Meenoughter
Mount Uniacke
Killeagh
Co Cork

2nd November 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 resident living between 1 and 5 km from the proposed development, and I make this Observation on the above application. It concerns only the 220kV substation, the loop-in and the access shown in red on drawing 300101185-DR-100B. The substation is permanent and will remain if the solar farm is decommissioned, so it must be assessed on that basis. I do not object to renewable energy in principle. My concern is whether this is the right place for this permanent infrastructure and whether it has been properly assessed.

I. HYDROLOGY AND FLOODING

The valley of Inch lies below the site. It is highly prone to flooding and was flooded very badly in Storm Babet in 2023. Appendix N states that the site is not within a mapped flood zone. It also acknowledges that the adjacent Tourig_020 and Glendine_010 watercourses have mapped indicative flooding, and that local knowledge indicates flooding within the same sub-basin (Section 1.8.3). The absence of a mapped zone beneath the platform is not the absence of risk.

Appendix N records a substation footprint of about 1.8 hectares, excavation of up to about 3.6 metres, and a "moderate, adverse and permanent" effect on the land occupied (Sections 1.4.1.2 and 1.4.1.3). The Flood Risk Assessment calculates a net runoff increase of about 0.016 to 0.185 m3/s in a 1-in-100-year event, up to about 4.15 percent relative to the micro-catchment (Section 1.9.1.1). It accepts that poorly designed drainage could create new preferential pathways. In a catchment that already floods, a measurable increase is significant. Consistent with the Flood Risk Management Guidelines, the test is whether flood risk elsewhere is increased. I ask the Commission to require site-specific evidence on flow paths, infiltration and downstream flows, tested against the Storm Babet experience.

II. LACK OF PUBLIC CONSULTATION

Appendix A shows that direct engagement was geographically restricted. Newsletter 1 went to about 342 houses within 1.5 km, and 42 households within 1 km were spoken to directly. A later invitation went to 334 houses, and the applicant accepts that some letters were returned undelivered because they carried no resident name. Locally, not all households received material, and others who asked for one to one meetings were not facilitated. No reasoning is given for the 1.5 km boundary, although construction traffic, landscape effects and cumulative effects reach well beyond it.

The August sessions at Inch Community Centre were largely pre-booked individual appointments. Newsletter 2 stated that the layout was still being drafted. Residents who raised visual concerns were told to wait for photomontages in the application. Consultation on a concept is not informed participation in the scheme finally submitted. I ask the Commission to give this limited reach and timing appropriate weight.

III. ARCHAEOLOGY

The Rath fort and Ardagh graveyard must be protected. Appendix R avoids buried archaeology, including anomalies M1 to M4, by non-intrusive gabion or ballasted foundations and stand-off buffers. Those are solar measures. Drawing 300101185-DR-213 shows the compound formed by cut and fill, with a cut of 17,304 m3 and a finished level of 109.05 m. A platform of that kind cannot sit on gabion baskets, and reliance on reversibility has no place for a permanent station.

The May 2025 walkover sees only the surface. The geophysical survey under licence 26R0042 covered a "significant portion" of the site, not all of it, and the applicant does not state that the compound, the tower bases or the widened access were within it. Paragraphs 6.34 and 6.35 rely on monitoring during construction, with preservation in situ "where feasible". On a platform that must be cut to level, that will not be feasible. Cork County Council's comments of 10 February 2026 (paragraph 3.14) show that the same developer has already been told that sub-surface archaeology must be known before a decision.

Appendix R records the hillfort CO067-001001 in Rath townland, 490 m west of the site boundary, in a commanding landscape position. It contains no specific assessment of the effect on its setting of a permanent compound, lightning masts and new towers. I ask that pre-determination testing of the compound and access be required, together with a proper setting assessment covering the hillfort and the safeguarding of Ardagh graveyard.

IV. EMERGENCY RISK AND FIRE

The station will contain up to two oil-filled transformers within bunded enclosures, and a diesel generator and tank. Schedule 7 of the Planning and Development Regulations 2001, as amended, requires consideration of the risk of major accidents and disasters. Section 3.7.8 of the EIA Screening Report and Table 4.1 rate that risk

as low, but neither assesses a fire at the transformers or the diesel tank. Drawing 300101185-DR-200 states that bunds are "TBC at Detailed Design", gives no oil volume, and does not show that firefighting water would be retained rather than passed through the surface-water system to a soakaway.

Access is a further concern. The community is worried about how fire appliances will reach a site served by very narrow roads. The application includes no swept path from Site Access No. 1 on the R634 to the transformer bays, no stated gate width and no turning assessment. Appendix M is a traffic assessment of the wider energy park, not of this route. This adds risk where none currently exists, and it should be resolved before permission, not left to detailed design.

V. NOISE AND VIBRATION

Appendix S assesses the whole energy park, and its distances in Table 1.1 are to the energy park boundary, not to this platform or access. It gives no distance from the compound or the access to any house. The BS 5228 test it applies is 65 dB at a house for more than 10 days in 15, or more than 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, this access or the haul to Site Access No. 1.

The fill figures are also inconsistent. The drawing summary, the drawing notes and Section 5.5.6.1 (25,013 m3) give different volumes, and the statement that all excavated material will be reused cannot be reconciled with the drawing. Imported fill, 400 mm of capping stone and the delivery of transformers of about 150 tonnes mean sustained heavy traffic on narrow roads. The most vulnerable residents will bear that disruption, and it has not been properly assessed.

VI. CONCLUSION

For these reasons, I respectfully ask the Commission to refuse permission. At minimum, I ask it to request further information on flood and downstream drainage effects, sub-surface archaeology and setting, fire and emergency access, and construction noise, vibration and traffic specific to this application.

Is mise,

Ivor Sweeney