Liam Fitzgerald
Rath
Inch
Killeagh
Co. Cork.

17th 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 farmer and the boundary of my land is less than 50 from the proposed substation site. The site is just outside the ditch of my home, and this development would be very close to both my home and my livelihood. It is a huge site and a huge proposed development for this rural area.

This Observation concerns the substation application only. 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 as a permanent installation in its own right.

1. Noise and Vibration

My livelihood depends on livestock. I am very worried about the noise and vibration this substation would cause and the effect it would have on my animals. Any harm to my livestock would directly impact my livelihood. I am aware of studies indicating that substations can adversely affect cattle and wildlife. The development would also drive wildlife into other areas. I already have serious problems with deer breaking wires and damaging boundaries, and displacement of wildlife by this development would make that worse. The application contains no assessment of these effects.

The only noise report, Appendix S, is titled for the Greenhills Renewable Energy Park and covers the solar farm, battery compound and substation together. Its closest distances in Table 1.1, 5 m and 8 m, are to the energy park boundary, not to the platform on drawing 300101185-DR-213. It gives no distance from this compound or access to any house. Chapter 15 of the Planning and Environmental Report and section 3.7.6 of the EIA Screening Report rely on that appendix, and there is no EIAR.

The report's own BS 5228 test is 65 dB at a house for more than 10 days in any 15, or more than 40 days in six months. Section 5.5.6.1 puts these works at about 16 months, but the level has not been calculated for this platform or access. The 23 to 45 dB column in Table 1.28 is not that calculation.

The fill figures are also inconsistent. Drawing DR-213 gives a net fill of 17,345 m3 in its summary, 36,649 m3 in its notes and a further 9,490 m3 of capping stone. Section 5.5.6.1 gives 25,013 m3 and says all excavated material will be reused. On the drawing's figures fill exceeds cut, so material must be imported, with associated haulage on the R634 and the access to Site Access No. 1. That traffic has not been assessed for noise or vibration.

2. Emergency Risk and Fire

Section 4.3 lists up to two 220kV transformers and a diesel generator and tank. The site notice describes the transformers as oil-filled and bunded. 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 Screening Report addresses concrete, construction plant spills and site accidents, and Table 4.1 rates the risk as low. Neither it nor section 4.3 assesses a fire at the transformers or the diesel tank.

Drawing DR-200 states "Bunds to be fitted with TBC at Detailed Design" and is marked as subject to change. I cannot find the oil volume stated in the site notice, section 4.3 or that drawing. The drawing shows a full-retention separator and soakaways, but does not show that firefighting water would be retained in a bund rather than passing to a soakaway.

I am concerned about the chemicals and toxins that would be released if the substation caught fire. I am also concerned that those chemicals and contaminated firefighting water could reach the River Tourig, which I understand to be linked to local water supplies and the drinking water source for Youghal. This risk should be assessed before any permission is considered.

Emergency access is also unaddressed. Because the station remains permanently, the red route on drawing DR-100B to Site Access No. 1 is the route a fire appliance must use. There is no swept path, gate width or turning assessment for it. Appendix M is the Greenhills traffic assessment, not an assessment of this route.

3. Cumulative Effect

Taken together, this amounts to too much industrial development for this rural area. Cork County Council, in dealing with Planning Ref. 25/6876, asked for a cumulative assessment of the proposed solar farm and the permitted Lyrenacarriga Wind Farm. I understand the later submission under Ref. 26/2133 did not adequately provide it, and that this substation was not properly considered in it.

A 110kV substation has already been permitted under PA04.309121, approximately 4 km from this site. Construction traffic for both substations is proposed to use the R634, creating potential cumulative effects on road safety, noise, dust and local residents where programmes overlap. Splitting the proposals across separate applications should not allow these combined effects to go unassessed.

4. Site Location and Alternatives

The site is productive farmland, and productive farmland should not be used for industrial development. With so much talk of land exiting food production, it would be wrong to use this agricultural land for permanent industrial infrastructure. The development would turn this agricultural area into an industrial one.

