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28th 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 local resident to make an observation on this application. It concerns only the 220kV substation and loop-in. The solar farm and battery storage are a separate application. However, the substation is to be permanent and will remain after any decommissioning of the solar farm, so it must be assessed on its own merits as a permanent industrial installation.

Water Pollution and the Blackwater SAC

Houses in Inch rely on public mains water for drinking, and the site drains towards the River Tourig and the River Blackwater SAC. The applicant's CEMP identifies the Carignass, Knocknappagh, Ballyleague, Ballygarvin and Youghal Park streams and the Tourig and Glendine rivers, together with historic and unmapped drains (CEMP Appendix F, Section 3.2). The CEMP recognises EPA designated drinking water rivers as sensitive receptors (Sections 3.1 and 3.5). It also places the site largely over the Glenville Groundwater Body, mostly of high vulnerability and extreme in places (Sections 3.3 and 3.4).

Despite this, surface water is to be dealt with by infiltration, including a 5m x 5m x 1.8m soakaway within the compound. Two 33/220kV transformers will contain oil. The Water Quality Monitoring Plan and CEMP Appendix C (Section 11.5.4.4) accept that accidental spillages, leaks and overloading of surface water infrastructure remain a risk despite mitigation. Mitigation can fail, and the consequence would be contamination of drinking water and harm to a European site. I ask the Commission to be satisfied, through Appropriate Assessment under Article 6(3) of the Habitats Directive, that adverse effects on the Blackwater SAC can be excluded. I also ask that the applicant be required to state what water may reach the soakaway and how it is treated beforehand.

Site Location

This proposal converts agricultural land to industrial use. Schedule 6 of the Planning and Development Regulations 2001, as amended, and the EIA Directive require a description of reasonable alternatives studied and the reasons for the choice made. I can find no comparison of other locations along the 220kV route, no stated selection criteria, and no letter of support from EirGrid for this site. The only apparent basis is landowner availability. The applicant's own documents indicate effects on over 300 homes, and

alternatives might have reduced that. The test holes for this site also appear to have been carried out in dry summer conditions in July 2025, whereas this land is known to be wet. The road serving the site is, in my view, poorly suited to heavy goods vehicles, including delivery of two transformers of about 150 tonnes.

Emergency Risk and Fire

I ask what training and equipment the Youghal and Midleton fire services have for a substation fire. The application does not say. Section 4.3 of the Planning and Environmental Report lists two transformers and a diesel generator and tank. Section 3.7.8 of the EIA Screening Report and Table 4.1 rate the risk of major accidents as low, without assessing a fire at the transformers or the diesel tank. Schedule 7 of the Regulations requires consideration of the risk of major accidents and disasters.
Because the station is permanent, these matters should be demonstrated now.

Visual Impact

Hedgerows and ditches in this area have been removed by the landowner, so the site is highly visible. The LVIA accepts that residents are highly sensitive and notes that several dwellings lie around the substation. Yet the analysis at viewpoints such as VP4 and VP5 deals mainly with the solar panels. There is no dedicated residential assessment of the substation. It includes a compound of 22,631.71 square metres, 2.6 m fencing, transformers, lighting and lightning masts of approximately 18 m. Screening arguments (hedging/tree plantation) for panels no higher than 3.4 m cannot be applied to such masts. The LVIA also relies on new planting with a three year establishment period. I ask for ZTV analysis and photomontages from the nearest houses at construction, year 3, year 10 and in winter.

Noise and Vibration

Sound travels across valleys. The noise assessment, Appendix S, was prepared for the Greenhills Renewable Energy Park and not for this application. The distances in Table 1.1, 5 m and 8 m, are to the energy park boundary and not to the platform on Drawing 300101185-DR-213. No distance from the compound or access to any house is given. The BS 5228 threshold of 65 dB has not been calculated for the platform, the access or the haul route, although the works last about 16 months (Section 5.5.6.1).

I am also concerned that vibration from piling, compaction and heavy plant could damage underground tunnels in and around Rath fort. No geophysical survey has been carried out on the substation grounds, so further tunnels may exist. A survey, a vibration assessment and archaeological input should be required before any decision.

Conclusion

For these reasons, I respectfully ask the Commission to refuse permission. At minimum, I ask that further information be requested on the matters raised above.

Is mise,

John Cogan