James Tierney
4 Inch na Rince
Inch Killeagh
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. INTRODUCTION AND SCOPE

I am a resident living between 500 metres and 1 km from the proposed site, and I make this Observation on that basis. It concerns only the substation application. The solar farm and battery storage are a separate application. However, the substation is permanent. Section 6.3 of Appendix H states that it will be handed to the network operator and not decommissioned, so it will remain if the solar farm is removed after 40 years. It should therefore be assessed as permanent infrastructure in its own right. I do not object to renewable energy in principle. My concern is whether this development, on this site, has been adequately assessed.

II. HYDROLOGY AND FLOODING

The land in this area is frequently wet and waterlogged. The applicant's own Appendix N confirms that the works are substantial. The substation footprint is approximately 1.8 hectares, and the effect on land occupied by the substation and access tracks is described as "moderate, adverse and permanent". Excavation reaches approximately 3.6 metres. The combined cut and fill for the substation and BESS is approximately 25,013 m3, and approximately 9,320 m3 of imported stone is required to cap the platform.

The site is not within a mapped flood zone. However, Appendix N, Section 1.8.3, accepts that the adjacent Tourig_020 and Glendine_010 watercourses have mapped flooding in low and medium probability zones. It also records that local knowledge indicates flooding within the same river sub-basin. Section 1.9.1.1 reports that a 1-in-100-year event would produce additional runoff of approximately 0.016 to 0.185 m3/s, up to about 4.15 percent relative to the micro-catchment. It also accepts that, without mitigation, flooding could occur on site or downstream.

Absence of a mapped flood zone beneath the platform does not mean absence of risk. I respectfully ask the Commission to require site-specific evidence that surface-water flow paths, groundwater movement and downstream flow timing will not be worsened for neighbouring lands and homes.

III. EMERGENCY RISK AND FIRE

The station will contain two oil-filled transformers, switchgear, and a diesel generator with a fuel tank. The EIA Screening Report, at section 3.7.8, addresses the risk of major accidents by reference to concrete, hydrocarbon spills from construction plant and construction accidents. Neither that section nor section 4.3 of the Planning and Environmental Report assesses a fire at the transformers or the diesel tank. Table 4.1 simply rates the risk as "Low".

Drawing 300101185-DR-200 shows a full-retention separator and soakaways on the surface-water system, and notes "Bunds to be fitted with TBC at Detailed Design". The oil volume is not stated, and there is no demonstration that a bund would hold both oil and firefighting water rather than pass contaminated water towards a soakaway. These matters should be resolved before any decision, not left to detailed design.

On access, the red-line route runs from the compound to Site Access No. 1 on the R634 (drawing 300101185-DR-100B). Because the station will outlast the solar farm, this is the route a fire appliance must use. I can find no swept path analysis, gate width or turning assessment for it in section 4.3, Appendix H or the drawings. Appendix M does not assess this route.

IV. ARCHAEOLOGY

Appendix R is an assessment of the wider renewable energy site, and its avoidance measures are written for solar infrastructure. Its four geophysical anomalies (M1 to M4) are to be preserved by non-intrusive gabion or ballasted foundations and buffers. That cannot apply to this compound. Drawing 300101185-DR-213 shows a cut of 17,304 cubic metres and a fill of 34,669 cubic metres, with a finished level of 109.05 m cut into rising ground.

The May 2025 walkover can only record surface features. The geophysical survey under licence 26R0042 is described at paragraph 3.15 as covering a significant portion of the site, not all of it, and south-western fields were omitted. The applicant does not state that the compound, the tower bases or the access widening lay within the surveyed area.

Paragraphs 6.34 and 6.35 rely on monitoring during construction and preservation in situ "where feasible". On a platform that must be cut to a fixed level, preservation in situ will rarely be feasible, and monitoring then becomes recording before building. Paragraph 3.14 also records that on 10 February 2026 Cork County Council found the archaeological assessment for the solar application inadequate and sought sub-surface assessment before a decision. The permanent cut element should not be held to a lower standard.

Finally, paragraph 4.15 records a hillfort, CO067-001001, 490 m west of the site boundary, in a commanding landscape position. I can find no specific assessment of the effect of a permanent compound, lightning masts and new towers on its setting.

V. VISUAL IMPACT

The LVIA acknowledges that residents are highly sensitive receptors, and states on page 28 that several dwellings lie around the substation. Yet it gives no dedicated residential assessment of the substation. The compound is approximately 22,632 m2 and includes a 438 m2 control building, a 590 m2 IPP building, two transformers, lighting, a 2.6 m fence and lightning masts approximately 18 m high, together with lattice support structures of 37.5 m. At viewpoints VP4 and VP5, which represent nearby dwellings, the discussion concerns solar panels, hedgerows and screening, not the substation.

Screening reasoning for panels of 3.4 m cannot be transferred to 18 m and 37.5 m structures, which may rise above hedgerows. The LVIA also accepts a three-year establishment period for planting. I ask that the Commission require ZTV analysis and photomontages from the nearest homes, showing views at construction, year 3, year 10 and in winter.

VI. LACK OF REGULATION

The EIA Directive, 2011/92/EU as amended by 2014/52/EU, requires the competent authority to carry out its own independent assessment, including of cumulative effects. It should not simply rely on the applicant's documents. National guidance on utility-scale energy infrastructure remains limited. Section 15(1) of the Climate Action and Low Carbon Development Act 2015 requires the Commission to have regard to climate objectives only "insofar as practicable", so landscape, heritage, agricultural land and amenity must be weighed on their merits. I also understand that Cork County Council has found two related applications invalid, which underlines the importance of local planning primacy.

VII. LACK OF PUBLIC CONSULTATION

Appendix A records that direct engagement was confined to approximately 342 houses within 1.5 km, with 42 households within 1 km spoken to directly. Some August letters were returned undelivered because they lacked a resident name. The August sessions at Inch Community Centre were largely pre-booked individual appointments, and I understand that other requests for meetings were not facilitated. Newsletter 2 stated that the layout was still being drafted, and residents were told that photomontages would follow with the application. Consultation on a concept is not informed participation on the scheme finally submitted.

VIII. CONCLUSION

For these reasons, I respectfully ask the Commission to refuse permission. At a minimum, I ask it to seek further information on the matters raised, namely site-specific hydrological evidence, a fire and firewater management assessment with emergency access details, sub-surface archaeological assessment of the compound and a hillfort setting assessment, and a residential visual assessment of the substation.

Is mise,

James Tierney