Michael & Noreen Holland
Mount Uniacke
Killeagh 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,

We, Michael and Noreen Holland, are retired farmers living between 1 and 5 kilometres from the proposed development. We make this Observation on the application for a 220kV Air Insulated Substation and related works. We do not oppose renewable energy in principle. This Observation concerns the substation only. It is permanent infrastructure and would remain in place even if the separate solar farm were decommissioned after 40 years.

(a) Water Pollution and Water Supply
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The site is crossed by the Carignass, Knocknappagh, Ballyleague, Ballygarvin and Youghal Park streams. These drain to the Tourig and Glendine rivers and on to the River Blackwater, a European designated site, and the Celtic Sea. The applicant's own CEMP acknowledges a construction pollution risk (Section 2.4, page 9). The Spoil Management Plan (CEMP Appendix B, pages 3 and 4) describes recontouring of 4.71 hectares, with about 13,600 cubic metres of topsoil and 39,690 cubic metres of subsoil, leaving exposed ground open to silt-laden runoff. The CEMP records historic and unmapped drains (Appendix F, Section 3.2) and EPA designated drinking water rivers as sensitive receptors (Sections 3.1 and 3.5).

The site largely overlies the Glenville Groundwater Body, a locally very important aquifer. Most of the site is classed as High groundwater vulnerability, and Extreme to the south. Even so, drainage relies on infiltration, including a 5m x 5m x 1.8m soakaway within the compound (CEMP Sections 3.2.2, 3.3 and 3.4). Two 33/220kV transformers will contain oil. The Water Quality Monitoring Plan accepts a residual risk of accidental spillage, leaks and overloading of surface water infrastructure (CEMP Appendix C, Section 11.5.4.4). The extensive controls proposed, such as settlement tanks, daily pH testing and 110 percent bunding, show the risk is substantial. As residents who depend on local groundwater and watercourses, we are concerned for private wells and drinking water. We ask the Commission to require clarity on what water will reach the soakaway, how it will be treated, and what happens if a transformer or bund fails. We also ask that Appropriate Assessment be carried out under Article 6(3) of the Habitats Directive.

(b) Hydrology and Flooding
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Inch and the surrounding areas are very prone to flooding, and this development will intensify the problem. Appendix N states that the substation footprint is about 1.8 hectares, with excavation to about 3.6 metres. It records combined substation and BESS cut and fill of about 25,013 cubic metres and about 9,320 cubic metres of imported stone. It describes the effect on land as moderate, adverse and permanent (Sections 1.4.1.2 and 1.4.1.3, pages 28 and 29).

Appendix N also accepts that the adjacent Tourig_020 and Glendine_010 watercourses have mapped flood zones, and that local knowledge indicates flooding within the same sub-basin (Section 1.8.3, pages 49 to 51). The Flood Risk Assessment calculates a 1 in 100 year runoff increase of 0.016 to 0.185 cubic metres per second, up to 4.15 percent of the micro-catchment. It accepts that without mitigation flooding could occur downstream (Section 1.9.1.1, pages 60 and 61). A site outside a mapped flood zone can still worsen flooding elsewhere. We are also concerned that drainage investigations appear to have been carried out in dry summer conditions. We ask for evidence based on winter conditions showing that downstream flooding will not worsen.

(c) Visual Impact
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The LVIA uses a 5km study area and 24 viewpoints. It accepts that residents are highly sensitive receptors and that several dwellings lie around the substation (page 28). The substation includes a compound of about 22,631.71 square metres, a 438 square metre control building, a 590 square metre IPP building, two transformers, a 2.6 metre fence, lighting and lightning protection masts of about 18 metres. We note this compound area differs from the 1.8 hectare footprint in Appendix N and ask for clarification.

The LVIA is largely structured around the solar panels, which will not exceed 3.4 metres. Viewpoints VP4 and VP5 concern dwellings but discuss panels and hedgerows, not the substation. No dedicated residential assessment shows what nearby homes will see. Screening that conceals 3.4 metre panels cannot be assumed to conceal 18 metre masts. The LVIA also relies on planting that needs a three year establishment period. We ask for ZTV analysis and photomontages from the nearest dwellings, showing views at completion, after 10 years and in winter.

(d) Cumulative Effect
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Cork County Council, in its assessment of Ref. 25/6876, asked for a cumulative assessment of the solar farm and the permitted Lyrenacarriga Wind Farm. The later submission under Ref. 26/2133 did not adequately provide it. A 110kV substation (PA04.309121) is already permitted approximately 4 km from this site. Construction traffic for both substations is proposed to use the R634. This raises the prospect of overlapping heavy goods vehicle and abnormal load movements, noise, dust and road safety impacts on local and major roads. Those impacts could affect livelihoods and children's safety. Separate applications should not prevent a proper cumulative assessment, both spatially and over time, of the solar farm, the wind farm and both substations.

(e) Lack of Regulation
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The Commission is the competent authority under the EIA Directive 2011/92/EU as amended by

2014/52/EU. It must ensure a complete and independent assessment, including cumulative effects, and not rely solely on the applicant's documentation. We note that Section 15(1) of the Climate Action and Low Carbon Development Act 2015 imposes only a qualified duty to act insofar as practicable. Climate benefit alone cannot outweigh landscape, ecological, amenity and infrastructure considerations. We understand national guidelines for utility scale energy infrastructure are lacking, and that two related applications were found invalid by Cork County Council. In that context, local planning knowledge should carry real weight.

(f) Site Location and Entrance
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The new entrance is proposed on the R634 (Youghal-Tallow Road), a major thoroughfare. Heavy goods vehicles and abnormal loads entering there raise serious concerns about road safety, congestion and emergency access, and the road in our view is unsuited to such traffic. Schedule 6 of the Planning and Development Regulations 2001 requires the EIAR to describe reasonable alternatives. We have not found a comparison of alternative sites along the 220kV route. Site selection appears to rest largely on landowner willingness. The applicant's own documents indicate impact on over 300 homes, and we have seen no letter of support from EirGrid or ESB Networks for this location.

Conclusion
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For these reasons, we respectfully ask An Coimisiun Pleanala to refuse permission. At a minimum, we ask the Commission to seek further information on the matters raised above before any decision is made.

**Is mise,**

Michael and Noreen Holland