Mag Long

Park

Youghal

Co. Cork

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 live between 200 and 500 metres from the proposed substation site, close to Park National School, and I use the L7829 daily to reach my home. We have lived here in Park all our lives and are 4th generation Longs living in our current home. I make this observation on the substation application only. The substation is permanent and will remain if the separate solar farm is decommissioned after 40 years, so it must be judged on its own merits.

Site Location and Alternatives

The EIAR must describe the reasonable alternatives studied and the main reasons for the option chosen, taking account of environmental effects (Directive 2014/52/EU and Schedule 6 of the Planning and Development Regulations 2001, as amended). I could not find in the application a comparison of other sites along the 220kV route. The only reason I can identify for this location is the availability of the landowner. Commercial convenience is not a reasoned comparison against clear criteria such as proximity to dwellings, noise, drainage and access. The applicant's own documents indicate a significant effect on more than 300 homes including my own, yet no alternative that might reduce that exposure is shown. I also have not found any letter of support

from EirGrid for this specific location. The test holes appears to have been carried out during dry summer conditions, although the site is known to be wet, so the least favourable conditions have not been tested.

Traffic and the School Route

The L7829 is my daily access route and is used by parents dropping and collecting children at Park NS. The application describes delivery of two transformers of about 150 tonnes each. Appendix M is the Greenhills Energy Park traffic assessment and is not an assessment of the route to this substation. Stop and go systems at the site entrances and at site entrance 8 and 9 would affect residents and school traffic every day during construction. Maintenance traffic would continue for as long as the substation exists. I ask that a route-specific traffic assessment be required, covering school drop-off and collection times and the permanent operational phase.

Visual Impact, Lighting and Noise

My family and I will see the substation and its associated infrastructure from the upstairs of our home. The LVIA, which uses GLVIA3 and 24 viewpoints, accepts that residents are highly sensitive receptors and notes that several dwellings surround the substation. However, it does not provide a dedicated assessment of the views from those houses including my own. The substation includes a compound of approximately 22,631.71 square metres, a 438 square metre control building, a 590 square metre IPP building, two transformers, a 2.6 metre perimeter fence, lighting masts and lightning protection masts of approximately 18 metres. Viewpoints VP4 and VP5 refer to nearby dwellings, but the discussion concerns solar panels, hedgerows and screening. The reasoning that panels no higher than 3.4 metres will be screened cannot be applied to 18 metre masts and 37.5m masts, which may rise above hedgerows. No ZTV analysis or photomontage from the nearest homes demonstrates otherwise including our own.

The LVIA relies on new planting (hedges and trees) that will take years to establish, and does not show views immediately after construction, in winter, or in intervening years. Night-time lighting and the noise from transformers may carry during the day and at night have not been assessed from the nearest homes including our own house. This will permanently change the landscape we enjoy.

Water Pollution

The Tourig is the drinking water source for Inch village and Youghal town and flows to the River Blackwater, a European designated site. The CEMP itself acknowledges the construction pollution risk. The substation requires cut and fill of approximately 13,600 cubic metres of topsoil and 39,690 cubic metres of subsoil across 4.71 hectares (CEMP Appendix B, Spoil Management Plan, pages 3 and 4). The CEMP describes an extensive network of historic and unmapped drains discharging towards the Tourig (Appendix F, Section 3.2), and identifies EPA drinking water rivers as sensitive receptors.

Two oil-filled transformers will be present. The applicant's own Schedule of Mitigation (Appendix C, Section 11.5.4.4) accepts that a risk of accidental spillage and leaks remains in operation. The

extensive silt, fuel and monitoring controls proposed show that the risk is substantial. I ask the Commission to consider whether Appropriate Assessment under Article 6(3) of the Habitats Directive can be completed on this evidence, and to require a clear explanation of what water will reach the soakaway and how it will be treated.

Emergency Risk and Fire

The substation is close to homes, including those of my children and grandchildren. The Planning and Environmental Report (Section 4.3) lists two transformers, a diesel generator and a fuel tank. The EIA Screening Report (Section 3.7.8 and Table 4.1) rates the risk of major accidents as low, but does not assess a fire at the oil- filled transformers or the diesel tank, as Schedule 7 of the Regulations requires consideration of major accident risk.

Drawing 300101185-DR-200 states that bunds are "TBC at Detailed Design", gives no oil volume, and does not show that firefighting water would be retained rather than passed to the surface-water system and soakaway. Access is equally unresolved. Because the substation will remain after the solar farm, the new entrance from the R634 (Site Access No. 1, drawing 300101185-DR-100B) is the route a fire services must use. I understand emergency services would have to travel approximately one mile of gated private land. There is no swept path, stated gate width or turning assessment, and drawing 300101185-DR-210 does not demonstrate that a emergency services can pass the gate. The road is also heavily affected by wet conditions. This could delay both response and the evacuation of nearby homes. The application does not show whether the local fire service is equipped to deal with a fire at this plant, particularly with a battery storage facility and forestry nearby.

Request

For these reasons, I respectfully ask the Commission to refuse permission. At a minimum, I ask it to request further information on alternative sites, route-specific traffic impacts, a residential visual assessment including lighting and noise, a full hydrological and fire-water assessment, and a fire safety and emergency access plan agreed with the fire authority.

Thank you for considering this observation.

Is mise,

Mag Long