Paddy Fitzgerald
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13th 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 am a farmer, and my home and grazing land lie very close to the proposed substation. My cattle graze the field that bounds the substation field. This observation concerns only the substation application. The substation is sought as permanent development. Section 6.3 of Appendix H states that it will be handed to the network operator and not decommissioned, so it must be assessed as a permanent feature of this landscape whatever happens to any solar farm.

Site selection and alternatives

The Planning and Development Regulations 2001, as amended, give effect to Directive 2014/52/EU. Schedule 6 requires an environmental impact assessment report to describe the reasonable alternatives studied and the main reasons for the choice made. The EPA guidelines on EIA reports (2022) are to the same effect. I could find no side-by-side comparison of alternative substation locations along the 220kV route in the application documents. The only reason I can identify for choosing this site is the willingness of the landowners. Land availability is not a substitute for a comparison against clear environmental criteria such as noise, water and residential impact.

The applicant's own documents show a significant impact on over 300 homes. Other locations on the same route might have affected far fewer. I also note that the application contains no letter of support from EirGrid or ESB Networks for this specific location. The drainage appendix also appears to rely on observations made in dry summer months, whereas this land is very wet and should be judged in winter conditions. Without a proper comparison, the choice of this site has not been justified.

Effects on my land and livestock

Mechanical noise from transformers and equipment, construction activity and night-time lighting will occur directly beside my cattle. I have seen no assessment of how noise, vibration or artificial light may affect grazing livestock at the boundary. Construction is also not a short-term matter here, given the scale of earthworks described below. I ask that the Commission require an operational noise assessment, a

lighting design and a construction noise assessment that address livestock and the nearest homes and farmland.

Fire and emergency access

The substation will include up to two 220kV transformers, switchgear, and a diesel generator with fuel tank (Planning and Environmental Report, section 4.3). The site notice describes the transformers as oil-filled and bunded. Section 4.3 uses neither word, and the oil volume is not stated anywhere I could find. Schedule 7 of the 2001 Regulations 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 and Table 4.1, rating the risk as "Low - Construction and operation - design to mitigate". That section deals with concrete, hydrocarbon spills from construction plant and site accidents. It does not assess a fire at the oil-filled transformers or the diesel tank, and Appendix H does not either.

Drawing 300101185-DR-200 shows a full-retention oil separator and soakaways on the surface-water system. It also states "Bunds to be fitted with TBC at Detailed Design", and the notes say the drawing is subject to change. Bund capacity is therefore not confirmed. The application does not show that firefighting water would be held in a bund rather than pass through the surface-water system to a soakaway. For my animals and my family, the question is what smoke, fire and contaminated run-off would mean on neighbouring land. The application does not answer it.

Access is a further gap. The only access is the new road from Site Access No. 1 on the R634, shown on drawing 300101185-DR-100B. By my estimate it runs for roughly a mile across private land, which is a matter the applicant should confirm. I could not find a fire-appliance swept path, a stated gate width or a turning assessment in section 4.3, Appendix H or drawing DR-100B. Drawing DR-210 shows the gate and fence detail but does not demonstrate that an appliance can pass. Appendix M is the traffic assessment for the Greenhills Energy Park, not for this route. The access is also described as unsuitable for heavy vehicles, and in wet winter conditions I doubt that any emergency vehicle could reach the transformer bays promptly.

Water pollution

The land is very wet, with springs running through the fields to the River Tourig and on to the River Blackwater, which is a European site. The CEMP itself recognises the pollution risk to watercourses, and Appendix F (section 3.2) describes an extensive network of historic and unmapped drains on the site. The works involve levelling 4.71 hectares, with approximately 13,600 cubic metres of topsoil and 39,690 cubic metres of subsoil to be handled (CEMP Appendix B, Spoil Management Plan). This will expose a large area to rainfall and create a clear risk of silt and sediment reaching the drains.

The site lies largely over the Glenville Groundwater Body, which the CEMP records as mostly of high vulnerability and extreme in places (sections 3.3 and 3.4). Despite this, the design relies on infiltration, including a 5m x 5m x 1.8m soakaway within the compound (section 3.2.2). The CEMP says oil and fuel will be managed through an interceptor and soakaway. This leaves a direct pathway to groundwater and to the Tourig if a transformer or bund fails. Appendix C (section 11.5.4.4) accepts that a risk of accidental spillage remains during operation. The extent of the construction controls proposed, including settlement tanks, silt fences, turbidity monitoring and double-skinned bowsers, shows how serious the risk is judged to be. Since the substation is permanent, so is this risk. I submit that the Commission must be satisfied, under Article 6(3) of the Habitats Directive, that there will be no adverse effect on the integrity of the Blackwater SAC. On the present material, I do not believe it can be.

Conclusion

The application has not shown that reasonable alternatives were considered, that a fire at the oil-filled plant can be managed, that emergency vehicles can reach it, or that the wet ground, the Tourig and the Blackwater are safe from pollution. I respectfully ask the Commission to refuse permission. If it is minded to proceed, I ask it to seek further information on the alternatives assessment, oil volumes and confirmed bund capacity, firefighting water retention, a swept path analysis for the full access route, winter-condition drainage assessment, and noise and lighting effects on livestock.

Thank you for considering this observation.

Is mise,

Paddy Fitzgerald