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P36KN79

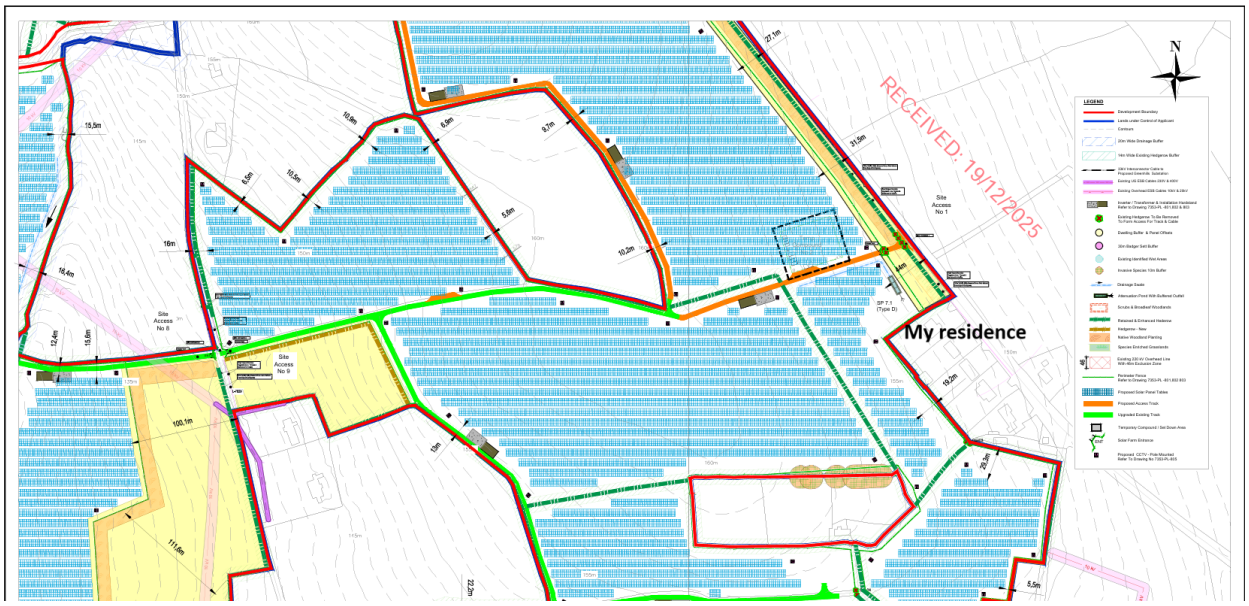
28th October 2026

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 am a local resident and I make this Observation on the above application. I live less than 50 metres from Site Access No. 1 on the R634, and one of the proposed solar compounds is less than 100 metres from my home. This Observation concerns the substation and loop-in only. Section 6.3 of the application states that the station and loop-in will be handed to the network operator and will not be decommissioned. They must therefore be assessed as permanent infrastructure, whatever happens to any solar farm. I have included at the end of my observation photomontages taken on behalf of Orsted/Perigus of my home and the proposed solar farm.



Location and Alternatives
The substation is proposed on agricultural land close to several dwellings, including mine, and beside a busy regional road. I understand that Cork County Council indicated at pre-application meetings that the solar farm development should be set back about 80 to 100 metres from dwellings. The compound off the R634 is less than 100 metres from my home as is the solar panels. The panels are less than 50m from my home.

The EIA Directive (2011/92/EU, as amended by 2014/52/EU) and Schedule 6 of the Planning and Development Regulations 2001, as amended, require an EIAR to describe the reasonable alternatives studied and the main reasons for the option chosen, having regard to environmental effects. I could not find a comparison of alternative locations along the 220kV route in the documents. The choice of site appears to rest on landowner availability, which is a commercial convenience and not a planning criterion. The applicant's own material indicates significant effects on more than 300 homes. A genuine comparison of sites might have shown a location with far less residential impact.

Zoning and Policy
The lands are zoned agricultural and not industrial. A permanent 220kV station in this location changes the character of the area and creates a grid connection point that may attract further industrial proposals. Section 15(1) of the Climate Action and Low Carbon Development Act 2015 imposes a qualified duty to act so far as practicable. The climate benefit of renewable energy does not remove the need to weigh landscape, amenity, agricultural land, cumulative effects and the zoning context. As competent authority, the Commission must carry out its own independent assessment and should not rely uncritically on documents prepared for the applicant.

