Margaret Walshe
Inch
Killeagh Cork

2nd November 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 500 metres and 1 kilometre from the proposed site and make this Observation on the substation application only. The solar farm and battery storage are a separate application. However, the substation is to be permanent and would remain if the solar farm were decommissioned after 40 years, so it must be assessed as permanent infrastructure in its own right.

Hydrology and Flooding

My home was flooded during Storm Babet and suffered a great deal of damage. I therefore speak from direct experience. In my respectful submission, this is not a suitable location for permanent high voltage infrastructure, being a flood prone and flood risk area. I do not object to renewable energy in principle.

Appendix N states that the substation footprint is approximately 1.8 hectares and that the effect on land occupied by the substation and new and upgraded access tracks will be moderate, adverse and permanent. It records excavation of up to about 3.6 metres, combined cut and fill of approximately 25,013 cubic metres for the substation and battery storage, and about 9,320 cubic metres of imported stone to cap the platform to a depth of 400 mm. Drawing 300101185-DR-213 shows a cut of 17,304 cubic metres and a fill of more than 34,000 cubic metres. The volumes are not consistent across the documents, which makes it difficult to judge the true scale of the works.

Appendix N says the site is not within a mapped flood zone. It also acknowledges that the Tourig_020 and Glendine_010 watercourses adjacent to the site have mapped indicative flooding in low and medium probability zones, and that local knowledge indicates flooding within the same sub-basin (Section 1.8.3). The absence of a mapped zone beneath the compound is not the absence of risk, as my own experience shows.

The applicant's Flood Risk Assessment calculates that a 1-in-100-year storm would produce a net increase in runoff of approximately 0.016 to 0.185 cubic metres per second, up to about 4.15 percent relative to the micro-catchment (Section 1.9.1.1). Appendix N accepts that, without mitigation, construction could lead to flooding on site or downstream, and that poorly designed drainage could create new preferential pathways and erosion. An increase of that order, in a sub-basin where flooding already occurs, is

significant for downstream households such as mine.

I also understand that the drainage investigations were carried out in dry summer conditions, whereas local experience is that the ground is frequently wet and waterlogged. I ask the Commission to require evidence of winter and wet-weather conditions, and a demonstration, consistent with the Planning System and Flood Risk Management Guidelines, that flood risk elsewhere will not be increased.

Archaeology

Appendix R is an assessment of the wider energy park. Its avoidance measures, namely non-intrusive gabion or ballasted foundations and stand-off buffers around anomalies M1 to M4, are solar measures. Drawing 300101185-DR-213 shows the compound formed by cut and fill to 109.05 metres, which cannot sit on gabion baskets. The geophysical survey (licence 26R0042) covered only a significant portion of the site, and the applicant does not confirm that the compound, tower bases or widened access were surveyed. Paragraphs 6.34 and 6.35 rely on monitoring during construction, with preservation in situ only "where feasible". On a platform that must be cut, that is too late. The hillfort CO067-001001, 490 metres west of the boundary, is described but its setting is not assessed against a permanent compound and new towers.

Visual Impact

The LVIA acknowledges that residents are highly sensitive and that several dwellings surround the substation, but it provides no dedicated residential assessment of the substation. Viewpoints such as VP4 and VP5 discuss solar panels, which rise no more than 3.4 metres. The substation includes a compound of about 22,632 square metres, a 2.6 metre fence, transformers, lighting and lightning masts of approximately 18 metres, with lattice structures of 37.5 metres. These will rise above hedgerows that screen panels. The LVIA relies on planting with a three year establishment period, without showing views from houses at construction, year three, year ten or in winter.

Site Location

The documents show no comparison of reasonable alternative sites along the 220kV route, as the EIA Directive and the EPA guidance on environmental impact assessment reports expect. Site selection appears to rest on landowner agreement. The applicant's own material indicates an impact on over 300 homes, and I note that no supporting letter from EirGrid appears on the file. The access from the R634 is also poorly suited to heavy goods vehicles and to emergency vehicles in wet conditions.

Noise and Vibration

Appendix S covers the whole energy park. Its distances of 5 metres and 8 metres are to the energy park boundary, not to this compound or access, and no distance to any house is given. Under the BS 5228 test cited in section 1.2.5.1, 65 dB at a house for more than 40 days in six months is significant, and the works are programmed for about 16 months (section 5.5.6.1). That level has not been calculated for this platform, the imported fill, the capping stone, the transformer deliveries or the access to Site Access No. 1. Compliance has not been shown, and there is no EIAR.

Conclusion

The application relies on documents prepared for a different project, leaves key flood, archaeological, visual and noise effects unassessed, and puts permanent infrastructure in a location already prone to flooding. I respectfully ask the Commission to refuse permission. At a minimum, I ask it to request further information on the matters raised, particularly a substation-specific flood risk and drainage

assessment, before any decision is made.

Is mise,

Margaret Walshe