James O'Keeffe
Breeda Killeagh
Cork

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 stud farmer living between 1 and 5 kilometres from the proposed development, and I make this Observation as a local resident. It concerns the substation application only. The solar farm and battery storage are a separate application, but the substation is permanent and will remain after any solar farm is decommissioned. It must therefore be assessed on its own merits.

1. Water Pollution

The site drains to the Tourig and Glendine rivers and on to the River Blackwater, a European designated site. The applicant's CEMP acknowledges a construction pollution risk and identifies EPA designated drinking water rivers as sensitive receptors (CEMP Sections 3.1 and 3.5). The Spoil Management Plan (CEMP Appendix B) describes approximately 13,600 cubic metres of topsoil and 39,690 cubic metres of subsoil being handled across 4.71 hectares. That leaves bare ground exposed to rainfall and silt runoff. The CEMP also records a network of historic and unmapped drains (Appendix F, Section 3.2) which provide a pathway downstream.

The site lies largely over the Glenville Groundwater Body, a locally important aquifer. Groundwater vulnerability is classed as high, and extreme in places near rivers and to the south. Even so, surface water is to be managed by infiltration, including a 5m by 5m by 1.8m soakaway in the compound. Two 33/220kV transformers will hold oil, and the Water Quality Monitoring Plan accepts that a risk of accidental spillage and overloading of drainage infrastructure remains (CEMP Appendix C, Section 11.5.4.4). The extent of the controls proposed, from settlement tanks to daily pH testing, shows how substantial the risk is. I ask the Commission to be fully satisfied, through Appropriate Assessment under the Habitats Directive, that the Blackwater will not be harmed.

2. Hydrology and Flooding

My concern is that the works will remove ground that has long acted as a natural soakage for rainfall, and that the water will then run towards the village of Inch and into the Tourig. The applicant's Appendix N states that the site is not within a mapped flood zone. It accepts, however, that the adjacent Tourig_020 and Glendine_010 watercourses have mapped indicative flooding, and that "local knowledge has also

indicated that local flooding is occurring within the same river sub-basin" (Section 1.8.3). The absence of a mapped flood zone beneath the site is not the absence of risk.

Appendix N describes the effect on the land occupied by the substation and access tracks as "moderate, adverse and permanent". It records excavation of up to about 3.6 metres and about 9,320 cubic metres of imported stone to cap the platform (Sections 1.4.1.2 and 1.4.1.3). Its Flood Risk Assessment calculates a net runoff increase in a 1 in 100 year storm of approximately 0.016 to 0.185 cubic metres per second, up to about 4.15 percent of the relevant micro-catchment (Section 1.9.1.1). That increase is permanent and falls on a catchment where flooding already occurs. I ask that the applicant be required to show, using evidence gathered in wet winter conditions, that flooding at Inch will not worsen.

3. Site Location and Alternatives

The substation would occupy productive farmland. Food production is becoming an increasingly serious issue as the population grows, and good land should be safeguarded. The EIA Directive as amended by Directive 2014/52/EU, and Schedule 6 of the Planning and Development Regulations 2001 as amended, require an EIAR to describe the reasonable alternatives studied and the reasons for the choice made. I have not found a comparison of alternative sites along the 220kV route. The selection appears to rest on landowner willingness. I also note that the documents contain no letter of support from EirGrid for this location. The applicant's own documents indicate effects on over 300 homes, and a documented comparison of alternatives might have shown a less affected location.

4. Visual Impact

The LVIA uses 24 viewpoints and a 5km study area, and accepts that residential receptors are highly sensitive. Its analysis is nonetheless built around the solar panels. At VP4 and VP5, which concern dwellings, the discussion is of panels and hedgerows rather than the substation. The substation includes a compound of about 22,631 square metres, a 438 square metre control building, a 590 square metre IPP building, two transformers, 2.6 metre fencing, lighting and lightning protection masts of about 18 metres. The LVIA also identifies lattice support structures of 37.5 metres.

The reasoning that panels no higher than 3.4 metres will be screened cannot be applied to structures of 18 and 37.5 metres. The LVIA relies heavily on new planting that needs three years to establish. I ask for ZTV analysis and photomontages from the nearest houses, showing winter views and views at year one and year ten. The scale of this development is too large for this community.

5. Emergency Risk and Fire

Schedule 7 of the Regulations requires consideration of the risk of major accidents and disasters. The EIA Screening Report (Section 3.7.8 and Table 4.1) rates this risk as low. It does not assess a fire at the oil-filled transformers or at the diesel generator tank described in Section 4.3 of the Planning and Environmental Report. The oil volume is not stated. Drawing 300101185-DR-200 notes that bunds are "TBC at Detailed Design" and shows a separator and soakaways. It does not show that oil and firefighting water would be retained rather than passed towards a soakaway.

On access, Drawing 300101185-DR-100B shows the route from the compound to Site Access No. 1 on the R634. The application provides no fire appliance swept path, gate width or turning assessment for that route, and Appendix M relates to Greenhills Energy Park, not this route. Because the station is permanent, these matters cannot be deferred. Local concern about emergency access on these roads is well founded.

Conclusion

For these reasons I respectfully ask the Commission to refuse permission. At a minimum, I ask it to request further information on the matters raised above before any decision is made.

Is mise,

James O'Keeffe