Fire and Emergency Risk
Section 4.3 of the Planning and Environmental Report (printed page 57) lists up to two 220kV transformers, switchgear, and a diesel generator and tank. The site notice describes the transformers as oil-filled and bunded, but section 4.3 does not use those words. Schedule 7 of the 2001 Regulations requires consideration of the risk of major accidents and disasters. The EIA Screening Report addresses this at section 3.7.8 and in Table 4.1, which rates the risk as "Low". That analysis deals with concrete, hydrocarbon spills from construction plant and construction-site accidents. It does not assess a fire at the transformers or the diesel tank. Appendix H also does not contain such an assessment.

Drawing 300101185-DR-200 shows a full-retention separator and soakaways on the surface-water system, and notes "Bunds to be fitted with TBC at Detailed Design". The oil volume is not stated on the site notice, in section 4.3 or on that drawing. Nothing shows that a bund would hold transformer oil together with firefighting water, rather than pass contaminated water to a soakaway. Rainwater harvesting is shown, but it is not described as a firefighting supply. These matters should be demonstrated now and not deferred.

Access and Road Safety
The access sought is the internal road running north from the compound and then east to Site Access No. 1 on the R634. Because the station will remain, this is the route a fire appliance must use. The application does not include a fire-appliance swept path, a stated gate width or a turning assessment. Drawing 300101185-DR-210 is only a gate and fence detail. Appendix M is the Greenhills Energy Park traffic assessment and does not assess this route. Section 1.3.3 refers to delivery of two transformers of about 150 tonnes, yet the local road network has not been shown to be suitable.

The R634 carries through traffic on the Youghal, Tallow, Lismore and Fermoy routes. Speeding is an existing problem and a new 80 km/h speed limit sign has recently been erected. A new entrance close to my home, and any tall boundary planting affecting visibility of signage or sightlines, could add to

collision risk on a road where I believe the safety record is a real concern.

Hydrology and Flooding

My private well and my newly installed septic tank lie close to the wider site, and the field has previously delivered runoff towards my property. Land behind my home is frequently wet and waterlogged. Appendix N records a substation footprint of about 1.8 hectares and describes the effect on land as "moderate, adverse and permanent". It records excavation to about 3.6 metres, combined cut and fill of about 25,013 cubic metres for the substation and BESS, and about 9,320 cubic metres of imported stone to cap the platform (sections 1.4.1.2 and 1.4.1.3).

The site is outside mapped flood zones, but Appendix N acknowledges mapped flooding on the adjacent Tourig_020 and Glendine_010 watercourses and states that local knowledge indicates flooding within the same sub-basin (section 1.8.3). The applicant's own Flood Risk Assessment calculates an increase in 1-in-100-year runoff of about 0.016 to 0.185 cubic metres per second, up to about 4.15 percent of the relevant micro-catchment (section 1.9.1.1). The report accepts that without mitigation this could cause flooding on site or downstream. Drainage investigations, including Appendix B, appear to have been carried out in dry summer conditions and not in the least favourable winter conditions. The application does not make clear whether the attenuation features will be open surface ponds, nor how they will protect neighbouring wells and septic systems. The Commission should require winter-condition data and a demonstration that the works will not worsen flooding or contaminate groundwater.

Residential Amenity

Operational noise, including the tonal hum associated with transformers and electrical plant, should be shown to have been assessed at my property. Construction traffic from early morning would harm the quiet I presently enjoy. A camera is shown on the corner boundary of my property. Any CCTV should be shown with its field of view, so that my home and family are not overlooked.

Conclusion

For these reasons, the application does not adequately demonstrate that this is the correct location, that fire and emergency risks can be managed, or that flooding and water pollution risks are controlled. I respectfully ask the Commission to refuse permission. At a minimum, I ask the Commission to request further information on alternatives, fire and bund design, emergency access, winter hydrology and noise.

Is mise,

Liam Burns



Picture 1: The current view of my home in Ballydaniel.



Picture 2: Proposed Panel Boundary in yellow. Picture does not include the new proposed site entrance 1 in the photomontage making this photomontage inaccurate.



Picture 3: Proposed panelling without proposed new hedging or tree planting included or the new site entrance 1.



Picture 4: This is the image of my home post solar farm construction. Site entrance 1 will be a permanent entrance for the substation yet does not feature in Macro works assessment. The planting looks to be well over the 3m suggested as part of the landscaping assessment. I have concerns regarding the accuracy and reliability of the photomontages.