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21st 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. INTRODUCTION AND SCOPE

I am a resident of the wider area, living more than 5km from the proposed development. This Observation concerns only the substation application. I do not oppose renewable energy infrastructure in principle. However, the solar farm and battery storage are the subject of a separate application, and the substation is permanent. It would remain in place if the solar farm were decommissioned after 40 years. It must therefore be assessed on its own merits as permanent infrastructure.

II. WATER POLLUTION

The site is crossed by the Carignass, Knocknappagh, Ballyleague, Ballygarvin and Youghal Park streams and the Tourig and Glendine rivers. These flow to the River Blackwater, a European designated site, and the Celtic Sea.

The applicant's own Construction and Environmental Management Plan (CEMP) accepts that there is a construction pollution risk from fuel, sewage and lubricant spillages (CEMP Section 2.4, p.9). The concern therefore arises from the applicant's own documents. The CEMP Spoil Management Plan (Appendix B, pp.3-4) refers to approximately 13,600 cubic metres of topsoil and 39,690 cubic metres of subsoil, with recontouring over 4.71 hectares. This would expose a large area to rainfall and generate silt and sediment runoff. CEMP Appendix F (Section 3.2) describes an extensive network of historic drains and unmapped channels draining to the River Tourig and on to the

Blackwater. That is a direct pathway downstream. 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, a locally very important aquifer. The CEMP classifies most of the site as high groundwater vulnerability, and extreme near rivers and to the south. Despite this, the design relies on infiltration, including a percolation area of 5m x 5m x 1.8m within the compound (CEMP Sections 3.2.2, 3.3 and 3.4). Two 33/220kV transformers will contain oil. The CEMP relies on a SuDS management train with an interceptor and soakaway. The applicant's own schedule of mitigation (CEMP Appendix C, Section 11.5.4.4, p.7) accepts that a risk of accidental spillages and leaks remains.

The construction controls are extensive, including silt fences, settlement tanks, flocculation, turbidity monitoring, 110% bunded fuel storage and daily pH testing (Appendix C, Sections 11.5.2-11.5.5; Appendix E, Section 3.2). Such a list reflects a substantial risk. The monitoring plan is also to be agreed with Cork County Council and Inland Fisheries Ireland before construction, so it is not available for scrutiny now.

I ask the Commission to require clarity on what water will reach the soakaway, how it will be treated before infiltration, and what would happen in the event of transformer or bund failure. Given the hydrological connection to the Blackwater, the Commission must be satisfied under Article 6(3) of the Habitats Directive that adverse effects can be excluded beyond reasonable scientific doubt.

III. HYDROLOGY AND FLOODING

The applicant's Appendix N (Land, Soils, Geology, Hydrology and Hydrogeology) describes a substation footprint of approximately 1.8 hectares. It states that the effect on land occupied by the substation and access tracks will be "moderate, adverse and permanent". It records excavation to approximately 3.6 metres, a combined substation and BESS cut and fill of approximately 25,013 cubic metres, and approximately 9,320 cubic metres of imported stone for a 400mm platform cap (Sections 1.4.1.2 and 1.4.1.3, pp.28-29). These are significant interventions in the existing soil and drainage regime.

The site is not within a mapped flood zone. However, Appendix N acknowledges that the adjacent Tourig_020 and Glendine_010 watercourses have mapped indicative flooding in low and medium probability zones. It also states that local knowledge indicates local flooding within the same sub-basin (Section 1.8.3, pp.49-51). The absence of a mapped flood zone beneath the compound is not the same as the absence of risk.

The 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% of the relevant micro-catchment. It acknowledges that without mitigation, flooding could occur on site or downstream, and that poor drainage design could create new preferential pathways and erosion (Section 1.9.1.1, pp.60-61). The real question is whether the works would worsen flooding elsewhere in the same system. I respectfully

ask the Commission to require site-specific evidence on this, including infiltration testing supporting the soakaway design, and a reconciliation of the differing earthworks volumes quoted across the application documents.

IV. ARCHAEOLOGY

Appendix R (Archaeology and Cultural Heritage Impact Assessment) assesses the wider renewable energy site. Its avoidance measures are written for a solar farm. The four geophysical anomalies (M1 to M4, in fields 22, 58, 63 and 66) are to be preserved by non-intrusive gabion or ballasted foundations and buffers. Those measures cannot apply to this compound. Drawing 300101185-DR-213 shows the compound formed by cut and fill, with a cut of 17,304 cubic metres, a fill of 34,669 cubic metres, and a finished level of 109.05m cut into rising ground. A platform of that kind cannot sit on gabion baskets. The report's reliance on reversibility and decommissioning also does not fit a permanent 220kV station.

The evidence that the compound has been surveyed is also not shown. The walkover of 14-16 May 2025 (paragraph 5.3) recorded only surface features. The geophysical survey under licence 26R0042 covered, in the words of paragraph 3.15, a significant portion of the site, not all of it, and south-western fields were omitted. The applicant does not state that the compound, tower bases or widened access sections lay within the surveyed area.

Monitoring during construction (paragraphs 6.34 and 6.35) is not an adequate substitute. Preservation in situ is preferred only "where feasible", and it will rarely be feasible on a platform that must be cut to a fixed level. Monitoring would in practice record what the excavator uncovers and then allow construction to proceed.

Paragraph 3.14 of Appendix R quotes Cork County Council's comments of 10 February 2026 on the solar application. The Council said the archaeological assessment was inadequate and that sub-surface assessment was required for the application to be examined. That does not decide this application, but it shows that the same developer, on the same lands, has been told that buried archaeology must be understood before a decision.

Paragraph 4.15 records a hillfort at Rath, CO067-001001, 490 metres west of the site boundary, occupying a commanding position in the landscape. I could not find any specific assessment of the effect of a permanent compound, lightning masts and new towers on its setting.

V. CONCLUSION

The applicant's own documents acknowledge pollution pathways to a European site and drinking water receptors, a measurable increase in runoff within a flood-affected sub-basin, and archaeological mitigation that does not match the works proposed. I respectfully ask the Commission to refuse permission. At a minimum, I ask the Commission to seek further information on the matters raised, including full sub-

surface archaeological assessment of the compound, towers and access, a setting assessment for CO067-001001, and detailed drainage, flood and spillage-risk evidence for the substation alone.

Thank you for considering this Observation.

Kind Regards,

Mona Stromsoe