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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 write as a landowner whose site lies between 50 and 200 metres from the proposed substation, which I believe makes me the nearest resident to it. My parents gave me this site, close to my childhood home, so that I could build a home on it. I support renewable energy in the right place, but not at the cost of this community. This Observation concerns only the substation, loop-in and access in this application, which is sought permanently and would remain if the solar farm were decommissioned.

Engagement and My Own Site

I have not been contacted by Perigus or EirGrid. My site does not yet have planning permission. I am concerned that a permanent 220kV station beside it could be relied upon against my own future application. I ask the Commission to treat my site as a sensitive receptor and to require the applicant to assess it.

Noise and Vibration

The noise assessment on file is Appendix S, which is titled for the Greenhills Renewable Energy Park. It covers the solar farm, trenching, the battery compound and the substation together, so it is not an assessment of this application. Table 1.1 gives distances only to the energy park boundary (5 m and 8 m), not to the platform on drawing 300101185-DR-213 and not to any house. No distance is given from the compound or the access to any dwelling.

The report's own test at section 1.2.5.1, taken from BS 5228, is 65 dB at a house for more than 10 days in any 15, or more than 40 days in six months. Section 5.5.6.1 of the Planning and Environmental Report puts the substation works at about 16 months, so the duration limb would be met if the level is exceeded. That level has not been calculated for this platform, the access, or the haul route to Site Access No. 1. No EIAR has been submitted, and the conclusions in Chapter 15 and section 3.7.6 of the screening report

relate to the energy park. I have found no assessment of vibration at the nearest homes from vibratory rolling and heavy haulage for these works.

Site Location and Alternatives

The applicant has not shown why this location was chosen. Level ground is available, yet the proposal requires major earthworks. Drawing 300101185-DR-213 gives a cut of 17,304 m3 and a fill of 34,649 m3, while its own notes give 36,649 m3 plus 9,490 m3 of capping stone. Section 5.5.6.1 gives 25,013 m3 and says all excavated material will be reused. These figures cannot be reconciled, and on either drawing figure fill must be imported.

The EIA Directive (2014/52/EU), as transposed through the Planning and Development Act 2000 and the 2001 Regulations, and the EPA's 2022 EIAR guidelines, call for a study of reasonable alternatives and a comparison of their environmental effects. I can find no comparison of alternative sites along the 220kV route, although the documents acknowledge effects on a large number of homes. Site selection appears to rest on landowner agreement. I also note that no letter of support from EirGrid for this location has been provided. Appendix M is the traffic assessment for the energy park and does not assess this route. The roads serving the site are narrow and I do not consider them suitable for heavy abnormal loads.

Hydrology and Flooding

Appendix N records a substation footprint of about 1.8 hectares, excavation of up to about 3.6 metres, and an effect on land that is "moderate, adverse and permanent". It accepts that the site is not in a mapped flood zone, but also that the Tourig_020 and Glendine_010 watercourses have mapped flooding. It states that local knowledge indicates flooding within the same sub-basin. The applicant's Flood Risk Assessment calculates a net increase in runoff in a 1-in-100-year event of 0.016 to 0.185 m3/s, up to about 4.15 percent relative to the micro-catchment. Appendix N accepts that construction could increase flooding on site or downstream if mitigation fails.

These are not small figures for a wet catchment that drains towards communities such as Inch, with its homes, church, graveyard and community centre. I understand that the drainage investigations were carried out in dry summer conditions. The ground is known locally to be waterlogged in winter. I ask that the assessment be repeated under worst-case winter conditions and that cumulative flood risk be addressed.

Water Pollution

The CEMP acknowledges a construction pollution risk and an extensive network of historic and unmapped drains leading to the Tourig and the Blackwater. It also identifies EPA drinking water rivers as sensitive receptors. The Spoil Management Plan (CEMP Appendix B) describes about 13,600 m3 of topsoil and 39,690 m3 of subsoil being handled across 4.71 hectares. The site lies over the Glenville Groundwater Body, mostly of high vulnerability and extreme to the south. Despite this, the design relies on soakaways, including a 5m x 5m x 1.8m infiltration area within the compound.

Two transformers will contain oil. The Water Quality Monitoring Plan accepts that, despite mitigation, a residual risk of accidental spillage remains. I intend to rely on a private well on land at a similar level to the site. I ask that the applicant be required to carry out baseline testing of private wells nearby, to explain what will reach the soakaway and how it will be treated, and to justify infiltration over high-vulnerability

groundwater.

Visual Impact

The LVIA acknowledges that residents are highly sensitive receptors and that several dwellings surround the substation. It does not then provide a dedicated assessment of the substation from those homes. VP4 and VP5 are said to represent residential views, but the discussion concerns solar panels, hedgerows and screening. The substation includes a 2.6 m fence, a 438 m2 control building, a 590 m2 IPP building, transformers, lighting, lightning masts of about 18 m and lattice support structures of 37.5 m. The reasoning that panels of 3.4 m will be screened cannot be transferred to these structures.

The mitigation relies on planting that is in an establishment phase for three years. My view will be of electrical equipment. I ask for a ZTV and photomontages from the nearest dwellings and my site, showing year one, year ten and winter conditions.

Emergency Risk and Fire

The station will contain two oil-filled transformers and a diesel generator and tank. Schedule 7 of the 2001 Regulations requires consideration of the risk of major accidents. Section 3.7.8 and Table 4.1 of the screening report rate that risk as low, but neither assesses a fire at the transformers or the tank. The oil volume is not stated. Drawing 300101185-DR-200 notes bunds as "TBC at Detailed Design" and does not show that firefighting water would be retained rather than passing to a soakaway.

The access in this application is the red route on drawing 300101185-DR-100B to Site Access No. 1 on the R634. No fire appliance swept path, gate width or turning assessment is provided. The access is about 200 metres from the main road, and the roads are narrow. My site is exposed to the wind from the station, and a fire there would be a risk where none exists today.

Cumulative Effect

This area already carries the permitted Lyrenacarriga Wind Farm and a permitted 110kV substation (PA04.309121). The solar farm is before Cork County Council under 26/2133. The Council asked under 25/6876 for a cumulative landscape and visual assessment of the solar farm and the wind farm, and the later submission did not adequately provide one. This 220kV substation was not properly taken into account either. Both substations propose to use the R634 for construction traffic, with potential overlap of heavy and abnormal loads, noise, dust and road safety effects. A separate application should not allow these effects to go unassessed. The Commission should consider the substation together with the permitted and proposed development around it.

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, including site-specific noise and vibration assessment, alternatives, winter hydrology, groundwater and well protection, residential visual assessment, fire and emergency access, and cumulative effects. I would also welcome direct contact from the applicant and EirGrid.

Is mise, Jessica Barry