Lee Valentine
Barnaviddane
Inch
Killeagh
Co. Cork

1st November 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 reside approximately 1.5 km from the proposed site and am a retired electricity and energy broker. I do new grid infrastructure or renewable energy in principle. This Observation my concerns with regards only this 220kV substation, loop-in and access application.

LACK OF PUBLIC CONSULTATION

The engagement relied upon is Appendix A, Summary of Engagement 2025, which concerns the wider Greenhills Renewable Energy Development and not this substation. It records a February 2025 newsletter to about 342 houses within 1.5 km, with 42 households within 1 km spoken to directly. It also records an August 2025 mailing to 334 houses, some returned undelivered by An Post because no resident name was included. No reason is given for the 1.5 km limit. Much of the August engagement at Inch Community Centre was pre-booked individual appointments rather than open meetings, and Newsletter 2 confirmed the layout was still being drafted. To my knowledge the applicant has undertaken no engagement since acquiring the project in 2026. In my observation, the notices beside the proposed entrance on the R634 cannot be read from a passing vehicle. That road has an 80 km/h limit, no footpath and no safe place to stop. Effective public participation has not been achieved for this application.





SUBSTATION ASSESSED APART FROM ITS PURPOSE, AND LOCATION

The substation exists to connect a solar farm that is the subject of a separate, undetermined application. Yet the supporting material is largely prepared for the wider energy park, including the traffic assessment (Appendix M), the noise assessment (Appendix S) and the archaeology assessment (Appendix R). Drawing 300101185-DR-100B records that the access track and solar park are a separate application, while the red-line access from the R634 is what this application seeks. Treating the two in this way risks incomplete assessment of cumulative effects, and a grant here could prejudge the later case. I ask the Commission to consider whether this is properly before it as a stand-alone development, and whether an EIAR is required, since only a screening report has been submitted.

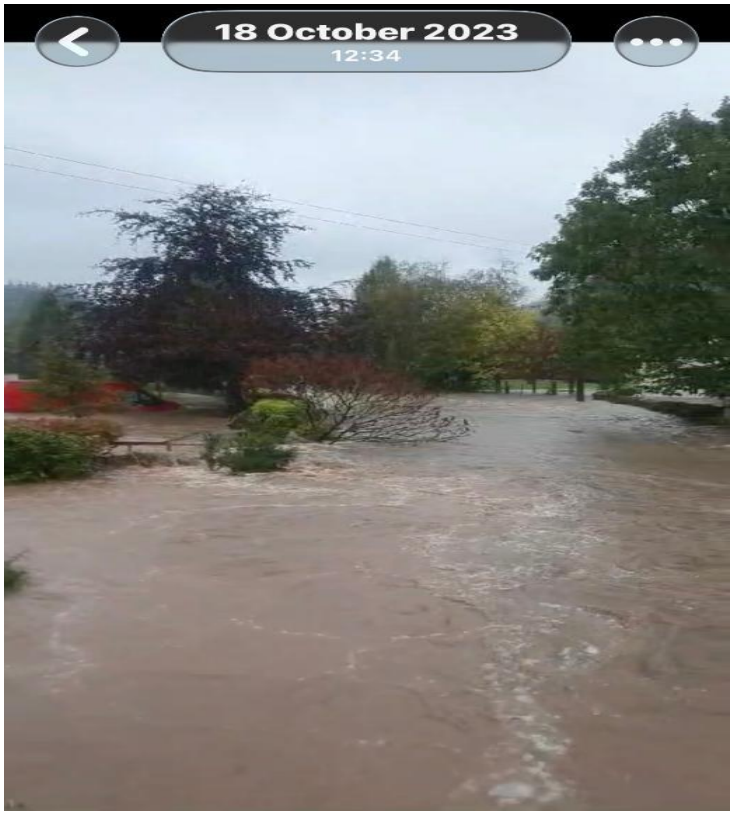
The land is agricultural under the Cork County Development Plan 2022-2028 and the proposal is industrial in character. I can find no comparison of reasonable alternative sites along the existing Knockraha-Cullenagh 220kV line, and no selection criteria other than landowner availability.

