Michael Murphy
Coolbeggan
Tallow
Co. Waterford

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 within 2 miles from the proposed development and wish to make this observation. It concerns the substation application only. Section 6.3 of the application states that the substation and loop-in will be handed to the network operator and will not be decommissioned. They must therefore be assessed as permanent plant, remaining long after any related solar development ends.

1. Emergency Risk and Fire

Section 4.3 of the Planning and Environmental Report (printed page 57) lists up to two 220 kV transformers, switchgear, and a diesel generator and fuel tank. The site notice describes the transformers as oil-filled and bunded, but section 4.3 uses neither term. Schedule 7 of the Planning and Development Regulations 2001, as amended in 2018, requires consideration of the risk of major accidents and disasters relevant to the project. The EIA Screening Report addresses this at section 3.7.8, but only in terms of concrete, hydrocarbon spills from construction plant and construction accidents. Table 4.1 rates the risk as "Low - Construction and operation - design to mitigate". Neither section 3.7.8 nor section 4.3 assesses a fire at the oil-filled transformers or the diesel tank, and Appendix H does not do so either.

Drawing 300101185-DR-200 shows a full-retention separator and soakaways on the surface water system, and states "Bunds to be fitted with TBC at Detailed Design". The oil volume is not given on the site notice, in section 4.3 or on that drawing. Nothing shows that a bund would retain transformer oil together with firefighting water, rather than pass contaminated water towards a soakaway. A permanent 220 kV facility should not rely on matters left to be confirmed later.

Emergency access is also unaddressed. The access route is shown in red on drawing 300101185-DR-100B, running to Site Access No. 1 on the R634. I could find no fire appliance swept path from that entrance to the transformer bays, no stated gate width and no turning assessment in section 4.3, Appendix H or on that drawing. Drawings DR-200 and DR-210 do not fill this gap. Appendix M is the traffic assessment for Greenhills Energy Park and does not assess this route.

2. Water Pollution

The site drains through the Carignass, Knocknagappagh, Ballyneague, Ballygarvin and Youghal Park streams and the Tourig and Glendine rivers, towards the River Blackwater, a designated European site, and the Celtic Sea. The applicant's own CEMP acknowledges the construction pollution risk (section 2.4, page 9). The Spoil Management Plan (CEMP Appendix B) describes approximately 13,600 cubic metres of topsoil and 39,690 cubic metres of subsoil being recontoured over 4.71 hectares. That exposes a large area to rainfall and creates a clear risk of silt and sediment run-off. CEMP Appendix F, section 3.2, describes an extensive network of historic and unmapped drains leading through the River Tourig to the Blackwater. CEMP sections 3.1 and 3.5 identify EPA designated drinking water rivers as sensitive receptors.

The site is largely underlain by the Glenville Groundwater Body. The CEMP classifies most of the site as high groundwater vulnerability, and extreme in places to the south (sections 3.3 and 3.4). Despite this, the drainage relies on infiltration, including a 5m x 5m x 1.8m infiltration area within the compound (CEMP section 3.2.2). The CEMP describes oil and fuel being managed through a SuDS train with an interceptor and soakaway. That leaves a pathway to groundwater and watercourses if a transformer or bund fails. The Schedule of Mitigation (CEMP Appendix C, section 11.5.4.4) accepts that a risk of accidental spillage and leakage remains in the operational phase. The extensive controls listed in Appendices C and E also point to a substantial risk. These include silt fences, settlement tanks, turbidity monitoring, bunded fuel storage and daily pH testing.

The application should state precisely what water will be allowed to reach the soakaway and how it will be treated before infiltration. Given the hydrological connection to the Blackwater, I respectfully ask the Commission to be satisfied, under Article 6(3) of the Habitats Directive, that no reasonable scientific doubt remains as to the absence of adverse effects.

3. Site Location and Consideration of Alternatives

I could not find in the application documents a comparison of reasonable alternative locations for the substation along the 220 kV route. The EIA Directive 2014/52/EU, transposed through the Planning and Development Act 2000 and the 2001 Regulations, together with the EPA Guidelines on the information to be contained in Environmental Impact Assessment Reports (2022), expect reasonable alternatives to be described and compared in environmental terms. The documents do not set out selection criteria or a side-by-side comparison. The only apparent basis for this location is the availability of

the landowner. That is a commercial convenience and not a planning rationale for permanent infrastructure.

The site's physical constraints reinforce this concern. The water and groundwater sensitivities described above are exactly the kind of environmental criteria against which alternatives should have been tested. I am also concerned that site conditions, particularly drainage, should be assessed under wet winter conditions and not only in drier periods.

Access is a further locational weakness. Section 1.3.3 describes the delivery of two transformers of about 150 tonnes. The application does not demonstrate that the route from the R634 is suitable for abnormal loads, or for the fire appliances and other emergency vehicles that would need to reach the site in poor weather. I have also not been able to identify any letter or statement from EirGrid supporting this specific site and connection arrangement.

4. Conclusion

The application leaves key safety and environmental matters unresolved: fire management at oil-filled plant, emergency access, groundwater and surface water protection, and the justification of the site against alternatives. For the reasons set out above, I respectfully ask the Commission to refuse permission. At a minimum, I ask the Commission to request further information on the following:
- the transformer oil volume, bund capacity and firefighting water retention
- a fire appliance swept path, gate width and turning assessment from Site Access No. 1 to the transformer bays
- a full assessment of fire as a major accident risk under Schedule 7
- a detailed drainage and groundwater assessment of the soakaway arrangements
- a documented comparison of reasonable alternative sites

Thank you for considering this observation.

Is mise,

Michael Murphy