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20th 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 resident living more than 5km from the proposed development, and I make this Observation on the application for the 220kV Air Insulated Substation and loop-in. It concerns only the substation, the loop-in and the access shown in red on drawing 300101185-DR-100B. The solar farm and battery storage are a separate application. However, the site notice seeks a permanent permission, with the station to be handed to EirGrid and to remain after any solar decommissioning. It must therefore be assessed as permanent infrastructure in its own right.

1. Emergency Risk and Fire

My priority concern is fire. The station will include up to two transformers, described in the site notice as oil-filled and bunded, and a diesel generator with fuel tank (Planning and Environmental Report, section 4.3). The local fire brigade has no experience of a fire at a substation of this kind, and the application does not show how such an event would be managed.

Section 3.7.8 of the EIA Screening Report and Table 4.1 rate the risk of major accidents and disasters as low. Neither assesses a fire at the transformers or the diesel tank, and Appendix H does not fill the gap. Schedule 7 of the Planning and Development Regulations 2001, as amended, requires consideration of the risk of major accidents and disasters relevant to the project.

The oil volume is not stated in the site notice, in section 4.3 or on drawing 300101185-DR-200. That drawing shows a full-retention separator and soakaways, and notes that bunds are to be fitted with "TBC at Detailed Design", the drawing being subject to change. It does not show that transformer oil and firefighting water would be retained in a bund rather than passing to a soakaway.

Emergency access is also not demonstrated. The red route runs north from the compound and then east to Site Access No. 1 on the R634. Section 4.3, Appendix H and drawing 300101185-DR-100B contain no fire appliance swept path, gate width or turning assessment. Appendix M is the Greenhills Energy Park traffic assessment and does not assess this route.

2. Noise and Vibration

The noise assessment on file is Appendix S, which is titled for the Greenhills Renewable Energy Park. Its scope covers the solar farm, the battery compound and the substation together. It is not an assessment of this application. Its closest distances, 5 m and 8 m in Table 1.1, are measured to the energy park boundary, not to the substation platform on drawing 300101185-DR-213. No distance from the compound or the access to any house is given.

The report's own test, from BS 5228 (section 1.2.5.1), is a level of 65 dB or more at a house for more than 10 days in any 15, or more than 40 days in six months. Section 5.5.6.1 of the Planning and Environmental Report puts these works at about 16 months, so the duration limb would be met if the level is. That level has not been calculated for this platform, this access or the haul route to Site Access No. 1. The 23 to 45 dB column in Table 1.28 is not that calculation.

The earthworks figures are also inconsistent. Drawing DR-213 gives a cut of 17,304 m3 and a fill of 34,649 m3, while its notes give 36,649 m3 plus 9,490 m3 of capping stone. Section 5.5.6.1 gives 25,013 m3 and says all excavated material will be reused. On either drawing figure, fill must be imported, which means sustained heavy traffic on the R634. Chapter 15 and section 3.7.6 of the Screening Report rely on Appendix S, so their conclusions inherit the same gap.

3. Hydrology and Flooding

Appendix N records a substation footprint of about 1.8 hectares, excavation of up to about 3.6 metres, and a permanent effect on the land described as "moderate, adverse and permanent". It also records about 9,320 m3 of imported stone for the platform. This differs from the 9,490 m3 on drawing DR-213, a further discrepancy.

Appendix N states that the site is outside the mapped flood zones. It acknowledges, however, that the adjacent Tourig_020 and Glendine_010 watercourses have mapped indicative flooding, and that local knowledge indicates flooding within the same sub-basin. The applicant's Flood Risk Assessment calculates an increase in runoff in a 1-in-100-year event of about 0.016 to 0.185 m3/s, up to 4.15 percent relative to the micro-catchment. Appendix N accepts that, without mitigation, flooding could occur on site or downstream. An absence of mapping beneath the platform is not an absence of risk.

Drawing DR-200 relies on a separator and soakaways. I ask that the Commission require site-specific evidence that these will function in the ground conditions, and that fire-water and oil contamination are addressed within the same system.

4. Lack of Regulation and Adequacy of Assessment

There is no EIAR. The application relies on a screening report and on documents prepared for the wider energy park. The Commission, as competent authority under the EIA Directive 2011/92/EU as amended by 2014/52/EU, must be satisfied that any screening conclusion rests on adequate information about this development, including its cumulative effects with the connected solar farm and battery. It should not rest on commercial assertions or on reasoning about a different project.

I understand the Minister has acknowledged that there are no specific national guidelines for utility-scale energy infrastructure. In that vacuum, the Commission should be cautious about accepting incomplete information. Section 15(1) of the Climate Action and Low Carbon Development Act 2015 requires regard to climate objectives only insofar as practicable. It does not displace the need for a proper assessment of fire, noise and flood risk. Matters left "to be confirmed" at detailed design should not be left for later.

5. Conclusion

I fully respect the need for renewable energy infrastructure. My concern is that a permanent 220kV station is proposed without a fire assessment, a project-specific noise assessment, consistent earthworks figures or a robust flood analysis. I respectfully ask the Commission to refuse permission. In the alternative, I ask it to seek further information on:
- oil volumes, bund capacity and firefighting water retention
- a fire appliance swept path and gate details for the full route from the R634
- evidence of consultation with the fire authority
- a noise and vibration assessment of the substation and access
- reconciled earthworks and traffic figures
- a site-specific drainage and flood assessment

Thank you for considering this Observation.

Is mise,

Liam Foley