Eileen Kennedy
Ballyglavin Lackaroe
Youghal

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,

Introduction

I am a retired resident who has lived in this area all my life, as have several generations of my family. My home is between 1 and 5 km from the site and is served by a private well. My grandchildren attend the nearby Park School. My main concern is the effect on living conditions locally, including my own home. This observation concerns the substation application only. The solar farm and battery storage are a separate application. However, the substation is sought as permanent development that would remain if the solar farm were decommissioned after 40 years, and it must be assessed on that basis.

Water Pollution and Protection of Drinking Water

The water at my home is tested regularly and is of a very high standard. The applicant's own documents show why this site is a poor choice. The CEMP records that the Carignass, Knocknappagh, Ballyleague, Ballygarvin and Youghal Park streams cross the site and drain through the Tourig and Glendine rivers to the River Blackwater, a European designated site. It also records an extensive network of historic and unmapped drains (CEMP Appendix F, Section 3.2). It identifies EPA designated drinking water rivers as sensitive receptors (CEMP Sections 3.1 and 3.5). The site lies largely over the Glenville Groundwater Body, a locally important aquifer. Vulnerability is mostly high and extreme in places to the south (CEMP Sections 3.3 and 3.4).

The works involve major cut and fill across 4.71 hectares, with about 13,600 cubic metres of topsoil and 39,690 cubic metres of subsoil (CEMP Appendix B, Spoil Management Plan). This exposes the ground to rainfall and silt-laden runoff. In operation, two 33/220kV transformers will contain oil, and surface water is to go to an infiltration area within the compound (CEMP Section 3.2.2). The Schedule of Mitigation Measures (CEMP Appendix C, Section 11.5.4.4) accepts that a risk of accidental spillage, leaks and overloaded drainage remains. Infiltration into highly vulnerable ground is a direct pathway to groundwater that supplies private wells and public schemes. I ask the Commission to require full details of what water will reach the soakaway, how it will be treated, and what would happen in a transformer or bund failure. I also ask that the implications for the Blackwater be examined under Article 6(3) of the Habitats Directive.

Site Location and Alternatives

The EIA Directive (2011/92/EU as amended by 2014/52/EU), as transposed through the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended), requires a description of reasonable alternatives and a comparison of their environmental effects. There is no EIAR on this file, only a screening report. I can find no comparison of other locations along the 220kV line. The only apparent basis for the site is the agreement of the landowner, which is not a planning criterion. The applicant's documents acknowledge effects on over 300 homes, and a properly tested alternative might have reduced that.

The site is also close to the Park School and to many family homes. Access is by a new entrance from the R634, and the local road network is poorly suited to heavy goods vehicles and transformer deliveries. I am concerned that emergency vehicles would struggle in wet conditions, which are common on this site. The drainage studies appear to have been carried out in dry summer conditions. I also believe that agricultural land should not be used for a substation when other options exist along the line. I have seen no letter of support from EirGrid for this location.

Noise and Vibration

I live close enough that I am concerned about noise affecting my home, with a substation operating continuously. The noise assessment on file does not address this application. Appendix S is titled for the Greenhills Renewable Energy Park and covers the solar farm, trenching, the battery compound and the substation together. Table 1.1 gives distances to the energy park boundary, such as 5 m and 8 m. These are not distances from the substation platform shown on drawing 300101185-DR-213, and the report gives no distance from the compound or its access to any house. Chapter 15 of the Planning and Environmental Report and Section 3.7.6 of the EIA Screening Report rely on that assessment to conclude that impacts are temporary or not significant.

The report's own test, taken from BS 5228, is a level of 65 dB or more at a house for more than 10 days in any 15, or more than 40 days in six months. The substation works are expected to last about 16 months (Planning and Environmental Report, Section 5.5.6.1), so the time element would be met if the level is. That level has not been calculated for this platform or its access. The fill figures are also inconsistent. Drawing 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. The Planning and Environmental Report gives 25,013 cubic metres and says all excavated material will be reused. On the drawing figures, material must be imported, and that means heavy traffic on the access shown on drawing 300101185-DR-100B and on the R634. The traffic noise and vibration from this have not been assessed for the substation.

Public Consultation

Meaningful public participation is required under the Aarhus Convention and the EIA Directive. Appendix A, the Summary of Engagement, shows that direct contact was limited to about 342 houses within 1.5 km, with 42 households within 1 km spoken to directly. It acknowledges that some letters were returned undelivered. The August sessions consisted largely of pre-booked individual appointments rather than open public meetings. I am aware that others requested one-to-one meetings and were not accommodated. Newsletter 2 stated that the layout was still being drafted. Much of the engagement therefore took place before the layout, photomontages and technical assessments were available. In my own case, we received a leaflet and nothing more. Nothing in the engagement summary separates the permanent substation from the wider energy park, so residents were not given a clear opportunity to comment on it.

Conclusion

For these reasons, I respectfully ask An Coimisiun Pleanala to refuse permission. The proposal presents an unquantified risk to groundwater and drinking water, lacks a reasoned assessment of alternatives, has no noise and vibration assessment of the permanent works, and followed inadequate public participation. At a minimum, I ask the Commission to seek further information on each of these matters and to allow the public to comment on the response.

Is mise,

Eileen Kennedy