Carmel Whitford
Newtown House
Youghal Co.
Cork

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 General Practitioner and a resident of the area, living between 1 and 5 km from the proposed development. This Observation concerns the substation application only. The solar farm and battery storage are the subject of a separate application. However, the substation is permanent and would remain if the solar farm were decommissioned after 40 years, so it must be assessed as a permanent industrial installation.

Loss of Prime Agricultural Land

My main concern is the replacement of prime food producing and pasture land with utility scale energy infrastructure. The compound covers approximately 22,631 square metres and, according to drawing 300101185-DR-213, would be formed as a platform at 109.05 m by cut and fill. That is an irreversible change to productive land. The application does not explain why this land was chosen over land of lower agricultural value, or how its loss has been weighed against the benefits claimed. I ask the Commission to give real weight to this loss, to the effect on local wildlife, and to the legacy left to future generations.

Public Consultation

I received no contact from Orsted or from Perigus. The applicant's Summary of Engagement (Appendix A) shows that direct engagement was confined to about 342 houses within 1.5 km, with 42 households within 1 km spoken to directly. No justification is given for the 1.5 km radius, yet a 220kV station can affect people well beyond it through landscape, traffic and noise. The applicant also records that some August 2025 letters were returned undelivered because they carried no resident name, so not every household was reached. The August sessions at Inch Community Centre were largely pre-booked individual appointments rather than open public meetings, and I am aware that other requests for meetings were not facilitated. Newsletter 2 said the layout was still being drafted, and residents who raised visual concerns were told that photomontages would follow with the application. Much of the engagement therefore took place before the public could see the proposal now before the Commission. That is not meaningful participation.

Site Selection and Alternatives

Schedule 6 of the Planning and Development Regulations 2001, giving effect to Directive 2011/92/EU as amended by Directive 2014/52/EU, requires a description of the reasonable alternatives studied and the reasons for the option chosen, with a comparison of environmental effects. I can find no comparison of alternative substation locations along the 220kV route. The only reference is an indirect one to the Blackwater SAC. No criteria are set out and no sites are scored. The apparent driver is landowner agreement, which is a commercial convenience and not a planning rationale. The applicant's own material shows effects on over 300 homes, and alternatives may well have affected far fewer. The drainage work in Appendix B appears to reflect dry summer conditions, although the site is known to be wet. The access road is poorly suited to heavy goods vehicles and to emergency vehicles in wet weather. I have also seen no letter of support from EirGrid or ESB Networks for this specific site.

Water Pollution

Several streams cross the site, including the Carignass, Knocknappagh, Ballyleague, Ballygarvin and Youghal Park streams. These drain through the Tourig and Glendine rivers to the River Blackwater, a European designated site. The CEMP itself recognises the risk of fuel, lubricant and sewage pollution (Section 2.4, page 9) and identifies EPA designated drinking water rivers as sensitive receptors (Sections 3.1 and 3.5). The works involve about 13,600 cubic metres of topsoil and 39,690 cubic metres of subsoil over 4.71 hectares (Spoil Management Plan), leaving a large area exposed to rainfall and runoff. The site lies largely over the Glenville Groundwater Body, a locally important aquifer, with high and in places extreme vulnerability. Even so, the compound relies on infiltration and a soakaway (CEMP Sections 3.2.2, 3.3 and 3.4) and will hold two 33/220kV oil-filled transformers. The CEMP mitigation schedule in Appendix C accepts a residual risk of accidental spillage in operation. Private wells and a nearby public water source could be affected. The applicant should be required to show what will reach the soakaway, how it will be treated, and what happens if a transformer or bund fails. The Commission must also be satisfied, in its Appropriate Assessment, that there is no reasonable scientific doubt as to effects on the Blackwater.

Regulatory Context

I see no joined up approach between the agencies involved. Neither EirGrid nor ESB Networks has explained why this connection must be located on this land. The Commission is the competent authority under the EIA Directive and must reach its own independent view, including on cumulative effects, rather than rely on the applicant's documents alone. I note that there is no EIAR and that the application relies on screening. I ask the Commission to satisfy itself that this is lawful for a permanent 220kV station in this setting. Climate policy is important, but section 15(1) of the Climate Action and Low Carbon Development Act 2015 applies only insofar as practicable. It does not displace landscape, agriculture, ecology, heritage and amenity. I also understand that Cork County Council has previously marked two applications invalid, and the local planning authority's view on where such development belongs deserves respect.

Visual Impact

The LVIA uses 24 viewpoints and a 5 km study area. It accepts that residential receptors are highly sensitive and that several dwellings lie around the substation (page 28), yet it contains no dedicated residential assessment of the substation. Viewpoints VP4 and VP5 discuss houses but analyse the solar panels. The substation includes buildings of 438 and 590 square metres, two transformers, a 2.6 m fence, lighting, lightning masts of approximately 18 m, and lattice support structures recorded at 37.5 m. Screening arguments that work for panels no higher than 3.4 m cannot simply be transferred to structures

that may rise above hedgerows. No ZTV analysis or visualisation from the nearest houses addresses this. Reliance on planting with a three year establishment period, without winter or year ten views, does not demonstrate the true effect. I see no evidence that the applicant tried to reduce the scale of these structures.

Archaeology

The avoidance measures in Appendix R are solar measures. The four geophysical anomalies M1 to M4 are to be preserved by gabion or ballasted foundations, but drawing 300101185-DR-213 shows a compound formed by a cut of 17,304 cubic metres into rising ground. A platform of that kind cannot sit on gabions. The geophysical survey under licence 26R0042 covered a significant portion of the site, not all of it, and the applicant does not state that the compound, tower bases or access widening lay within the surveyed area. Monitoring during construction (paragraphs 6.34 and 6.35) comes too late for a platform that must be cut to level, where preservation in situ will not be feasible. Cork County Council told this applicant on 10 February 2026, in respect of the solar application, that sub-surface assessment was needed before a decision (paragraph 3.14). The permanent substation should not be held to a lower standard. The hillfort CO067-001001 in Rath townland, 490 m west of the site boundary, is described but its setting is not assessed against a permanent compound, masts and towers.

Noise and Vibration

Appendix S assesses the Greenhills energy park as a whole. The closest distances in Table 1.1, of 5 m and 8 m, are to the energy park boundary and not to this platform or access. No distance from the compound or access to any house is given. The BS 5228 test at section 1.2.5.1 is 65 dB at a house for more than 10 days in 15, or 40 days in six months. Section 5.5.6.1 puts the substation works at about 16 months, so the duration test is met if the level is. That level has not been calculated for this platform or access. Fill volumes are also inconsistent. Drawing DR-213 gives a cut of 17,304 cubic metres with a larger fill, its notes give 36,649 cubic metres plus 9,490 cubic metres of capping stone, and Section 5.5.6.1 of the Planning and Environmental Report gives 25,013 cubic metres and says all excavated material will be reused. Imported material means heavy traffic on the access and the R634. Operational noise is described as not significant without an assessment specific to the station. Homes further away, particularly downwind, may experience adverse effects on sleep and wellbeing, and as a General Practitioner I regard this as a genuine health concern. Effects of noise and vibration on wildlife are not properly assessed, and I ask the Commission to consult the National Parks and Wildlife Service.

Conclusion

For these reasons I respectfully ask the Commission to refuse permission. At a minimum, I ask it to request further information on alternatives, residential visual effects, sub-surface archaeology, drainage and groundwater protection, and noise and vibration specific to the station and its access, and to require proper public engagement before any decision.

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Carmel Whitford