Michael Holland
Ballygrunna
Inch
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,

I live at Ballygrunna, between 500 metres and 1 kilometre from the proposed site and directly across the valley from it. I am a tillage farmer and operate Foxglove Lodge, an agri-tourism enterprise of three holiday properties established in 2021. This Observation concerns the substation application only. This substation is sought permanently and would remain if the solar farm were decommissioned after 40 years. It must be judged on that basis.

Site Selection and Alternatives
Schedule 6 of the Planning and Development Regulations 2001, as amended, which transposes Directive 2014/52/EU, requires an EIAR to describe the reasonable alternatives studied and to give the main reasons for the option chosen, including a comparison of environmental effects. I submit that the application does not do this. I can find no structured comparison of other locations along the 220kV route and no clear criteria against which this site was tested. The evident driver is landowner agreement, which is a commercial convenience and not a planning rationale. The applicant's own material indicates significant impact on over 300 homes, yet no alternative that might reduce that exposure is shown. No letter of support from EirGrid or ESB Networks for this specific location appears to have been provided.

The drainage work at Appendix B appears to have been carried out in dry summer conditions, while the site is known locally to suffer wetland conditions. This matters because the River Tourig adjoins and crosses these lands, supplies mains water to Inch and Youghal, and supports protected lamprey within a Special Area of Conservation. Ground disturbance across more than 10 acres over a multi-year build creates a clear pathway for sediment and pollutants. I ask the Commission to be satisfied that the Natura Impact Statement excludes any reasonable scientific doubt as to adverse effects on site integrity, as Article 6(3) of the Habitats Directive requires, and that the Water Framework Directive and the 2009 Surface Waters Regulations are met. A qualified wildlife ranger has recorded an abundance of red squirrels, protected under the Wildlife Acts, in the valley between my lands and the site. The ecological assessment relies heavily on desktop study and gives them no meaningful consideration. Security fencing across multiple acres would also fragment movement corridors for deer and other wildlife.
The River Tourig, which flows through the development site, is designated as a Special Area of

Conservation protecting lamprey species. The construction and operational impacts on this protected watercourse and its associated species have not been adequately characterised, particularly regarding sedimentation, pollution, and hydrological changes

Landscape and Rural Tourism

In my view the topography makes screening impossible. No hedgerow or trees can screen masts of over 37.5 metres from elevated viewpoints across the valley.

In 2021, we established Foxglove Lodge, an agri-tourism enterprise comprising three holiday properties. Our business model centres on providing visitors with an immersive countryside experience. Guests consistently comment on the beauty of the surrounding green landscape, views toward Youghal, and the presence of historical features including Rath Fort. We actively encourage visitors to walk local trails, visit the Church in Inch, observe tillage operations, and support local businesses including Joe's Farm Shop

A typical two-day stay generates roughly 600 euro of spending in the local economy. My agri-tourism business actively encourages guests to walk our lands and visit the River Tourig corridor to experience the natural environment. Water pollution from this development would directly undermine both the ecological integrity of the area and the experiential value that forms the foundation of our tourism offering.

The visual impact of multiple acres of industrial installations will fundamentally alter what guests experience from our business. Visitors travel from urban areas throughout Ireland and internationally specifically to experience unspoiled rural landscape in Inch. The industrialisation of this landscape directly threatens the viability of our business. We face potential negative reviews and loss of bookings if the primary amenity we offer (rural landscape beauty) is destroyed.

A permanent industrial station in that view puts this at risk and runs counter to the support for rural tourism in the National Planning Framework and the Regional Spatial and Economic Strategy.

Emergency Risk and Fire

Section 4.3 of the Planning and Environmental Report lists up to two 220kV transformers, switchgear, and a diesel generator with fuel tank. The site notice describes the transformers as oil-filled and bunded. Schedule 7 of the 2001 Regulations requires consideration of the risk of major accidents and disasters. The EIA Screening Report at section 3.7.8 addresses concrete, hydrocarbon spills from plant and construction accidents, and Table 4.1 rates the risk as low. Neither that section, section 4.3 nor Appendix H assesses a fire at the transformers or the diesel tank. Drawing 300101185-DR-200 states that bunds are "TBC at Detailed Design". No oil volume is given, and the drawing does not show firefighting water being retained in a bund rather than passing through the separator to a soakaway. With a drinking water source nearby, this is a serious gap.

Access is equally unresolved. The route is the new access road from Site Access No. 1 on the R634, shown on drawing 300101185-DR-100B. The application gives no fire appliance swept path, no gate width and no turning assessment. Drawing 300101185-DR-210 is not used to show an appliance can pass, and Appendix M concerns the Greenhills Energy Park, not this route. As I understand it, responders would face approximately one mile of gated farm road. Any delay endangers neighbouring homes, schools and livestock. These matters should be demonstrated now and not deferred to detailed design.

Cumulative Effect

A 110kV substation permitted under PA04.309121 lies approximately 4 km from this site. Cork County Council asked, under Planning Ref. 25/6876, for a cumulative assessment of the solar farm and the permitted Lyrenacarriga Wind Farm. I understand that the later application, Ref. 26/2133, did not adequately provide it and did not properly take this 220kV substation into account. Construction traffic for both substations is proposed on the R634, including abnormal loads such as the two transformers of

about 150 tonnes described at section 1.3.3, potentially over overlapping periods. Separate applications do not remove cumulative landscape, traffic, noise and road-safety effects. I also ask the Commission to require the applicant to state whether land is being left for future EirGrid expansion, and to assess any such extension now. Our community has seen at Knockraha how later expansion can proceed without meaningful local input.

Archaeology and Heritage Setting

The avoidance measures in Appendix R are solar measures: gabion or ballasted foundations and buffers around anomalies M1 to M4. Drawing 300101185-DR-213 shows the compound formed by cut and fill, with 17,304 cubic metres of cut, 34,669 cubic metres of fill and a finished level of 109.05 m. A platform of that kind cannot sit on gabions. The geophysical survey 26/2133 CCC covered a significant portion of the site and not all of it, and the applicant does not state that the compound, tower bases or widened access were inside the surveyed area. Monitoring during construction, with preservation in situ only "where feasible" (paragraphs 6.34 and 6.35), comes too late for a platform already approved and cut to level. The Council told the same developer, on 10 February 2026, that sub-surface assessment was required before a decision on the solar application. This compound should not be held to a lower standard.

Appendix R also records a hillfort, CO067-001001, in Rath townland, 490 m south east of the site boundary, in a commanding position, but contains no specific assessment of the effect of a permanent compound, lightning masts and new towers on its setting. Rath Fort could become a tourism asset for this locality, including my business.

Conclusion

For these reasons I respectfully ask the Commission to refuse permission. At a minimum, I ask that further information be requested on reasonable alternatives, seasonal hydrology, fire and emergency access, cumulative effects and sub-surface archaeology. Please see pictures of the views of our agri tourism business of the 800 acre solar farm and 220kv substation and associated works.

Is mise,

Michael Holland









