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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

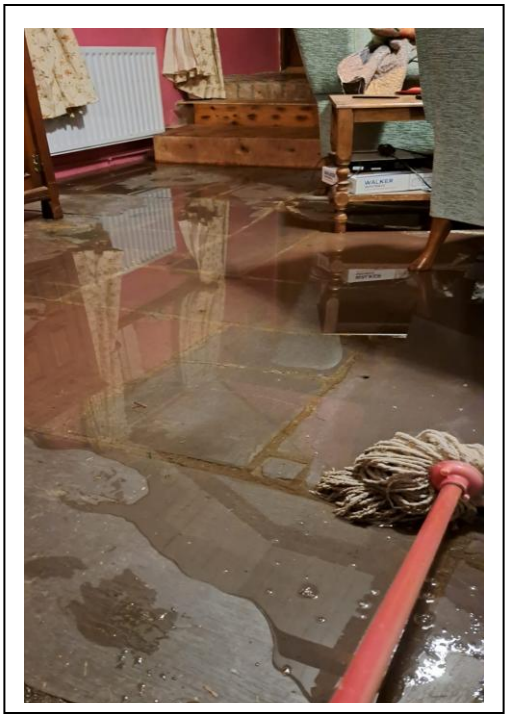
Dear Sir/Madam,

I am a retired resident living close to the proposed development, and I make this observation as a member of the local community. I do not object to renewable energy in principle. My concern is whether this infrastructure is appropriate at this location, and whether the application is complete enough for the Commission to be satisfied on the matters below. This observation relates only to the substation application.

FLOOD RISK

Land in this area, including my own property, is prone to flooding in periods of heavy weather. The applicant's Appendix N states that the site is not within a mapped flood zone. It also accepts that the adjacent Tourig_020 and Glendine_010 watercourses have mapped indicative flooding in low and medium probability zones. It records that "local knowledge has also indicated that local flooding is occurring within the same river sub-basin" (Section 1.8.3, pp.49-51). The absence of a mapped flood zone beneath the substation is therefore not the absence of risk.

The works are substantial. Appendix N gives the substation footprint as approximately 1.8 hectares, with an effect on land described as "moderate, adverse and permanent". It records excavation of up 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 (Sections 1.4.1.2 and 1.4.1.3, pp.28-29). The Flood Risk Assessment calculates that a 1-in-100-year storm would produce a net runoff increase of approximately 0.016 to 0.185 cubic metres per second, up to about 4.15 percent relative to the micro-catchment. It acknowledges that without mitigation, construction could cause flooding on site or downstream (Section 1.9.1.1, pp.60-61). For neighbours who already experience flooding, any such increase matters. I ask the Commission to require robust site-specific evidence that flow paths, infiltration and downstream flows will not be made worse.



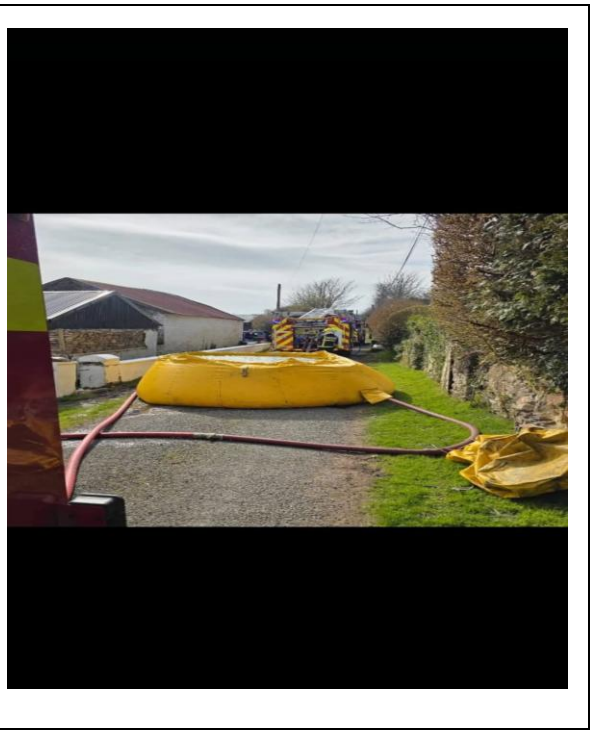
FIRE RISK

My thatch cottage recently caught fire. Fire engines had to come from Tallow in County Waterford and from Youghal, because there is no local rural fire service. I live on a narrow boreen, one car wide, and the appliances were in single file, blocking all access. They had to reverse blind onto the main road to reach the river to refill, because this area has only wells and no hydrants. The fire took 24 hours to extinguish and weeks to stop smouldering. If that was the response needed for one small cottage, I question how a fire at an industrial installation could be handled.

The application does not address this. Section 4.3 of the Planning and Environmental Report lists up to two 220kV transformers, switchgear, and a diesel generator and fuel 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 relevant to the project. The EIA Screening Report deals with this at section 3.7.8, but only in terms of concrete, hydrocarbon spills from construction plant and construction-site accidents. Table 4.1 rates the risk as "Low". Neither section assesses a fire at the transformers or the diesel tank.

Drawing 300101185-DR-200 shows a full-retention separator and soakaways on the surface-water system, and notes that bunds are "TBC at Detailed Design". The oil volume is not stated, and the drawing does not show that firefighting water would be retained rather than passed towards a soakaway. No firefighting water supply is described.

On access, the route from Site Access No. 1 on the R634 is shown on drawing 300101185-DR-100B. I could find no fire appliance swept path, gate width or turning assessment for it. Appendix M is the traffic assessment for the Greenhills Energy Park and is not an assessment of this route. These matters should be demonstrated now, not deferred.





INCREASED TRAFFIC CONGESTION AND SAFETY

As an elderly resident, I am concerned that increased traffic and congestion will make it difficult and unsafe for me to leave my home. The rural road network is not capable of handling the increased traffic congestion that will be created by the construction works. All of these new industrial projects in our local area will have a cumulative effect on the traffic concentrated around this local area.
A 110kV substation has already been permitted under PA04.309121, roughly 4 kilometres from the proposed 220kV substation. Construction traffic for both is proposed to use the R634. That raises the prospect of overlapping heavy goods vehicle and abnormal load movements, including transformers of around 150 tonnes, on a rural road network with no pavements.

IN CONCLUSION
In summary, the application does not demonstrate that this permanent high-voltage substation can be located safely on this wet, flood-sensitive land, or that emergency services could respond to a fire there. Nor does it assess the cumulative traffic and other effects with neighbouring energy developments. I respectfully ask the Commission to refuse permission. At a minimum, I ask it to request further information on:
- site-specific flood and drainage evidence
- transformer oil volumes, bund capacity and firefighting water retention
- a fire appliance access and swept path assessment for Site Access No. 1
- a cumulative assessment including the permitted 110kV substation and shared use of the R634

Thank you for considering my observation.

Is mise,

Margaret Adams