Bernadette Keniry
Ballykilty
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Cork

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 resident living between 1 and 5 km from the proposed development, and I make this Observation on the application. It concerns the substation, loop-in grid connection and related works only. The solar farm and battery storage are the subject of a separate application. However, the substation is to be permanent. It will be handed to the network operator and will remain if the solar farm is decommissioned. It must therefore be assessed on its own merits and for its full lifetime.

1. Lack of Regulation

The Commission is the competent authority under Directive 2011/92/EU, as amended by Directive 2014/52/EU (the EIA Directive). I respectfully ask that the Commission carry out its own independent screening and assessment and not rely solely on documents prepared by the applicant. Before any permission is granted, the Commission should be satisfied that:
- likely significant effects have been identified at an early stage
- cumulative effects with the wider Greenhills proposal have been fully assessed
- no reasonable scientific doubt remains

National practice cannot dilute these obligations.

I also note that the Minister has accepted there are no specific national guidelines for utility scale energy projects. In that gap, the Commission must weigh this application carefully against competing considerations. Section 15(1) of the Climate Action and Low Carbon Development Act 2015 requires the Commission to have regard to climate objectives only "insofar as practicable". It does not create an entitlement to permission for energy infrastructure. Landscape, ecology, cumulative impact, loss of agricultural land, amenity, heritage and infrastructure constraints must each be weighed, and the reasons for any decision clearly set out. I also understand that two planning applications have been marked invalid by Cork County Council. The local planning authority's role in deciding where such infrastructure is appropriately located deserves real weight.

2. Lack of Public Consultation

The applicant relies on Appendix A, the Summary of Engagement 2025. In my respectful view, that document shows engagement that was geographically narrow and limited in form.

Newsletter 1 in February 2025 was delivered to approximately 342 houses within 1.5 km of the general site area. Forty-two households within 1 km were spoken to directly. In August 2025 invitations were posted to 334 houses within 1.5 km for which address information was available. The applicant acknowledges that some of these letters were returned undelivered by An Post because they did not carry a resident's name. No reason is given for choosing 1.5 km as the boundary. The effects of a substantial 220kV substation do not stop at a fixed radius. Landscape and visual effects, construction traffic, use of local roads and cumulative effects may be felt by households further away, including those, like mine, between 1 and 5 km from the site.

The form of engagement also matters. The August sessions at Inch Community Centre largely consisted of pre-booked individual appointments. The applicant records 36 face-to-face meetings on the first two days, two virtual meetings and eight further appointments arranged afterwards. I understand that other residents asked for one-to-one meetings and were not facilitated. Individual meetings are not the same as an open public meeting, where the whole proposal can be presented and shared concerns about scale and cumulative impact can be discussed.

Finally, much of the engagement took place before the design was settled. Newsletter 2 stated that the site layout was still being drafted and that the material shown was a study area. After Newsletter 3, residents raised concerns about scale and visual effects. They were told that photomontages would follow with the planning application. Consultation on a concept is not informed participation in the development finally submitted for consent. The public could not comment on the completed layout, assessments and photomontages that the Commission now has before it.

3. Emergency Risk and Fire

The substation will include up to two 220 kV 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 does not use the words "oil-filled" or "bunded".

Schedule 7 of the Planning and Development Regulations 2001, as amended in 2018, 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. That section deals with concrete, hydrocarbon spills from construction plant and construction-site accidents, and concludes that no change in accident risk is expected. Table 4.1 rates the risk as "Low - Construction and operation - design to mitigate." Neither section 3.7.8 nor section 4.3 assesses a fire at the oil-filled transformers or the diesel tank. Appendix H, the outline construction methodology, does not do so either.

Drawing 300101185-DR-200 shows a full-retention oil separator and soakaways on the surface-water system. It states "Bunds to be fitted with TBC at Detailed Design" and is marked as subject to change. The oil volume is not stated on the site notice, in section 4.3 or on that drawing. Nothing shows that a bund would retain transformer oil together with firefighting water, rather than allow contaminated water to pass to a soakaway. Rainwater harvesting is shown, but it is not described as a firefighting supply.

Emergency access is also unaddressed. The only access sought is the new entrance, Site Access No. 1 on the R634, shown on drawing 300101185-DR-100B. Because the station will outlast the solar farm, this is the route a fire appliance would have to use. The application includes no fire-appliance swept path from that entrance to the transformer bays, no stated gate width and no turning assessment. Drawing

300101185-DR-210 is a gate and fence detail only. Appendix M, the traffic assessment, does not assess this route.

A permanent facility of this kind should demonstrate now, and not at detailed design, how a fire would be managed, including oil volume, bund capacity, retention of firefighting water and emergency access.

Conclusion

For these reasons, I respectfully ask the Commission to refuse permission. At a minimum, I ask the Commission to request further information on the matters raised above, and to ensure that the public has a proper opportunity to consider the responses.

Thank you for considering this Observation.

Is mise,

Bernadette Keniry