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13th 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 live just over 5 km from the proposed development and make this observation on the substation application only. I do not object to renewable energy in principle, however, the substation is permanent and would remain after the solar farm is decommissioned at 40 years, so it must be assessed on its own merits as permanent infrastructure.

1. Hydrology and Flooding

Appendix N describes the effect of the 1.8-hectare substation and its new and upgraded access tracks as moderate, adverse and permanent. The works involve excavation of up to 3.6 metres, of cut and fill for the substation and battery compound, and over 9.3k m^3 of imported capping stone, on land that is frequently wet and waterlogged.

Although the site is outside the mapped flood zones, Appendix N accepts that the adjacent Tourig_020 and Glendine_010 watercourses have mapped flooding in low and medium probability zones, and that local knowledge indicates flooding in the same sub-basin. The Flood Risk Assessment predicts a net increase in 1-in-100-year runoff of 0.016 to 0.185 m^3/s (up to about 4.15 percent of the micro-catchment) and accepts that, without mitigation, flooding could occur on site or downstream. The question is whether this site is suitable for permanent infrastructure of this scale, not merely whether drainage can be engineered. I ask that the applicant be required to demonstrate, with site-specific winter evidence, that downstream flooding will not be worsened.

2. Site Location and Consideration of Alternatives

Schedule 6 of the Planning and Development Regulations 2001, transposing Directive 2014/52/EU, and the EPA Guidelines on the information to be contained in Environmental Impact Assessment Reports (2022) require a description of the reasonable alternatives studied and the main reasons for the choice made. There is no EIAR, and I can find no comparison of alternative locations along the 220kV route. The only evident reason for selection is landowner willingness, which is a commercial consideration, not a planning criterion.

No site-selection criteria are stated, such as environmental constraints, proximity to dwellings or road access. The applicant's own documents show a significant impact on over 300 homes, which an alternative on the same route may have reduced. Submissions to Cork County Council and local petitions indicate that consultation was not meaningful. The access road is poorly suited to heavy goods vehicles and, in wet conditions, to emergency vehicles. The drainage work appears to rely on dry summer conditions, which is not the worst case for a wet site, and I have found no EirGrid letter supporting this location.

3. Noise and Vibration

The noise assessment (Appendix S) covers the whole Greenhills Renewable Energy Park together. Its closest distances in Table 1.1 (5 m and 8 m) are measured to the park red line, not to the platform on drawing 300101185-DR-213, and no distance is given from the compound or its access to any house.

The report's own BS 5228 test (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 any six months. The substation works will last about 16 months (section 5.5.6.1), so the duration limb would be met if the level is. Yet the level has not been calculated for this platform, the access or the haul route to Site Access No. 1 on the R634, and the 23 to 45 dB range in Table 1.28 is not that calculation.

The earthworks figures are also inconsistent. Drawing DR-213 shows 17,304 m^3 of cut and 34,649 m^3 of fill, while its notes give 36,649 m^3 plus 9,490 m^3 of capping stone. Section 5.5.6.1 of the Planning and Environmental Report gives 25,013 m^3, all reused. As fill exceeds cut, material and stone must be imported. That traffic belongs to this application, and Chapter 15 and section 3.7.6 of the Screening Report cannot stand in for its assessment.

4. Archaeology

Appendix R relies on solar-farm avoidance measures: anomalies M1 to M4 (fields 22, 58, 63 and 66) are to be preserved by gabion or ballasted foundations and buffers. A cut-and-fill compound with a finished level of 109.05 m (drawing DR-213) cannot sit on gabions, and reversibility does not apply to a permanent station.

The May 2025 walkover recorded surface features only. The geophysical survey (licence 26R0042) omitted the south-western fields, and the applicant does not state that the compound, tower bases or widened access sections were surveyed. Paragraphs 6.34 and 6.35 of Appendix R rely on construction monitoring, with preservation in situ only "where

feasible". On a platform cut to a fixed level, that will not be feasible, and remains would likely be recorded and then built over. Cork County Council's comments of 10 February 2026 (quoted at paragraph 3.14) found the solar application incomplete because sub-surface archaeology had not been assessed. The permanent cut should not be held to a lower standard than the panels.

Nor is there any assessment of the effect of the permanent compound, lightning masts and new towers on the setting of hillfort CO067-001001 in Rath townland, which paragraph 4.15 records 490 m west of the site in a commanding position.

5. Conclusion

For these reasons, I respectfully ask the Commission to refuse permission. Otherwise, I ask that it first request further information on:

- a site-specific flood and drainage assessment using winter conditions
- a comparative assessment of reasonable alternative locations
- a noise and vibration assessment of this compound, this access and the haul route, with distances to dwellings
- reconciled earthworks volumes
- sub-surface archaeological testing of the compound, towers and access, and a setting assessment for CO067-001001

Thank you for considering this Observation.

Kind Regards,

Emily Purcell