Ballydaniel
Lackaroe
Youghal
Co Cork

30th 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 less than 50 metres from the proposed substation, and my lands bound the proposed entrance and driveway. I am 82 and have lived here all my life. My wife and I are both in our 80s. This observation concerns the substation application only. The application seeks a permanent station, to be handed to EirGrid and to remain even if any solar farm is decommissioned, and it must be judged on that basis.

1. Water Pollution and Our Well

We depend on well water. The site is largely underlain by the Glenville Groundwater Body, a locally important aquifer. The CEMP classes most of the site as high groundwater vulnerability, and extreme in places to the south. Several streams cross the site and drain through the Tourig and Glendine rivers to the River Blackwater, a European designated site. The CEMP (Sections 3.1 and 3.5) also accepts that EPA designated drinking water rivers are sensitive receptors. It describes an extensive network of historic and unmapped drains (Appendix F, Section 3.2). Forming the platform requires major cut and fill, which exposes bare ground to rainfall and silt runoff. In operation, the compound will hold two 33/220kV transformers, with surface water directed through an interceptor to a soakaway of 5m x 5m x 1.8m (CEMP Section 3.2.2). The applicant's own Water Quality Monitoring Plan accepts a residual risk of accidental spillages and leaks (CEMP Appendix C, Section 11.5.4.4). Infiltration to highly vulnerable groundwater needs far more than this. I ask that the applicant identify private wells near the site, provide baseline well testing, and show what water can reach the soakaway and how it is treated first.

2. Site Selection and Alternatives

The site is known locally as Cronins bogs, and in my lifetime it has always been wetland. That makes it wholly unsuitable for a permanent high voltage station. The drainage reports appear to

rely on work done in dry summer conditions, which does not reflect the site as I know it. I can find no comparison of reasonable alternative sites along the 220kV route. The EIA Directive 2014/52/EU, as transposed through Schedule 6 of the Planning and Development Regulations 2001, as amended, requires a description of reasonable alternatives and the reasons for the choice made. Landowner agreement appears to be the only stated basis for the choice. The applicant's own documents show significant effects on over 300 homes, yet no less populated option is presented. I also find no letter of support from EirGrid on file. Given the wetland setting and the Blackwater connection, I ask the Commission to consider whether an EIAR and appropriate assessment under Article 6(3) of the Habitats Directive are required. The file relies instead on a screening report.

3. Noise and Vibration

My wife wears hearing aids, and we will be closest to the works. The noise assessment at Appendix S is titled for the Greenhills Renewable Energy Park and covers the solar farm, trenching, battery compound and substation together. It is not an assessment of this substation and its access. Table 1.1 gives distances of 5 m and 8 m to the energy park red line, not to the platform on drawing 300101185-DR-213. It gives no distance from the compound or the access to any house. The report's own BS 5228 test is 65 dB 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 part of the test would be met. Yet no level has been calculated for this platform or for the haul route to Site Access No. 1. The fill volumes also conflict. Drawing DR-213 shows a cut of 17,304 m3 against a larger fill, its notes give 36,649 m3, and section 5.5.6.1 gives 25,013 m3 while saying all material will be reused. Imported fill, capping stone and 150 tonne transformer deliveries must pass our door. Vibration has not been assessed for our home.

4. Archaeology and Rath Fort

The Rath hillfort (CO067-001001) lies 490 m west of the site boundary and is a treasured local monument. Appendix R describes it as occupying a commanding position, but I can find no specific assessment of the effect of a permanent compound, lightning masts and new towers on its setting. The avoidance measures in Appendix R are solar measures, such as gabion or ballasted foundations. They cannot apply to a platform formed by cut and fill. The geophysical survey (licence 26R0042) covered only a significant portion of the site, and the applicant does not state that the compound, tower bases or widened access were inside it. Paragraphs 6.34 and 6.35 rely on monitoring during construction and preservation in situ only where feasible. On an approved platform that is already cut to level, that is a recording exercise rather than protection. Cork County Council has already said that sub-surface assessment was required before a decision on the related solar application, and the same standard should apply here.

5. Visual Impact

Rath fort is the focal point of the view from our home and lands, and the proposed substation would sit in front of it. The LVIA accepts that residents are highly sensitive receptors and notes dwellings around the substation (page 28). However, I can find no dedicated assessment of the substation from the nearest houses. Viewpoints such as VP4 and VP5 discuss solar panels and hedgerows, not the substation. The substation includes a 22,631 m2 compound, a 438 m2 control building, a 590 m2 IPP building, transformers, lighting, 2.6 m fencing and lightning

masts of about 18 m, with lattice structures of 37.5 m. These will rise above hedgerows that might hide a 3.4 m panel. The LVIA relies on planting that takes at least three years to establish. I ask for residential visualisations and ZTV analysis showing winter views and views at construction, year 3 and year 10.

6. Emergency Risk and Fire

We are in our 80s and keep livestock. The station will contain oil-filled transformers and a diesel generator with fuel tank. Section 3.7.8 and Table 4.1 of the screening report rate major accident risk as low, but neither assesses a transformer or diesel tank fire. Drawing DR-200 states that bunds are "TBC at Detailed Design", and the oil volume is not stated. It does not show that firefighting water would be retained rather than passed to the soakaway. I can find no fire appliance swept path, gate width or turning assessment on the red route from Site Access No. 1 to the transformer bays, and Appendix M does not assess this route. There is no information on how neighbours and their animals would be warned or evacuated. As the station is permanent, these matters should be resolved now and not left to detailed design.

7. Conclusion

For these reasons, I respectfully ask the Commission to refuse permission. At a minimum, I ask that further information be requested on the matters above, including an EIAR, an alternatives assessment, an assessment of noise, vibration, visual and fire risk specific to this substation, and protection of local wells. My wife and I only wish to spend our remaining years in peace in the home we have always known.

Is mise,

Michael Carey



View from my home – arrow indicates where the substation is proposed to be.