Elizabeth Coleman
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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 resident living between 500 metres and 1 kilometre from the proposed development. This observation concerns the substation application only. The solar farm and battery storage are a separate application. However, the substation and loop-in are sought permanently and, under section 6.3 of Appendix H, will be handed to the network operator and not decommissioned. They must be assessed as permanent infrastructure.

Fire Risk and Emergency Response

My priority concern is fire. I will be living in fear of a fire at this station, and the application does not reassure me. Section 4.3 of the Planning and Environmental Report lists up to two 220kV transformers and a diesel generator and fuel tank. The site notice describes the transformers as oil-filled and bunded, but section 4.3 uses neither word. I could not find the oil volume on the site notice, in section 4.3 or on drawing 300101185-DR-200.

Schedule 7 of the Planning and Development Regulations 2001, as amended, requires consideration of the risk of major accidents and disasters relevant to the project. The EIA Screening Report addresses this at section 3.7.8, but only in terms of concrete, construction plant spills and construction-site accidents. Table 4.1 rates the risk as "Low - Construction and operation - design to mitigate". Neither section 3.7.8 nor section 4.3 nor Appendix H assesses a fire at the transformers or the diesel tank.

Drawing DR-200 states that bunds are "TBC at Detailed Design" and that the drawing is for information and subject to change. It shows a full-retention separator and soakaways on the surface-water system. It does not show that a bund will hold transformer oil together with firefighting water. Contaminated water could therefore reach the soakaway. Rainwater harvesting is shown but is not described as a firefighting supply.

Emergency access is also unaddressed. Because the station will outlast the solar farm, the red-line route from Site Access No. 1 on the R634 is the route a fire appliance must use. Neither section 4.3, Appendix H nor drawing DR-100B provides a swept path, a gate width or a turning assessment. Drawing DR-210 is a gate and fence detail only, and Appendix M assesses traffic for the Greenhills Energy Park, not this

route. I am concerned that local fire brigades are not equipped or trained for a fire of this kind. The applicant should be required to demonstrate, in consultation with the fire authority, how such a fire would be fought and contained.

Water Pollution

A fire is also a pollution event. The CEMP records that the site drains through historic and unmapped channels to the River Tourig and on to the River Blackwater, a European designated site. It identifies EPA drinking water rivers as sensitive receptors and a site largely underlain by the Glenville Groundwater Body, mostly of High vulnerability and Extreme in places. Yet the drainage relies on soakaways, including an infiltration area of 5m x 5m x 1.8m within the compound. The CEMP deals with oil and fuel through a SuDS train with an interceptor and soakaway. The Water Quality Monitoring Plan itself accepts a residual risk of spills, leaks and overloading of surface-water infrastructure. The applicant should state what water may reach the soakaway, how it is treated beforehand, and how oil and firefighting water are retained.

The cut and fill is also substantial, with the CEMP Spoil Management Plan referring to about 13,600 cubic metres of topsoil and 39,690 cubic metres of subsoil across 4.71 hectares. This exposes the ground to rainfall and the risk of silt reaching the streams. The safeguards depend on plans still to be agreed.

Hydrology and Flooding

Appendix N states that the site is outside mapped flood zones. It also acknowledges mapped flooding along the adjacent Tourig_020 and Glendine_010 watercourses, and notes that local knowledge indicates flooding within the same sub-basin. The substation footprint is about 1.8 hectares, with excavation of up to about 3.6 metres and about 9,320 cubic metres of imported stone, and the effect on land is described as "moderate, adverse and permanent". The Flood Risk Assessment calculates a 1-in-100-year runoff increase of up to about 4.15 percent in the relevant micro-catchment. The absence of a mapped flood zone beneath the compound does not show that downstream flooding will not worsen. Site-specific evidence is needed.

Archaeology

Appendix R is an assessment of the wider renewable energy site. Its avoidance measures, namely gabion or ballasted foundations and stand-off buffers around anomalies M1 to M4, are solar measures. Drawing DR-213 shows the compound formed by cut of 17,304 cubic metres and fill of 34,669 cubic metres to a finished level of 109.05 m. That platform cannot sit on gabion baskets. 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 sections were surveyed. The walkover of 14-16 May 2025 saw only the surface.

Paragraphs 6.34 and 6.35 rely on monitoring during construction and preservation in situ "where feasible". On a platform that must be cut, that is unlikely to be feasible. Cork County Council, as quoted at paragraph 3.14, told the same developer on 10 February 2026 that the solar application was incomplete without a sub-surface archaeological assessment. The substation should meet the same standard. Appendix R also records a hillfort, CO067-001001, 490 metres west of the site boundary, but contains no specific assessment of the effect on its setting of a permanent compound, lightning masts and new towers.

Regulatory Considerations

The Commission must carry out its own independent assessment under the EIA Directive 2011/92/EU as

amended, and should not rest on the applicant's documents alone. These leave gaps on fire, drainage and archaeology that cannot be left to later detailed design. Climate objectives are important, but section 15(1) of the Climate Action and Low Carbon Development Act 2015 imposes a duty only "insofar as practicable". It does not displace the need for full assessment. The Council has also found related applications invalid, which reinforces the need for caution.

Request

For these reasons, I respectfully ask the Commission to refuse permission. At a minimum, I ask it to seek further information on the oil volume, bund capacity and firefighting water retention, the fire-appliance access, the fire authority's views, drainage and flood effects, and sub-surface archaeology across the full compound and access footprint.

Thank you for considering this observation.

Is mise,

Elizabeth Coleman