Ballydaniel
Lackaroe
Youghal
Co Cork

30th 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 less than 50 metres from the proposed development, beside the location of the proposed new entrance on the R634 (Youghal-Tallow Road). This Observation concerns the substation application only. The solar farm and battery storage are a separate application, but the substation is sought as permanent development that would remain after any decommissioning of the solar farm, and it must be assessed on that basis. I do not object to renewable energy in principle. My concern is the suitability of this site and the adequacy of the assessment.

I. WATER POLLUTION AND PRIVATE WELLS

My home relies on its own well. Most of my neighbours and I have already had water quality problems linked to the current agricultural use of the adjoining field, and we have had to install filters. Further disturbance of this land could make matters worse.

The applicant's own documents acknowledge the risk. The CEMP states that pollution prevention measures are required so that runoff is not contaminated by fuel, sewage or lubricants. The Spoil Management Plan (CEMP Appendix B) describes about 13,600 cubic metres of topsoil and 39,690 cubic metres of subsoil being recontoured over 4.71 hectares, exposing a large area to rainfall and sediment runoff. The CEMP records an extensive network of historic and unmapped drains leading to the River Tourig and on to the River Blackwater, a European designated site. It also identifies the Glenville Groundwater Body, a locally important aquifer, with high groundwater vulnerability across most of the site and extreme vulnerability in places.

Despite this, surface water is to be managed by infiltration, including a soakaway of 5m x 5m

x 1.8m within the compound. Two 33/220kV transformers containing oil will be present, and the Water Quality Monitoring Plan (CEMP Appendix C, Section 11.5.4.4) accepts a residual risk of accidental spillage and leaks. It is not explained what water will reach the soakaway, how it will be treated, or what protects private wells nearby. I ask the Commission to require a survey and baseline monitoring of private wells near the site and a clear assessment of the risk to groundwater.

II. HYDROLOGY AND FLOODING

My house sits lower than the field where the entrance is proposed, and we already experience flooding in heavy rain. Appendix N (Land, Soils, Geology, Hydrology and Hydrogeology) records excavation of up to about 3.6 metres at the substation and describes the effect on land occupied by the substation and access tracks as moderate, adverse and permanent. Its Flood Risk Assessment calculates a net increase in runoff in a 1-in-100-year event of about 0.016 to 0.185 cubic metres per second, up to approximately 4.15 percent of the relevant micro-catchment. Appendix N also acknowledges mapped flood zones along the Tourig_020 and Glendine_010 watercourses and states that local knowledge indicates flooding within the same sub-basin (Section 1.8.3).

The absence of mapped flooding under the platform does not mean there is no risk to neighbouring land. A site that is frequently wet and sloping toward lower-lying homes needs site-specific evidence that the new hardstanding, the platform and the entrance works will not redirect or concentrate water toward existing houses. I ask that the applicant be required to provide this, including assessment under winter and saturated conditions.

III. NOISE AND VIBRATION

The noise assessment on file (Appendix S) is titled for the Greenhills Renewable Energy Park and covers the solar farm, battery compound and substation together. The distances in its Table 1.1 are to the energy park boundary, not to the substation platform shown on drawing 300101185-DR-213 or to the access shown on drawing 300101185-DR-100B. No distance from the compound or the access to any house is given. The BS 5228 criterion cited in the report is 65 dB at a dwelling for more than 10 days in any 15, or more than 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 test would be met if the level is. That level has not been calculated for these works.

The volumes of fill are also inconsistent. Drawing 300101185-DR-213 shows a cut of 17,304 cubic metres and a fill of 34,649 cubic metres, its notes give 36,649 cubic metres plus 9,490 cubic metres of capping stone, and Section 5.5.6.1 gives 25,013 cubic metres. On any of these figures material must be imported, with the associated heavy traffic passing the entrance beside my home.

I am also aware of reports that on other projects by this developer, noise limits were exceeded and working hours extended without permission. I ask the Commission to require a proper assessment of these works and, if permission is granted, strictly enforceable limits on noise, vibration and hours.

IV. CUMULATIVE EFFECT

Planning applications have also been lodged for 21 wind turbines about 2km north of my home, including a further 220kV substation, and for 23 turbines about 10km away. A 110kV substation has been permitted under PA04.309121. Cork County Council previously asked, under Planning Ref. 25/6876, for cumulative assessment of the solar farm and the permitted Lyrenacarriga Wind Farm, and I understand the later submission under Planning Ref. 26/2133 did not adequately provide it. Construction traffic for separate substations is also proposed to use the R634, so overlapping impacts of traffic, noise, dust and disturbance on residents should be assessed together. Splitting related projects into separate applications should not allow their combined burden on one small community to go unassessed.

V. SITE LOCATION, ALTERNATIVES AND ROAD SAFETY

I cannot find a comparison of reasonable alternative sites along the 220kV route, and there is no EIAR. Where a project is assessed under the EIA Directive (2014/52/EU), reasonable alternatives and the reasons for the chosen option must be addressed. Even outside that process, the Commission should be satisfied that this location was chosen on planning merits and not simply availability of land. The proposed development also lies in a catchment draining to the River Blackwater, so the requirements of Article 6(3) of the Habitats Directive must be fully met.

Site Access No. 1 is on a busy stretch of the R634, with an 80km/h limit that I regularly see exceeded, where the road is only just straightening after a series of bends. Heavy construction deliveries and transformer transport turning in and out here, beside my driveway, raise a serious risk of collisions. I ask that sightlines, stopping distances, turning movements and a Road Safety Audit be required and independently reviewed.

VI. CONCLUSION

For these reasons, I respectfully ask the Commission to refuse permission. At a minimum, I ask that further information be requested on private well protection, drainage and flood risk to adjoining homes, noise and vibration assessment specific to these works, cumulative effects, alternatives, and access safety on the R634.

Thank you for considering this Observation.

Is mise,

Catherine Lackey