David Nolan
3 Inch na Rince
Inch
Killeagh
Co Cork.

17th 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 Nurse Manager and I live in the village of Inch with my wife and three children, between 1 and 5 kilometres from the site. I make this Observation on the substation application only. I do not oppose renewable energy in principle. However, the substation is permanent: it is to be handed to EirGrid and will remain even if the solar farm is decommissioned after 40 years. It must therefore stand on its own merits.

I. SITE LOCATION

The applicant has not shown that this is an appropriate location. The EIA Directive, as amended by Directive 2014/52/EU and transposed through the Planning and Development Regulations 2001, as amended, requires a description of the reasonable alternatives studied and a comparison of their environmental effects. The documents before the Commission contain no comparison of alternative sites along the 220kV route. The only apparent rationale is the availability of this land. Landowner agreement is a commercial convenience and not a planning criterion. No clear criteria, such as distance to dwellings, ground conditions, flood risk or road access, have been set out and tested against other options. Alternatives along the same line may well have affected far fewer homes. I also note that there is no EIAR. I ask the Commission to consider carefully whether screening alone is adequate for a permanent 220kV installation in a wet rural landscape. The site is reached by a single new entrance off the R634, and transformers of about 150 tonnes must be delivered to it.

II. VISUAL IMPACT

This is open, green countryside. The proposal introduces an industrial compound of approximately 22,632 square metres, with a 438 square metre control building, a 590 square metre IPP building, two transformers, outdoor equipment, 2.6 metre fencing, lighting masts and lightning protection masts of about 18 metres. The LVIA acknowledges that residents are highly sensitive receptors and, at page 28, that several dwellings lie around the substation. Yet it provides no dedicated residential visual assessment of the substation. VP4 and VP5 are said to represent dwellings, but their analysis concerns solar panels,

hedgerows and screening. The reasoning that panels not exceeding 3.4 metres will be screened cannot be transferred to 18 metre masts or the 37.5 metre lattice structures, which may rise above hedgerows. No ZTV analysis or photomontage from the nearest houses addresses this. The LVIA also relies on new planting with a three year establishment period, but does not show views on completion, after ten years, or in winter.

III. NOISE AND VIBRATION

Appendix S is the noise assessment for the Greenhills Renewable Energy Park as a whole. It is not an assessment of this station and its access. The closest distances in Table 1.1, 5 m and 8 m, are to the energy park boundary, not to the platform on drawing 300101185-DR-213, and no distance from the compound or access to any house is given. The BS 5228 test in section 1.2.5.1 is 65 dB at a house for more than 10 days in 15 or 40 days in six months. Section 5.5.6.1 puts these works at about 16 months, yet the level has not been calculated for this platform or access. The fill figures are also inconsistent. Drawing DR-213 gives a cut of 17,304 cubic metres and fill of 34,649 in its summary but 36,649 in its notes, plus 9,490 of capping stone. Section 5.5.6.1 gives 25,013 and says all excavated material will be reused. Fill exceeds cut on the drawing, so imported material and the associated heavy traffic on the access and the R634 have not been assessed. Operational noise and vibration from a permanent substation have likewise not been assessed on their own.

IV. EMERGENCY RISK AND FIRE

The site notice describes two oil-filled transformers in bunded enclosures, together with a diesel generator and fuel tank. Section 4.3 of the Planning and Environmental Report does not say oil-filled or bunded. Schedule 7 of the 2001 Regulations requires consideration of the risk of major accidents and disasters. Yet section 3.7.8 and Table 4.1 of the screening report deal with concrete, construction hydrocarbon spills and site accidents, and not a fire at the transformers or diesel tank. Drawing DR-200 shows a separator and soakaways, and notes bunds "to be fitted with TBC at Detailed Design". The oil volume is not stated, and there is no demonstration that firefighting water would be retained rather than discharged to soakaways. No fire appliance swept path, gate width or turning assessment is provided for the red route on drawing DR-100B to Site Access No. 1. Fumes from a fire would be a serious risk to my family and community.

V. HYDROLOGY AND FLOODING

Inch was heavily flooded during Storm Babet in October 2023. Appendix N records a substation footprint of about 1.8 hectares with a "moderate, adverse and permanent" effect on land, excavation of up to about 3.6 metres, and imported stone capping. It acknowledges that the Tourig_020 and Glendine_010 watercourses have mapped flooding and that local knowledge indicates flooding within the same sub-basin. The applicant's own flood risk assessment calculates a 1-in-100-year runoff increase of 0.016 to 0.185 cubic metres per second, up to about 4.15 percent of the micro-catchment. A site outside a mapped flood zone is not free of downstream risk. I have not seen it shown that this increase will not worsen flooding in Inch, particularly where drainage relies on soakaways on wet ground.

VI. CONCLUSION

I chose to live here for the landscape, the green fields and the sense of community. The prospect of this substation has caused considerable concern and anxiety for my family, my neighbours and me. For the reasons above, I respectfully ask the Commission to refuse permission. At a minimum, I ask that further information be requested on alternative sites, a residential visual assessment, a station-specific noise and vibration assessment, fire and firewater management, emergency access, and downstream flood risk.

Is mise,

David Nolan