Catherine Mason
Knocknagappagh
Inch
Killeagh
Co. 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 live between 300 metres from the proposed substation site and wish to make this Observation. It concerns the substation application only. The substation is permanent infrastructure and would remain in place even if the separate solar farm were decommissioned after 40 years, so its effects should be assessed on that basis.

Water Pollution and Private Wells

My water comes from a private well very close to the site, so protection of groundwater is a direct concern. The applicant's own Construction and Environmental Management Plan (CEMP) acknowledges a construction pollution risk and states that the programme must address risks to watercourses in each phase (CEMP Section 2.4, page 9). The site is crossed by an extensive network of historic and unmapped drains that lead to the River Tourig and on to the River Blackwater, a European designated site (CEMP Appendix F, Section 3.2). The CEMP also identifies EPA designated drinking water rivers as sensitive receptors (Sections 3.1 and 3.5).

The works involve cut and fill of approximately 13,600 cubic metres of topsoil and 39,690 cubic metres of subsoil across 4.71 hectares (Appendix B, Spoil Management Plan, pages 3 and 4). This exposes a large area to rainfall and creates an obvious risk of silt and sediment in runoff. The site lies largely over the Glenville Groundwater Body, a locally important aquifer. The CEMP classes most of the site as high groundwater vulnerability, and extreme close to rivers and to the south (Sections 3.3 and 3.4). Even so, the design relies on infiltration and soakaway drainage, including an infiltration area of 5m x 5m x 1.8m within the compound (Section 3.2.2).

Two 33/220kV transformers will hold transformer oil on site, and the CEMP relies on an interceptor and soakaway for oil and fuel. The Water Quality Monitoring Plan itself accepts that a risk of accidental

spillage, leaks and overloading of surface water infrastructure remains despite mitigation (Appendix C, Section 11.5.4.4). The scale of the proposed controls, including silt fences, settlement tanks, turbidity monitoring and daily pH testing (Appendix C, Sections 11.5.2 to 11.5.5; Appendix E, Section 3.2), shows how substantial the risk is. I respectfully ask the Commission to establish exactly what water will reach the soakaway, how it will be treated beforehand, and how private wells and the Blackwater designated site will be protected. The monitoring plan is also still to be agreed with Cork County Council and Inland Fisheries Ireland, which leaves key safeguards undefined at this stage.

Site Location, Alternatives and Flood Risk

The site is a wide open area that cannot realistically be screened. It sits close to the valley of Inch, where many families live and where I am concerned about flood risk. I understand the site suffers wetland conditions. Major regrading, hard surfacing and concentrated drainage on such land could worsen runoff downstream. I ask the Commission to be satisfied, through a site specific flood risk assessment, that the risk to the valley will not increase.

The EIA Directive (2011/92/EU as amended by 2014/52/EU), as transposed through the Planning and Development Regulations 2001 including Schedule 6, requires an EIAR to describe the reasonable alternatives studied and the reasons for the option chosen. I could not find a comparison of alternative sites along the 220kV route in the application documents. The only apparent basis for selection is landowner agreement, which is a commercial consideration and not a planning rationale. The applicant's own documents show a significant impact on more than 300 homes, and a properly compared alternative might have reduced this considerably. Drainage investigations also appear to have been carried out during dry summer periods, which is not a worst case for a site of this character.

Access is by a new entrance from the R634. I am concerned that the approach roads are unsuited to heavy goods vehicles and abnormal loads, and that emergency vehicles would struggle in wet conditions. I also could not find any letter of support or confirmation of suitability from EirGrid or ESB Networks for this particular location.

Lack of Regulation

There is no up to date national guidance specific to utility scale energy infrastructure, and I understand the Minister has accepted this. In that vacuum, decisions risk being made without clear, consistent criteria for siting, scale and protection of nearby residents. Section 15(1) of the Climate Action and Low Carbon Development Act 2015 imposes only a qualified duty to act insofar as practicable. Climate objectives therefore do not remove the need to weigh landscape, water, amenity, infrastructure capacity and cumulative impact against the proposal.

As competent authority under the EIA Directive, the Commission must carry out its own independent assessment and must not rely solely on documents prepared by the applicant. I also understand that two related applications were invalidated by Cork County Council. The local authority is best placed to judge where such infrastructure belongs in its functional area, and its role should not be bypassed. I respectfully submit that, until clear guidance exists, the Commission should take a precautionary approach.

Cumulative Effect

This substation cannot sensibly be assessed in isolation. A 110kV substation has already been permitted

approximately 4 km away (PA04.309121), and the permitted Lyrenacarriga Wind Farm lies close to my home, with 17 turbines less than 2 km away. The associated solar farm of approximately 800 acres is proposed under a separate application. Cork County Council asked, under Planning Ref. 25/6876, for a cumulative landscape and visual assessment of the solar farm and the wind farm. I understand the later submission under Planning Ref. 26/2133 did not adequately provide it, and did not properly take this 220kV substation into account.

Construction traffic for the substations is proposed to use the R634. Overlapping programmes could combine heavy goods vehicles, abnormal loads, noise, dust and road safety risks for local residents and road users. These effects should be assessed together, both spatially and over time, regardless of the use of separate applications.

There is also a wider concern. A 220kV connection point in this area makes further large energy proposals more likely, and each would be assessed against an ever larger baseline unless the cumulative position is addressed now.

Conclusion

For these reasons I respectfully ask the Commission to refuse permission. At a minimum, I ask that it request further information on groundwater and surface water protection, flood risk, a genuine comparison of reasonable alternative sites, the suitability of the access route, and a full cumulative assessment of all permitted and proposed energy infrastructure in the area.

Thank you for considering this Observation.

Is mise,

Catherine Mason