Bronagh Jacob
Babbling Brook
Barnaviddane Inch
Killeagh Co.
Cork

17th 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 live in the village of Inch, between 200 and 500 metres from the proposed development. I make this observation on the substation application only. I do not object to renewable energy in principle. My concern is that a permanent 220kV substation is proposed without adequate assessment of its own effects. The substation is to be handed to EirGrid and will remain if the separate solar farm is decommissioned.

1. Lack of Regulation and the Need for Proper Assessment

There are no specific planning guidelines for substations of this kind, and the Minister has accepted that guidance on utility scale energy development is lacking. In that vacuum, the Commission must not treat climate targets as a substitute for assessment. Section 15(1) of the Climate Action and Low Carbon Development Act 2015 requires the Commission to act only "insofar as practicable", so it must weigh landscape, amenity, ecology and infrastructure constraints in the balance.

There is no EIAR with this application. The EIA Screening Report (sections 3.7.6 and 3.7.8) relies on conclusions that were written for the wider energy park. Under Directive 2011/92/EU as amended by 2014/52/EU, the Commission is the competent authority. It should carry out its own independent screening and should not rely on the applicant's documents alone. That screening should address cumulative effects and any scientific doubt. In my view the substation, as a permanent project, requires a full EIAR.

2. Noise and Vibration

My home is at a similar ground level to the site, so noise will carry. My wife works from home full time, and a construction period of this length will seriously affect her ability to work and our wellbeing at home.

The noise assessment on file (Appendix S) was prepared for the Greenhills Renewable Energy Park as a whole, not for this substation. Table 1.1 gives distances of 5 m and 8 m, but these are measured to the energy park boundary. They are not measured to the platform on drawing 300101185-DR-213, and the report gives no distance from the compound or access to any house. The report adopts the BS 5228 significance test at section 1.2.5.1, which applies at 65 dB where works last more than 10 days in any 15 or 40 days in any six months. Section 5.5.6.1 of the Planning and Environmental Report gives about 16 months for the substation works, so the duration limb of that test would be met. The noise level at nearby houses has not been calculated for this platform or its access, and the 23 to 45 dB range in Table 1.28 is not such a calculation. Compliance has therefore not been demonstrated.

The earthworks figures are also inconsistent. Drawing DR-213 shows 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 states that all excavated material will be reused. On the drawing's own figures, fill must be imported. The capping stone and two transformers of about 150 tonnes each will also arrive by road. The number of HGV movements past our homes, and the resulting noise and vibration, has not been assessed for the access on drawing 300101185-DR-100B or for the R634.

3. Emergency Risk and Fire

The application includes up to two transformers, which the site notice describes as oil-filled and bunded, and also a diesel generator and fuel tank. Schedule 7 of the Planning and Development Regulations 2001, as amended, requires consideration of the risk of major accidents and disasters. Section 3.7.8 of the screening report and Table 4.1 rate that risk as low, but neither assesses a fire at the transformers or the diesel tank. Section 4.3 does not use the words oil-filled or bunded.

Drawing 300101185-DR-200 states "Bunds to be fitted with TBC at Detailed Design". The oil volume is not stated anywhere I could find. The drawing shows a separator and soakaways on the surface-water system. It does not show that contaminated firefighting water would be retained in the bunds rather than passed to a soakaway. For a station that will never be decommissioned, these matters should be settled now and not deferred.

The application also contains no fire appliance swept path from Site Access No. 1 to the transformer bays, no stated gate width and no turning assessment. Appendix M is the traffic assessment for the Greenhills energy park and does not cover this route. Because the substation is proposed beside a separate battery storage and woodland setting, the Commission should also consider the cumulative fire risk, even though that separate application is not before it here.

4. Hydrology and Flooding

Inch was badly flooded during Storm Babet in 2023. The River Tourig burst its banks and ran onto the road outside my home. Any increase in runoff from the valley above the village is therefore a real concern to me.

The applicant's own Appendix N states that the substation footprint is about 1.8 hectares and that the effect on 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 25,013 m3 of cut and fill, and imports of stone for capping. It accepts that the Tourig_020 and Glendine_010 watercourses adjacent to the site have mapped

flooding. It also notes that local knowledge indicates flooding within the same sub-basin. The Flood Risk Assessment calculates a net runoff increase of about 0.016 to 0.185 m3/s in a 1-in-100-year event, up to approximately 4.15 percent of the relevant micro-catchment. Appendix N further accepts that construction activity could lead to flooding on site or downstream without mitigation.

The absence of a mapped flood zone beneath the platform does not show that downstream risk is absent. A measurable increase in runoff, on ground that I observe to be frequently waterlogged and directly upstream of a village that has flooded, requires site-specific evidence. That evidence should address the effect on flow paths, groundwater, storage and the timing of flows into the Tourig, including during the construction phase and during storm conditions.

5. Conclusion

For these reasons I respectfully ask the Commission to refuse permission. In the alternative, I ask it to require a full EIAR and to seek further information on the following:
- noise and vibration at the nearest houses for this platform and access
- reconciled earthworks and HGV figures
- the oil volume and the bund design
- fire and firefighting water management and fire appliance access
- a site-specific assessment of downstream flood risk

Thank you for considering this observation.

Is mise,

Bronagh Jacob