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02nd November 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 homemaker and a resident living between 500 metres and 1 kilometre from the proposed site. This Observation concerns the substation application only. I do not oppose renewable energy infrastructure in principle. However, the solar farm and battery storage are a separate application, and the substation is to be permanent and handed to the network operator (Appendix H, section 6.3). It must therefore be assessed on its own merits as permanent infrastructure.

Hydrology and Flooding

Appendix N states that the substation footprint is about 1.8 hectares and that the effect on the land occupied by the substation and access tracks will be "moderate, adverse and permanent". It records excavation of up to about 3.6 metres and about 9,320 cubic metres of imported stone capping. It accepts that the site lies outside mapped flood zones. It also acknowledges that the adjoining Tourig_020 and Glendine_010 watercourses have mapped flooding, and that local knowledge indicates flooding within the same sub-basin. The Flood Risk Assessment calculates that a 1-in-100-year storm would produce a net increase in runoff of 0.016 to 0.185 cubic metres per second, up to about 4.15 percent relative to the micro-catchment. That is a measurable increase in a catchment where flooding already occurs. Absence of a mapped flood zone is not absence of risk. I ask the Commission to require site-specific evidence, including wet-season ground conditions, that downstream flooding will not be worsened.

Noise and Vibration

Appendix S is titled for the Greenhills Renewable Energy Park and covers the solar farm, battery compound and substation together. Table 1.1 gives distances of 5 m and 8 m to the energy park boundary. It gives no distance from the substation compound or its access to any house. The report applies the BS 5228 test of 65 dB at a house for more than 10 days in any 15, or 40 days in six months. Section 5.5.6.1 of the Planning and Environmental Report puts the substation works at about 16 months, so the duration limb would be met if the level is. That level has not been calculated for this platform, or for the access on

drawing 300101185-DR-100B. There is no EIAR. The earthworks figures are also inconsistent. Drawing 300101185-DR-213 gives a cut of 17,304 and a fill of 34,649 cubic metres. Its notes give 36,649 plus 9,490 of capping stone, while section 5.5.6.1 gives 25,013 and says all excavated material will be reused. On the drawing figures, fill must be imported, bringing heavy traffic onto the R634 that has not been assessed for this application.

Emergency Risk and Fire

The substation includes up to two transformers, described on the site notice as oil-filled and bunded, together with a diesel generator and fuel tank. Section 3.7.8 of the EIA Screening Report applies the Schedule 7 criterion on risk of major accidents and disasters. It addresses concrete, construction plant spills and site 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 diesel tank. The oil volume is not stated. Drawing 300101185-DR-200 notes bunds "to be fitted with TBC at Detailed Design" and shows a separator and soakaways, so it is not demonstrated that oil and firefighting water would be retained rather than passed to a soakaway. Nor is there a fire appliance swept path, gate width or turning assessment from Site Access No. 1 to the transformer bays. Appendix M is the Greenhills traffic assessment and does not address this route. These matters should be demonstrated now and not deferred.

Location and Alternatives

The documents I have reviewed do not show a comparison of reasonable alternative sites along the 220kV line, and the reasons given for this location appear to rest largely on landowner availability. Schedule 6 of the Planning and Development Regulations 2001, as amended, requires a description of reasonable alternatives studied, and EPA guidance expects a clear and comparative basis for site selection. I am not aware of any letter of support from EirGrid for this location. The local road network serving the site appears unsuitable for heavy goods and emergency vehicles in wet conditions. I also understand that the drainage assessment relied on survey conditions that may not reflect the wet state of the site. A substation intended to remain permanently should be justified against alternatives, including residential impact.

Water Pollution

The site drains through the Tourig and Glendine rivers to the River Blackwater, a European designated site. The CEMP acknowledges construction pollution risk and describes an extensive network of historic and unmapped drains. It also identifies EPA designated drinking water rivers as sensitive receptors. The site is largely underlain by the Glenville Groundwater Body, with high groundwater vulnerability across most of the site and extreme vulnerability to the south. Despite this, the design relies on a separator and soakaway, including an infiltration area of 5m x 5m x 1.8m within the compound. The CEMP Water Quality Monitoring Plan and the Schedule of Mitigation Measures (Appendix C, section 11.5.4.4) accept that a residual risk of spillage, leakage and overloading of surface water infrastructure remains. Where transformer oil is present, a bund failure or fire could create a direct pathway to groundwater and the Blackwater. I ask the Commission to be satisfied, in line with Article 6(3) of the Habitats Directive, that adverse effects on the integrity of the European site can be excluded beyond reasonable scientific doubt.

Conclusion

For these reasons, I respectfully ask the Commission to refuse permission. At a minimum, I ask that further information be requested on the matters above, namely:
- site-specific flood and drainage evidence
- substation-specific noise and vibration assessment
- oil volumes, bund and firefighting water details, and a fire appliance access assessment

- a comparison of reasonable alternatives
- a full assessment of the pollution pathway to groundwater and the Blackwater

Thank you for considering this Observation.

Sophie Walsh