Tomas Donnelly
Breeda Inch
Killeagh

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 am a farmer living between 500 metres and 1 kilometre from the proposed substation, and I object to this application. This Observation concerns only the substation and loop-in. The solar farm and battery storage are a separate application. However, the substation is to be permanent and will remain if the solar farm is decommissioned after 40 years, so it must be assessed as a lasting feature of this landscape.

Site Selection and Alternatives

The application is supported by an EIA Screening Report and there is no EIAR. For a 220kV station, that is a matter the Commission should examine closely. I could find no comparison of alternative locations along the 220kV route, no stated selection criteria, and no explanation for this site beyond landowner agreement. The EIA Directive 2014/52/EU, as transposed through the Planning and Development Regulations 2001, as amended, and the EPA guidance on EIA reports expect reasonable alternatives to be compared objectively. The applicant's own material shows significant effects on more than 300 homes, yet no alternative that might reduce this was presented. The file also does not show how alternatives were discussed in the pre-application consultation with Orsted. I could not find a letter of support from EirGrid or ESB Networks for this location. Appendix B on drainage appears to rely on work done in dry summer conditions, whereas this land is known locally to be wet. A fair assessment must be made in winter conditions.

Biodiversity and Animal Health

This site is not suitable for the wildlife that uses it, and the Blackwater SAC is acknowledged only indirectly. As a dairy farmer, I am seriously concerned that prolonged construction will displace wildlife and increase the risk of TB spreading to local herds. I have not found any assessment of this risk in the application.

Roads and Construction Traffic

The local roads are narrow and not suitable for heavy construction traffic. I already find it difficult to move farm machinery safely on them. The application describes about 16 months of substation works

(Planning and Environmental Report, section 5.5.6.1) and the delivery of two transformers of about 150 tonnes. The fill figures cannot be reconciled. Drawing 300101185-DR-213 gives a cut of 17,304 m3 and a fill of 34,649 m3, while its notes give 36,649 m3 plus 9,490 m3 of capping stone. Section 5.5.6.1 gives 25,013 m3 and says all excavated material will be reused. On the drawing's figures, a large volume of fill and stone must be imported, and that traffic will use the access shown on drawing 300101185-DR-100B and the R634. Its effect on road users, farm traffic and milk collection has not been properly assessed.

Noise and Vibration

The noise assessment relied on, Appendix S, is titled for the Greenhills Renewable Energy Park and covers the solar farm, trenching and battery compound as well as the substation. It is not an assessment of this application. The closest distances in Table 1.1, 5 m and 8 m, are distances to the energy park boundary, not to the substation platform, and no distance from the compound or access to any house is given. The report's own BS 5228 test is 65 dB at a house for more than 10 days in 15, or more than 40 days in six months. With works of about 16 months, the duration limb of that test would clearly be met, but the noise level has not been calculated for this platform, this access or the haul route. The conclusions in Chapter 15 and in section 3.7.6 of the screening report therefore do not demonstrate compliance. Prolonged noise and vibration will cause distress to residents and to livestock.

Visual Impact

Farmland and green fields are central to this area and to my community. The LVIA by Macro Words Ltd accepts that residents are highly sensitive receptors and notes several dwellings around the substation. Yet the viewpoint analysis centres on solar panels, not on the substation. VP4 and VP5 represent residential views but discuss panels, hedgerows and screening. There is no dedicated residential assessment of the 22,631.71 m2 compound, the 2.6 m fence, the lighting, the transformers, or the lightning masts of about 18 m and lattice structures of 37.5 m. Screening that conceals a panel of 3.4 m cannot be assumed to conceal masts of that height. No ZTV analysis or photomontage from the nearest homes has been provided for these structures. The LVIA also relies on new planting with a three-year establishment period, without showing views on completion, after 10 years, or in winter.

Fire and Emergency Risk

The station will include two oil-filled transformers, a diesel generator and a fuel tank. Section 3.7.8 and Table 4.1 of the screening material rate major accident risk as low, but neither assesses a fire at the transformers or the diesel tank, as Schedule 7 of the Regulations would lead one to expect. The oil volume is not stated. Drawing 300101185-DR-200 says bunds are to be fitted "TBC at Detailed Design", and shows a separator and soakaways without showing that firefighting water would be retained. Nor does the application include a fire appliance swept path from Site Access No. 1 to the transformer bays, a gate width or a turning assessment. Appendix M concerns the energy park, not this route. A fire at this station could affect my livestock, my land and my ability to have milk collected, which is my livelihood. Because the station is permanent, these matters should be resolved before permission is considered, not left to detailed design.

Conclusion

For these reasons, I respectfully ask the Commission to refuse permission. At a minimum, I ask that further information be requested on the following: a genuine comparison of alternative sites; a noise and vibration assessment specific to this station and access; a reconciled earthworks and traffic assessment; a residential visual assessment with ZTV analysis; a full fire and bund strategy with fire appliance access; and an assessment of wildlife and animal health risks.

Thank you for considering my Observation.

**Is mise,**

**Tomas Donnelly**