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30th 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 live between 1 and 5 km from the proposed development and wish to make this Observation. It concerns only the 220kV substation, loop-in and access shown in red on drawing 300101185-DR-100B. Section 6.3 of Appendix H states that the station will be handed to the network operator and will not be decommissioned. It must therefore be assessed as permanent infrastructure in its own right, whatever becomes of the separate solar application.

1. Archaeology and Cultural Heritage

Our area is rich in historic settlement, including vernacular cottages and farm buildings, a ringfort and souterrain at Rath, Ardagh Church, the Tuck Mill stone walls, Inch Bridge and historic field boundaries. The Cork County Development Plan 2022-2028 seeks to realise the potential and value of Killeagh's heritage, and I ask that this be respected.

Appendix R assesses the wider renewable energy site. Its avoidance measures, namely non-intrusive gabion or ballasted foundations and stand-off buffers around anomalies M1 to M4, are solar measures. Drawing 300101185-DR-213 shows the compound formed by cut and fill, with 17,304 cubic metres cut and 34,669 cubic metres filled, to a finished level of 109.05 m. A platform of that kind cannot sit on gabion baskets.

The application does not show that the compound, tower bases or widened access lie within the geophysical survey (licence 26R0042). Paragraph 3.15 of Appendix I says only a significant portion of the site was covered, and south-western fields were omitted. The May 2025 walkover recorded surface features only. Paragraphs 6.34 and 6.35 of Appendix R rely on monitoring during construction, with preservation in situ only "where feasible". On a platform that must be cut to level, this will in practice mean recording and then building.

Paragraph 3.14 records Cork County Council's view of 10 February 2026 that sub-surface archaeological assessment was required for the solar application. The element involving the deepest excavation should

not be held to a lower standard. The hillfort CO067-001001 in Rath townland, 490 m west of the site, is described at paragraph 4.15 as occupying a commanding position, yet no specific setting assessment addresses a permanent compound, lightning masts and new towers.





2. Water Pollution

The Carignass, Knocknappagh, Ballyleague, Ballygarvin and Youghal Park streams, and the Tourig and Glendine rivers, drain to the River Blackwater, a European designated site. The applicant's own CEMP acknowledges the risk of construction pollution and notes EPA designated drinking water rivers as sensitive receptors (CEMP sections 3.1 and 3.5).

The CEMP Spoil Management Plan (Appendix B) refers to about 13,600 cubic metres of topsoil and 39,690 cubic metres of subsoil and the recontouring of 4.71 hectares. This exposes a large area to rainfall and silt-laden runoff. Appendix F describes an extensive network of historic and unmapped drains, which provides a pathway downstream.

The site lies largely over the Glenville Groundwater Body, a locally important aquifer, with high groundwater vulnerability and extreme vulnerability to the south. Despite this, the compound relies on soakaway and infiltration, including a 5m x 5m x 1.8m infiltration area (CEMP sections 3.3 and 3.4). Two transformers will hold oil on site. Appendix C (section 11.5.4.4) accepts that a risk of accidental spillage remains during operation, despite mitigation. The Commission should require clear information on what water may reach the soakaway and how it is treated beforehand.

3. Hydrology and Flooding

I do not oppose renewable energy in principle. My concern is the suitability of this location for permanent high-voltage infrastructure. Appendix N records a substation footprint of about 1.8 hectares, excavation to about 3.6 metres, 9,320 cubic metres of imported stone, and an effect on land that is "moderate, adverse and permanent" (pp.28-29).

The site is outside mapped flood zones, but Appendix N accepts that the adjacent Tourig_020 and Glendine_010 watercourses have mapped flooding. It also records that local knowledge indicates flooding within the same sub-basin (section 1.8.3). The applicant's Flood Risk Assessment calculates a 1-in-100-year runoff increase of 0.016 to 0.185 cubic metres per second, up to 4.15 per cent of the micro-catchment (section 1.9.1.1). The absence of a mapped flood zone beneath the compound is not the same as the absence of downstream risk. The applicant should demonstrate by site-specific evidence that flow paths, groundwater movement and storage will not be altered so as to worsen flooding elsewhere. The below images show the devastating result post Babet flooding 2023 on the bridge closest to the proposed substation and my local property.





4. Emergency Risk and Fire

The station will include up to two 220kV transformers, a diesel generator and a fuel tank. Schedule 7 of the Planning and Development Regulations 2001, as amended, requires consideration of the risk of major accidents and disasters. Section 3.7.8 of the EIA Screening Report addresses construction spills and site accidents, and Table 4.1 rates the risk as "Low". Neither it nor section 4.3 of the Planning and Environmental Report assesses a fire at the oil-filled transformers or the diesel tank.

Drawing 300101185-DR-200 notes "Bunds to be fitted with TBC at Detailed Design". The oil volume is not stated, and nothing shows that bunds would retain oil together with firefighting water rather than pass it to the surface-water system and soakaways. No firefighting water supply is described.

For emergency access, the red-line route runs from Site Access No. 1 on the R634. The application contains no fire appliance swept path, gate width or turning assessment for that route, and Appendix M does not assess it. As the station is permanent, these matters should be demonstrated now and not left to detailed design.

5. Biodiversity

The area is home to deer, badgers, foxes, bats, buzzards and frogs. A permanent fenced compound, new access and towers would change the landscape, restrict the movement of wildlife, reduce numbers and disturb habitat. I ask that the Commission be satisfied that these effects, and the effects of any polluted runoff reaching the Blackwater catchment, have been fully assessed.



Conclusion

For these reasons I respectfully ask the Commission to refuse permission. At a minimum, I ask that it request further information on the archaeological assessment of the compound and access, the drainage and groundwater protection measures, the flood effects downstream, and fire and emergency access arrangements.

Is mise,
Lavinia Mossop