The application does not demonstrate a comparison of reasonable alternative sites along the 220kV route. The EIA Directive 2011/92/EU, as amended by 2014/52/EU, and Schedule 6 of the 2001 Regulations require information on reasonable alternatives. The apparent basis for selection is landowner availability,

which is not a planning rationale. The applicant's own documents indicate a significant effect on a large number of homes, and alternatives might have reduced that. I have also seen no letter of support from EirGrid for this particular location.

The local road is poorly suited to heavy goods vehicles and abnormal loads, including delivery of two transformers of about 150 tonnes, and to emergency vehicles in wet conditions. I also note that drainage investigations should reflect winter conditions, as this land is wet.

5. Lack of Regulation

There is no clear guidance in relation to developments like this, and no specific national guidelines for large-scale energy infrastructure of this kind. I understand the Minister has acknowledged this. In that vacuum the Commission must not rely on applicant assertions or on climate policy alone. Section 15(1) of the Climate Action and Low Carbon Development Act 2015 imposes a duty only insofar as practicable. Landscape, ecology, agriculture, residential amenity and cumulative impact must all be weighed. The Commission, as competent authority under the EIA Directive, should satisfy itself independently on likely significant effects and on any scientific doubt, rather than relying on the applicant's documents alone.

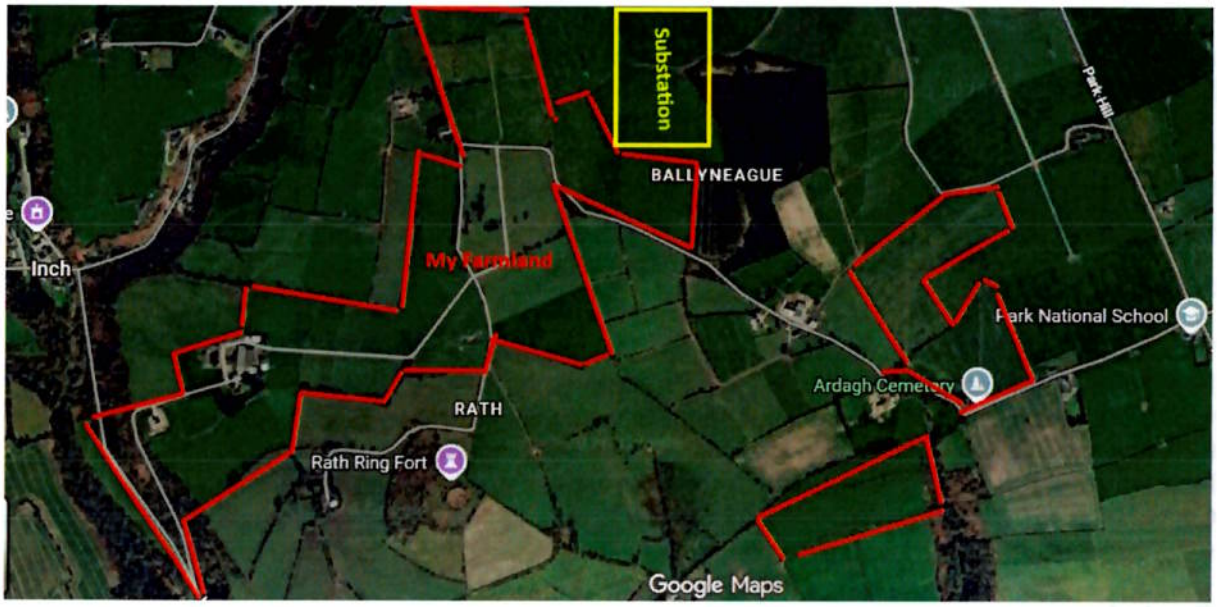
Conclusion

The application does not contain a noise and vibration assessment of this permanent station and its access. It does not assess fire, firefighting water or emergency access, and it does not consider alternatives or cumulative effects. This development, just outside the ditch of my home, puts my livestock and my livelihood at risk. I respectfully ask the Commission to refuse permission. At a minimum, I ask that it require further information on the matters raised, including a station-specific noise and vibration assessment with distances to houses, the oil volume and bund design, a fire and contaminated-water management plan, a fire appliance swept path, an alternatives comparison and a full cumulative assessment.

Please see below the marked out map showing the close proximity to my farmland and home.

Is mise,

Liam Fitzgerald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