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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 local farmer and agri tourism operator, and my home and business are approximately 2km from the proposed site. This Observation concerns only the substation and loop-in application. The substation is permanent. It is to remain, and be handed to EirGrid, even if the solar farm is decommissioned, so it must be assessed on its own merits as a permanent installation.

Water Quality
My crops depend on a reliable water supply, and one of the key selling points of my guest accommodation is that our water is fresh from the tap. Any decline in water quality would harm my income and could put guests at risk. The applicant's own CEMP identifies the risk. The site drains through streams, historic drains and unmapped channels to the River Tourig and on to the River Blackwater, a European designated site (CEMP Appendix F, Section 3.2). EPA designated drinking water rivers are identified as sensitive receptors (CEMP Sections 3.1 and 3.5). The site lies largely over the Glenville Groundwater Body, with high groundwater vulnerability across most of the site and extreme vulnerability to the south (CEMP Sections 3.3 and 3.4).

The Spoil Management Plan (CEMP Appendix B) refers to about 13,600 cubic metres of topsoil and 39,690 cubic metres of subsoil across 4.71 hectares, leaving exposed ground open to silt and sediment runoff. Two 33/220kV transformers will hold oil. Surface water is directed to an interceptor and soakaway, including a 5m x 5m x 1.8m infiltration area in the compound. The Water Quality Monitoring Plan itself accepts a residual risk of spillages, leaks and overloading of surface water

infrastructure (CEMP Appendix C, Section 11.5.4.4). Discharge to ground over a highly vulnerable aquifer, with drinking water users downstream, calls for far more than assurances. I ask the Commission to require full details of what may reach the soakaway and how it will be treated, and to satisfy itself under Article 6(3) of the Habitats Directive in respect of the Blackwater.

Site Selection and Alternatives
The application material I have reviewed contains no comparison of reasonable alternative locations along the 220kV line. Schedule 6 of the Planning and Development Regulations 2001, as amended, reflecting the EIA Directive, requires a description of the reasonable alternatives studied and the main reasons for the choice made. The only apparent rationale for this site is landowner agreement, which is not an objective planning criterion. The applicant's own documents indicate effects on more than 300 homes, and an assessed alternative along the same line might well have affected fewer. I also note that the file contains no EIAR, and I ask the Commission to consider whether the information before it is adequate for a permanent 220kV installation. I have seen no letter of support from EirGrid for this specific location.

Noise, Vibration and Construction Traffic
Appendix S is titled for the Greenhills Renewable Energy Park and covers the solar farm, trenching, the battery compound and the substation together. The distances in Table 1.1 (5m and 8m) are to the energy park boundary, not to the platform on drawing 300101185-DR-213, and the report gives no distance from this compound or access to any house. The BS 5228 test used at Section 1.2.5.1 is 65 dB at a house for more than 10 days in any 15, or more than 40 days in six months. Section 5.5.6.1 puts the substation works at about 16 months, so the duration limb is met if the level is. That level has not been calculated for this platform, the access, or the haul to Site Access No. 1. The 23 to 45 dB column in Table 1.28 is not that calculation.

The earthworks figures are also inconsistent. Drawing DR-213 gives a cut of 17,304 cubic metres and a fill of 34,649. Its notes give 36,649 plus 9,490 of capping stone. Section 5.5.6.1 gives 25,013 and states that all excavated material will be reused. These cannot be reconciled, and on either drawing figure fill must be imported. My home and business sit at a similar level across the valley, so sound will carry to us. Heavy traffic on the R634 and local roads would disturb the quiet my guests come for and lengthen my own commute for work.

Visual Impact
The LVIA uses GLVIA3 and 24 viewpoints, and it accepts that residents are highly sensitive receptors and that several dwellings surround the substation (page 28). However, its residential viewpoints, such as VP4 and VP5, discuss panels, hedgerows and screening rather than the substation. There is no dedicated residential assessment of a compound of about 22,632 square metres, a 438 square metre control building, a 590 square metre IPP building, transformers, lighting, a 2.6m fence, approximately 18m lightning masts and 37.5m lattice structures. The LVIA's reasoning that 3.4m panels will be screened by vegetation

cannot be transferred to structures of 18m and 37.5m. The proposal also relies on planting that, by the applicant's own account, needs three years to establish. No ZTV analysis or winter and year-ten views from the nearest homes are shown. Our guests come for the views and wildlife, and this is central to my business.

Fire and Emergency Risk
Schedule 7 of the Regulations requires consideration of the risk of major accidents and disasters. The EIA Screening Report at Section 3.7.8 addresses concrete, hydrocarbon spills from plant and construction accidents, and Table 4.1 rates the risk as low. Neither it, Section 4.3 of the Planning and Environmental Report, nor Appendix H assesses a fire at the oil-filled transformers or the diesel tank. The oil volume is not stated. Drawing 300101185-DR-200 notes bunds to be fitted with "TBC at Detailed Design" and does not show that firefighting water would be retained rather than passing through the separator to a soakaway. Nor is there a fire appliance swept path, gate width or turning assessment from Site Access No. 1 on the R634 to the transformer bays (drawing DR-100B). Appendix M concerns the energy park, not this route, and Section 1.3.3 refers to transformers of about 150 tonnes. In increasingly dry summers, a fire at a permanent installation beside farmland is a serious concern, and these matters should not be deferred.

Conclusion
This proposal places the future of my business and family at serious risk. For the reasons above, I respectfully ask the Commission to refuse permission. At a minimum, I ask it to seek further information on alternatives, noise and traffic specific to the substation, a dedicated residential visual assessment, drainage and groundwater protection, and fire safety and emergency access.

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Caroline McCarthy