Liam & Nicola Power
Ballyglavin
Youghal
Co. Cork

21st 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 live on a farm around 500 metres from the proposed substation. This Observation concerns only the 220kV substation, loop-in and access in this application. The solar farm and battery storage are a separate application. However, the substation is sought permanently and would remain if the solar farm were decommissioned after 40 years. It must therefore be assessed on its own merits as a permanent installation.

(a) Site Location and Alternatives
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The site lies in a quiet rural area with unspoilt views across the valley of Inch. A permanent 220kV compound and new loop-in towers would change that landscape for good. The EIA Directive 2014/52/EU, Schedule 6 of the Planning and Development Regulations 2001, as amended, and EPA guidance on Environmental Impact Assessment Reports all require reasonable alternatives to be studied and compared. We have found no comparison of alternative substation locations along the 220kV route. Selection appears to rest on landowner agreement rather than clear, stated criteria. The applicant's own documents indicate a significant impact on over 300 homes, and alternatives might have reduced this. We also note that no letter of support from EirGrid specific to this site appears to be on file.

(b) Noise and Vibration
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Appendix S is written for the Greenhills Renewable Energy Park as a whole. The 5 m and 8 m distances in Table 1.1 are to the energy park boundary, not to the platform on drawing 300101185-DR-213. No distance from the compound or access to any house is given. 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 15 or 40 days in six months. Section 5.5.6.1 puts the works at about 16 months, so the duration limb would be met. The level has not been calculated for this platform, this access or the haul route to Site Access No. 1.

The fill figures are also inconsistent. Drawing DR-213 shows fill exceeding cut, with 17,304 cubic metres of cut and a different fill figure in its notes. It also shows 9,490 cubic metres of capping stone. Section 5.5.6.1 gives 25,013 cubic metres and says all excavated material will be reused. These cannot be reconciled. Imported material and transformers of about 150 tonnes will pass along the access and the R634. We keep livestock, and this burden on our family, our animals and the wider community has not been properly assessed.

(c) Water Pollution

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We rely on well water, and we are seriously concerned about contamination. The CEMP identifies the Glenville Groundwater Body, which it describes as a locally important aquifer. It classes most of the site as high groundwater vulnerability, and extreme in places to the south. It also records an extensive network of historic and unmapped drains leading to the River Tourig and the Blackwater, a European designated site. The works involve recontouring about 4.71 hectares, with figures of about 13,600 cubic metres of topsoil and 39,690 cubic metres of subsoil in the Spoil Management Plan. The design relies on soakaways, including a 5m by 5m by 1.8m infiltration area, while two oil-filled transformers will be on site. Drawing 300101185-DR-200 states bunds are "TBC at Detailed Design". The applicant's own Water Quality Monitoring Plan accepts a residual risk of spills and leaks. The Commission should require a full assessment of the pathway to groundwater and private wells.

(d) Archaeology

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Our area is rich in forts and associated archaeology, which should be preserved as a priority. Appendix R relies on non-intrusive gabion or ballasted foundations and stand-off buffers, which are solar measures. Drawing DR-213 shows a compound formed by cut and fill, which cannot sit on gabions. Paragraph 3.15 of the geophysical survey says it covered only a significant portion of the site, and the applicant does not state that the compound, tower bases or access widening were surveyed. Paragraphs 6.34 and 6.35 leave monitoring during construction and preservation in situ "where feasible", which will not be feasible once a platform is approved. Cork County Council has already said, on the solar application, that sub-surface assessment was required before a decision. The hillfort CO067-001001, 490 m west of the site boundary, is described at paragraph 4.15 but its setting is not specifically assessed against a permanent compound and new towers.

(e) Emergency Risk and Fire

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The station will contain up to two oil-filled transformers, switchgear, and a diesel generator and tank. Section 3.7.8 of the EIA Screening Report and Table 4.1 treat major accident risk as low. Neither addresses a fire at the transformers or the diesel tank. The oil volume, bund capacity and firewater retention are not stated, and drawing DR-200 shows a separator and soakaways. The application contains no fire appliance swept path from Site Access No. 1 to the transformer bays, and no gate width or turning assessment. Appendix M is an energy park traffic assessment, not an assessment of this route. The surrounding roads are very narrow and not suited to fire engines. No evacuation plan has been provided for residents. Because the station is permanent, these matters must be demonstrated now.

(f) Entrance onto the R634

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The proposed entrance lies where the R634 is only just straightening out after a very bad bend on the western approach near our home. Slow, heavy or turning vehicles there risk serious collisions. We ask that

sight lines, speeds and swept paths for this entrance be independently assessed.

Conclusion
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For these reasons, the application does not demonstrate that a permanent 220kV substation is properly sited or safe. We respectfully ask the Commission to refuse permission. At a minimum, we ask it to seek further information on alternatives, noise at the nearest houses, groundwater protection, archaeology, fire and emergency access, and the R634 entrance.

Is mise,

Liam & Nicola Power