a risk of accidental spillage remains despite mitigation (CEMP Appendix C,

section 11.5.4.4). The extensive construction controls listed in Appendix C, sections 11.5.2 to 11.5.5, confirm that the risk is real. The application does not explain what water would reach the soakaway or how it would be treated first. A pathway to a drinking water aquifer is not acceptable on the strength of conditions yet to be agreed.

(c) Hydrology and Flooding

During Storm Babet in 2023 my home experienced about eight feet of water above its normal wet weather level, and my entrance walls collapsed. The proposed site is a basin that locals know to be wet for most of the year outside summer. I can provide photographs and video if the Commission wishes. Appendix N records excavation of up to about 3.6 metres, approximately 9,320 cubic metres of imported stone, and a permanent adverse effect on the land occupied (sections 1.4.1.2 and 1.4.1.3). Section 1.8.3 acknowledges that local knowledge indicates flooding within the same sub-basin. Section 1.9.1.1 calculates an increase in runoff in a 1-in-100-year event of up to about 4.15 percent of the micro-catchment, and accepts that without mitigation flooding could occur downstream. The absence of a mapped flood zone under the compound does not show an absence of risk to homes like mine. The applicant should demonstrate, using winter conditions, that downstream flooding will not worsen.

(d) Site Selection and Alternatives

The EIA Directive 2014/52/EU, and Schedule 6 of the Planning and Development Regulations 2001, as amended, require a description of reasonable alternatives and a comparison of environmental effects. I cannot find a comparative assessment of alternative substation locations along the 220kV route, nor any criteria used to select this site. Landowner availability appears to be the only driver. The land is suited to agricultural use because of its topography, and the access road is poorly suited to heavy vehicles, including transformer deliveries of about 150 tonnes (Appendix M, section 1.3.3) and emergency vehicles. No letter of support from EirGrid or ESB Networks is evident for this specific location. Without a genuine comparison, the Commission cannot be satisfied that this is the least harmful location.

(e) Lack of Public Consultation

My only contact from the developer came under its previous identity as Orsted. Appendix A shows that direct engagement was confined to roughly 342 houses within 1.5 kilometres, that some invitations were returned undelivered, and that the August sessions were largely pre-booked individual appointments. Newsletter 2 stated that the layout was still being drafted. Residents therefore commented before the final layout, photomontages and technical reports existed. I understand that other residents requested one-to-one meetings that were not facilitated. In my view this falls short of the effective public participation contemplated by the Aarhus Convention and the EIA Directive, particularly for a permanent 220kV installation near homes.

(f) Archaeology

Appendix R relies on non-intrusive gabion or ballasted foundations to preserve anomalies M1 to M4 in situ. Those are solar measures. Drawing 300101185-DR-213 shows the compound formed by cut of 17,304 cubic metres and fill of 34,669 cubic metres, so such measures cannot apply. Paragraph 3.15 states that the geophysical survey covered only a significant portion of the site, and the applicant does not confirm that the compound, tower bases or access widening were within it. Paragraphs 6.34 and 6.35 rely on monitoring during construction, with preservation in situ only "where feasible", which on a cut platform means recording and then building. Paragraph 3.14 records the Council asking for sub-surface assessment before a decision on the solar application. The hillfort at Rath (CO067-001001), 490 metres west of the site boundary, is described at paragraph 4.15 but its setting is not specifically assessed against

a permanent compound, lightning masts and new towers. Ardagh church and other local heritage sites also warrant consideration.

Conclusion

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The Budds family have a long interest in this area and wish to see it protected for future generations. For the reasons above, I respectfully ask the Commission to refuse permission. At minimum, I ask that further information be requested on fire and emergency management, oil volumes and bund design, groundwater protection, flood risk under winter conditions, alternative sites, and sub-surface archaeology within the compound footprint.

Is mise,

Breda Budds