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P36KN96
26-10-2026

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 in close proximity to the proposed development and wish to make an observation on the application for the 220 kV substation and its associated works. I do not oppose electricity infrastructure in principle; however, I am concerned that the suitability of this location and the potential effects of the permanent development have not been adequately demonstrated.

The Climate Action Plan 2023, while promoting renewable energy, does not envisage the wholesale conversion of prime agricultural land on this unprecedented scale. The agricultural industry in this region represents not merely agricultural activity but a cornerstone of the local rural economy. The applicant has failed to adequately assess the cumulative impact of removing such a significant landholding from agricultural production, particularly in the context of national food security objectives.

1. Hydrology, drainage and flood risk

Appendix N describes a substation footprint of approximately 1.8 hectares and characterises the effect on the land occupied by the station and new or upgraded access tracks as “moderate, adverse and permanent”. It records excavation of up to approximately 3.6 metres and the use of about 9,320 m³ of imported stone to cap the platform.

Although Appendix N, Section 1.8.3, states that the site is outside mapped flood zones, it also identifies indicative flooding on the adjacent Tourig_020 and Glendine_010 watercourses and notes local reports of flooding within the same sub-basin. Section 1.9.1.1 estimates an increase in runoff of 0.016–0.185 m³/s during a 1-in-100-year storm, equivalent to up to approximately 4.15% of the relevant micro-catchment. It further acknowledges that poorly designed drainage could create preferential flow paths and erosion. From local observation, the land is frequently wet and waterlogged.

The absence of a mapped flood zone directly beneath the platform does not, by itself, establish that the works pose no hydrological risk. Drawing 300101185-DR-200 relies on a full-retention separator and soakaways. I ask

the Commission to require site-specific evidence, including winter ground conditions and the suitability of the proposed infiltration system, demonstrating that drainage will operate effectively and will not increase flood risk or adversely affect downstream land and watercourses.

2. Site selection and alternatives

The application does not appear to provide a reasoned comparison of reasonable alternative locations for the 220 kV station. The apparent reliance on landowner availability would not, on its own, demonstrate that the chosen site is the most appropriate in planning and environmental terms. A proper comparison should explain why this location was selected, having regard to residential amenity, drainage, access, landscape and construction impacts. The application documents indicate that more than 300 homes may be affected by the wider area of development; this makes it particularly important that the location and its effects on nearby residents are carefully examined.

I also have concerns about the suitability of the local road network for construction traffic. Appendix M does not provide a sufficiently specific assessment of the route to this station and its access arrangements. The Commission should seek a station-specific traffic assessment covering construction vehicles, haul routes, road capacity, road safety and any required road upgrades.

The application fails to adequately assess displacement effects, barrier effects on wildlife movement, and the cumulative impact on local populations of protected species. Of particular concern is the documented presence of tuberculosis-positive badger setts on the development site. Any relocation programme risks spreading bovine tuberculosis to new areas, with potentially devastating consequences for surrounding dairy herds. The application provides no satisfactory mitigation strategy for this significant biosecurity risk.

The proposed development site lies in proximity to the Tourig River, which forms part of a Special Area of Conservation protecting lamprey species under the EU Habitats Directive. Construction activities present significant pollution risks through sediment runoff, accidental spillages, and altered drainage patterns. The application's assessment of potential impacts on this designated conservation area is inadequate and fails to demonstrate that the proposed development will not adversely affect the integrity of the SAC, as required under the Habitats Directive. The development would also displace the local deer population through extensive fencing, likely forcing animals onto public roads and creating increased traffic hazards. This predictable consequence appears unaddressed in the application documentation.

3. Noise, vibration and earthworks

The submitted noise material does not clearly quantify the effects of the substation platform, its access and the haul route on nearby homes. The report refers to a BS 5228 criterion of 65 dB and to works lasting approximately 16 months, but the application does not establish the predicted noise levels at the nearest dwellings for the substation works specifically. A site-specific assessment should address construction noise and vibration, operating noise, working hours, heavy vehicle movements and enforceable mitigation.

The earthworks figures also appear inconsistent. Drawing 300101185-DR-213 gives a cut of 17,304 m^3 and a fill of 34,649 m^3, while its notes refer to 36,649 m^3 plus 9,490 m^3 of capping stone. Section 5.5.6.1 gives a figure of 25,013 m^3 and states that excavated material will be reused as fill. These quantities need to be reconciled. On the drawing figures, fill exceeds cut, suggesting that imported material and additional heavy vehicle movements may be required. Without reliable quantities and a clear materials-management plan, the construction noise and traffic effects cannot be properly assessed.

4. Environmental assessment and emergency safety

The application relies on an EIA Screening Report rather than an Environmental Impact Assessment Report. I ask the Commission to scrutinise the screening conclusion independently and ensure that it is based on complete, site-specific information about the substation and all associated works, including their likely significant effects and interactions. The planning decision should be supported by a clear, reasoned conclusion on the adequacy of the information submitted.

Section 4.3 identifies up to two 220 kV transformers, switchgear, and a diesel generator and tank. The site notice describes the transformers as oil-filled and bunded, but these details are not consistently specified in Section 4.3. The screening report discusses certain construction accidents and hydrocarbon spills, but I could not identify a specific assessment of a transformer or diesel-tank fire. Drawing DR-200 states that bunds are "to be fitted with TBC at Detailed Design"; the oil volume and arrangements for containing contaminated firewater are not clear. These matters are important for a permanent facility and should be resolved before permission is granted, rather than deferred.

The application also does not appear to include a fire-appliance swept-path assessment from Site Access No. 1 to the transformer bays, or clear details of gate width and turning provision. I ask that emergency access, firefighting arrangements, bund capacity and firewater containment be demonstrated through appropriate plans and a site-specific fire-risk assessment.

Conclusion and request

For these reasons, I respectfully ask the Commission to refuse permission for the proposed 220 kV substation and associated works. Alternatively, before reaching a decision, I ask that further information be required on:

- site-specific winter hydrology, infiltration and drainage performance, including downstream effects;
- a reasoned comparison of reasonable alternative locations;
- construction and operational noise and vibration, together with a station-specific traffic and haul-route assessment;
- reconciled earthworks quantities and a clear materials-management plan;
- the adequacy of the environmental screening assessment;
- transformer and diesel-tank fire risk, bunding and firewater containment, and verified emergency access.

This application seeks permission for an unprecedented scale of development that is inappropriate to its rural setting, inadequately assessed in terms of environmental and social impacts, and contrary to the proper planning and sustainable development of the area. No consideration was given to the local community in way of engagement having a couple of clinics during a working day while this community will be expected to suffer the consequences for 40 years is shameful.

The scale and permanent nature of the proposed station make careful scrutiny of its location, environmental effects, residential amenity and safety essential. I ask that these matters be fully addressed before any decision is made.

Yours faithfully,

Jan Gallagher