Noreen Cronin & family
Ballydaniel
Lackaroe
Youghal
Co. Cork

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 make this Observation on behalf of myself and my family. Our home is less than 20 metres from the proposed development, and the proposed entrance would be about 15 metres from it. This Observation concerns only the substation application. Section 6.3 of Appendix H states that the station and loop-in will be handed to the network operator and not decommissioned, so it must be assessed as a permanent structure whatever happens to the separate solar farm. I do not object to renewable energy in principle, but I object to this location.

1. Hydrology and Flooding

Our home already floods in periods of very heavy rain, and the works will be at a slightly higher level than our property. Appendix N describes the effect on land occupied by the 1.8 hectare substation and access tracks as "moderate, adverse and permanent". It records excavation of up to about 3.6 metres and a combined substation and battery cut and fill of about 25,013 cubic metres. It 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. The applicant's own calculation shows a 1-in-100-year runoff increase of 0.016 to 0.185 cubic metres per second, up to about 4.15 percent of the micro-catchment. The absence of a mapped flood zone beneath the platform does not show an absence of risk to neighbouring homes. I understand that drainage investigations were carried out in dry summer conditions, which do not reflect how wet this ground is. I ask that site-specific evidence, including winter conditions, demonstrate that flooding will not worsen at my property and at the entrance.

2. Site Location and Alternatives

The entrance and the substation are too close to homes. The applicant's Appendix A refers to about 342 houses within 1.5 km. I can find no comparison of reasonable alternative locations along the 220kV route, and the only apparent basis for this site is landowner availability. Schedule 6 of the Planning and Development Regulations 2001, as amended, and the EPA guidelines on EIA Reports (2022) expect reasonable alternatives to be examined. Here there is no EIAR, only a screening report. If important information has been omitted or is too thin for the public to understand the environmental effects, that is a deficiency in the assessment and participation process. I have also not identified any letter of support from EirGrid. The local road is, in my view, unsuited to heavy goods vehicles. Residential amenity at the nearest homes would be significantly harmed.

3. Noise and Vibration

Construction noise will be severe for those nearby, and especially for residents with sensory sensitivities. The noise assessment on file does not address this application. Appendix S is written for the Greenhills Renewable Energy Park as a whole. The 5 m and 8 m distances in its Table 1.1 are distances to the energy park boundary, not to the substation platform on drawing 300101185-DR-213 or to the access. It gives no distance from the compound or access to any house. The BS 5228 test in section 1.2.5.1 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 the works at about 16 months, yet no level has been calculated for this platform, this access or the haul route to Site Access No. 1. The fill figures are also inconsistent. Drawing DR-213 gives 34,649 cubic metres in its summary and 36,649 in its notes, while section 5.5.6.1 gives 25,013 and says all excavated material will be reused. The drawing shows fill exceeding cut, so imported material and its traffic must be assessed.

4. Lack of Public Consultation

Articles 6(3), 6(4), 6(6) and 6(8) of the Aarhus Convention require reasonable time frames, participation at an early stage when options are open, access to relevant information, and due account of public comments. I ask the Commission to note that there was no meaningful consultation. Appendix A records newsletters to about 342 houses within 1.5 km and direct contact with 42 households within 1 km. It acknowledges that some letters were returned undelivered, and not every house received them. The August engagement consisted largely of pre-booked individual appointments, and further requests for one to one meetings from residents were not facilitated. Newsletter 2 stated that the layout was still being drafted. Residents raising visual concerns were told that photomontages would follow with the application. Much engagement therefore took place before the public could see the proposal now before the Commission. This Observation is my only effective means of being heard.

5. Emergency Risk and Fire

The station will include up to two 220 kV transformers, which the site notice describes as oil-filled and bunded, together with a diesel generator and fuel tank. Section 4.3 of the Planning and Environmental Report does not say "oil-filled" or "bunded". Schedule 7 of the Planning and Development Regulations 2001, as amended, refers to the risk of major

accidents and disasters. Section 3.7.8 of the EIA Screening Report and Table 4.1 rate that risk as low, but neither assesses a fire at the transformers or the diesel tank, and Appendix H does not do so either. Drawing 300101185-DR-200 states "Bunds to be fitted with TBC at Detailed Design". It gives no oil volume and does not show that transformer oil and firefighting water would be retained in a bund, rather than passing to the surface-water system and soakaways. There is also no fire-appliance swept path, gate width or turning assessment from Site Access No. 1 on the R634 to the transformer bays. Appendix M is the energy park traffic assessment, not an assessment of this route. Because the station is permanent, these matters should be demonstrated now.

6. Conclusion

For these reasons I respectfully ask the Commission to refuse permission. At minimum, I ask it to request further information on flood risk and runoff, alternatives, a noise and vibration assessment specific to this application, transformer oil and fire containment, and emergency access. I also ask that the public then be given a fresh opportunity to comment.

Is mise,

Noreen Cronin & family