Joseph & Sandra Burns
Ballycurraginny Killeagh
Co 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,

We wish to make this Observation as a resident living within 5 kilometres from the site. We run a farming and food production business which also hosts farm family events and agri-tourism. Many of our visitors are families from urban areas who visit to enjoy and escape to the countryside. We will lose business from this as customers will not want to visit from urban areas to look at a substation. This goes against what our business stands for. This Observation concerns only the substation and loop-in. Because the substation is to remain permanently, including after any solar farm is decommissioned, it must be assessed on its own long-term merits.

Wildlife and Deer

A substantial deer population uses the surrounding land. A 2.6 metre perimeter fence around a compound of about 22,632 square metres, together with operational noise and lighting, risks displacing deer and cutting off their movement routes. Displaced deer will concentrate on neighbouring farmland, and we already suffer deer damage to our horticultural crops. I ask that the applicant be required to assess the effect on deer and other fauna, including movement corridors, noise and lighting, and to show what mitigation is proposed.
2 years ago, we had 1 acre of beetroot which is grown to make our veg crisps eaten in 5 days on our farm by deer. If this development goes ahead our already existing problem could potentially put our crisp business in jeopardy. This would have a knock-on effect of loss of jobs - is this what we want in our local area all because of a substation development. We have included a picture of deer on our farm in appendix1.

Fire Safety and Emergency Risk

This is my priority concern. Section 4.3 of the Planning and Environmental Report (printed page 57) lists two 220kV transformers, a diesel generator and a fuel tank. The site notice describes the transformers as oil-filled and within bunded enclosures. Schedule 7 of the Planning and Development Regulations 2001, as amended, requires consideration of the risk of major accidents and disasters. The EIA Screening Report applies that criterion at section 3.7.8, but it addresses concrete, construction plant hydrocarbon

spills and construction-site accidents. It does not assess a fire at the oil-filled transformers or the diesel tank, yet Table 4.1 rates the risk as "Low". Appendix H does not fill that gap.

Drawing 300101185-DR-200 states that bunds are "TBC at Detailed Design". The oil volume is not given, and the drawing does not show that a bund would retain transformer oil together with firefighting water rather than pass it through the separator to the soakaways. No firefighting water supply is described.

Access is also unresolved. The route from Site Access No. 1 on the R634 is shown on drawing 300101185-DR-100B, but there is no fire appliance swept path, gate width or turning assessment. Drawing 300101185-DR-210 is only a gate and fence detail, and Appendix M is the traffic assessment for the wider Greenhills Energy Park, not this route. The local roads are rural and narrow. In my view the local fire and emergency services are not equipped or trained for a fire at a plant of this kind. The Commission should be satisfied, on evidence, that the fire authority has been consulted and that an appliance can reach the transformer bays in all weather.

Water Pollution

The site is crossed by or drains to the Carignassa, Knocknappagh, Ballyleague, Ballygarvin and Youghal Park streams and the Tourig and Glendine rivers, which flow to the River Blackwater, a European designated site, and then the Celtic Sea. The applicant's own CEMP acknowledges the pollution risk. The Spoil Management Plan (CEMP Appendix B) describes about 13,600 cubic metres of topsoil and 39,690 cubic metres of subsoil being moved to recontour 4.71 hectares, which exposes a large area to rainfall and silt run-off. The CEMP also records an extensive network of historic and unmapped drains (Appendix F, section 3.2), EPA designated drinking water rivers as sensitive receptors (sections 3.1 and 3.5), and a largely High groundwater vulnerability setting, extreme in places, above the Glenville Groundwater Body.

Against that background, the proposal to use infiltration and soakaway drainage, including a 5m x 5m x 1.8m infiltration area within the compound, is of real concern to me as a farmer relying on groundwater. The Schedule of Mitigation (CEMP Appendix C, section 11.5.4.4) accepts that a risk of accidental spillage and leakage remains. I ask the Commission to require clarity on what water may reach the soakaway, how it is treated beforehand, and what happens after a transformer or bund failure. Given the hydrological link to the Blackwater, Appropriate Assessment under Article 6(3) of the Habitats Directive must be rigorous and free of reasonable scientific doubt.

Visual Impact and Amenity

The LVIA recognises that residents are highly sensitive receptors and notes several dwellings around the substation (page 28). However, its viewpoint analysis, for example at VP4 and VP5, concentrates on the solar panels, which will not exceed 3.4 metres. The substation includes a 438 square metre control building, a 590 square metre IPP building, transformers, lighting masts and lightning protection masts of about 18 metres. The LVIA also refers to 37.5 metre lattice structures. These will rise above hedgerows that screen low panels, yet no dedicated residential visual assessment or ZTV analysis is provided for them. The LVIA also relies on new planting, which it accepts has a three-year establishment phase. The Commission should ask what residents will see at construction, after three years, after ten years and in winter.

For a business built on rural tranquillity and landscape, an industrial installation of this character cuts directly across what we offer, and the effect on tourism amenity has not been properly assessed.

Public Consultation

The applicant's Summary of Engagement (Appendix A) shows that direct contact was limited to about 342 houses within 1.5 kilometres, with 42 households spoken to directly. It admits that some letters were returned undelivered, and I can say that not every house received the newsletters. The August sessions at Inch Community Centre were largely pre-booked individual appointments, and other requests for meetings were not facilitated. Newsletter 2 confirmed that the layout was still being drafted, and residents were told photomontages would follow with the application. Many people therefore engaged before the final design and assessments existed. Those of us beyond 1.5 kilometres, were not directly invited at all.

Regulation and Environmental Impact Assessment

The Commission is the competent authority under Directive 2011/92/EU as amended by Directive 2014/52/EU. It must reach its own independent conclusion on significant effects, including cumulative effects, and cannot simply adopt the applicant's commercially prepared material. The absence of national guidance specific to utility-scale energy infrastructure makes that independent scrutiny more important. Climate objectives, while important, do not displace the need to weigh landscape, ecology, amenity, agriculture and infrastructure constraints.

Site Selection and Alternatives

Schedule 6 of the 2001 Regulations requires a description of the reasonable alternatives studied, with reasons for the choice made having regard to environmental effects. I could not identify any comparison of alternative substation locations along the 220kV route. The site appears to have been driven by landowner availability rather than a transparent set of criteria such as residential proximity, flood and wetland conditions, access and emergency response. Drainage work that appears to rely on dry-season conditions does not reflect how wet this land can be. I am also not aware of any letter of support from EirGrid for this specific location.

Conclusion

For these reasons, I respectfully ask the Commission to refuse permission. If the Commission is minded otherwise, I ask that it first seek further information on the fire and firefighting-water strategy, emergency access, drainage and groundwater protection, deer and wildlife effects, residential visual impacts, and the assessment of alternatives.

Thank you for considering this Observation.

Is mise,

Joseph Burns

Appendix

1. **Dated Picture from Security camera.**