WATER POLLUTION & PRIVATE WELLS

Most households here rely on private wells and local watercourses. The CEMP acknowledges a construction pollution risk. It identifies EPA-designated drinking water rivers as sensitive receptors and a drainage pathway to the River Tourig and on to the River Blackwater, a European site. The site lies largely over the Glenville Groundwater Body, mostly of high vulnerability and extreme in the south. Yet the design relies on soakaways, including a 5 m by 5 m by 1.8 m infiltration area, and the CEMP routes oil and fuel through an interceptor to a soakaway. The Water Quality Monitoring Plan itself accepts that a risk of accidental spillage remains. Earthworks of about 13,600 m3 of topsoil and 39,690 m3 of subsoil across 4.71 hectares will also expose ground to rain and generate sediment. I ask the Commission to require a site-specific hydrogeological assessment and to consider Appropriate Assessment under Article 6(3) of the Habitats Directive.

HYDROLOGY / FLOODING RISK

The site is adjacent to the River Tourig. Storm Babet in 2023 flooded areas less than a kilometre downstream, washed away roads, damaged homes and closed the local church for months. Appendix N states that the effect on land occupied by the substation and tracks will be "moderate, adverse and permanent". It records a 1.8 hectare substation footprint and excavation of about 3.6 m. It calculates a net increase in 1-in-100-year runoff of 0.016 to 0.185 m3/s, up to 4.15 percent of the micro-catchment. It also acknowledges mapped flood zones on the adjacent Tourig and Glendine watercourses, and local knowledge of flooding in the same sub-basin. That the platform lies outside a mapped zone does not show that downstream flooding will not worsen. I understand some site investigation was carried out in dry summer conditions, whereas this ground is frequently waterlogged. A flood risk assessment for the permanent station, tested against winter conditions and the 2023 event, is needed









LACK OF DETAILED ARCHAEOLOGY ASSESSMENT

A hillfort**, CO067-001001** lies in Rath townland about 490 m west of the site boundary. Appendix R assesses the wider site and relies on solar-farm measures, namely gabion or ballasted foundations, non-intrusive and reversible. These cannot apply to a compound which drawing 300101185-DR-213 shows formed by a cut of 17,304 m3 into rising ground, to a finished level of 109.05 m. The geophysical survey under licence 26R0042 covered only a significant portion of the site, and the applicant does not state that the compound, tower bases or widened access fell within it. Paragraphs 6.34 and 6.35 defer to monitoring during construction, with preservation in situ only "where feasible". That is unrealistic once a platform has been approved. Appendix R, paragraph 3.14, records Cork County Council's comment of 10 February 2026 that the solar application was incomplete because sub-surface archaeology had not been assessed. The same standard should apply here, consistent with the archaeological heritage objectives of the County Development Plan. Appendix R also contains no specific assessment of the effect of a permanent compound, lightning masts and towers on the setting of the hillfort.

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NOISE AND VIBRATION ISSUES

Appendix S is titled for the Greenhills Renewable Energy Park and covers solar, battery and substation works together. The closest distances in Table 1.1, 5 m and 8 m, are to the energy park red line, not to this compound or access, and no distance from either to any house is given. Section 1.2.5.1 applies a BS 5228 test of 65 dB, and section 5.5.6.1 puts the works at about 16 months, yet no level has been calculated for this platform, access or haul route. Fill figures are also inconsistent. Drawing DR-213 shows a cut of 17,304 m3 and a fill above 34,000 m3. Section 5.5.6.1 gives 25,013 m3 and says all excavated material will be reused. Imported fill and 400 mm of capping stone therefore imply considerable heavy traffic. No night-time or tonal assessment of the operational transformers has been provided for this station.

EM**ERGENCY RISK AND FIRE**

The station includes up to two oil-filled transformers, a diesel generator and a fuel tank, and the application refers to battery and control rooms. Clarity is needed on whether any battery storage is within the control building. 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 and Table 4.1 of the EIA Screening Report rate that risk as low but do not assess a fire at the transformers or the diesel tank. Drawing 300101185-DR-200 states that bunds are "TBC at Detailed Design". No oil volume is stated, and the drawing does not show firefighting water being retained rather than passing through the separator to a soakaway. There are no hydrants locally and no firefighting water supply is described. No fire appliance swept path, gate width or turning assessment is provided for the route from Site Access No. 1 on the R634. Contaminated run-off from a fire would reach drinking water sources and rivers quickly.

CONCLUSION

For these reasons, I respectfully ask the Commission to refuse permission. At a minimum, I ask that further information be requested on the following:
- a stand-alone traffic, noise and vibration assessment of this substation and its access
- pre-determination geophysical and archaeological investigation of the compound, towers and access
- site-specific flood risk and hydrogeological assessment

- a fire safety and emergency access assessment
- a comparison of reasonable alternative sites

Thank you for considering this Observation.

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Lee Valentine