Emmet Parker
Ballydaniel Lackaroe
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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 live within 1km of the proposed substation and wish to make this observation. It concerns the substation application only. Because the station is to remain permanently, and be handed to EirGrid even if the solar farm is decommissioned, it must be assessed as a permanent feature of this rural area.

Water Pollution
The site drains through the Carignass, Knocknappagh, Ballyleague, Ballygarvin and Youghal Park streams and the Tourig and Glendine rivers to the River Blackwater, a European designated site. The CEMP identifies EPA designated drinking water rivers as sensitive receptors, and the Tourig supplies Youghal's drinking water. Forming the platform involves about 13,600 m3 of topsoil and 39,690 m3 of subsoil over 4.71 hectares (CEMP Appendix B, Spoil Management Plan), which exposes a large area to rainfall and silt runoff. The CEMP describes an extensive network of historic and unmapped drains (Appendix F, section 3.2) that gives a direct pathway downstream.

The Glenville Groundwater Body, a locally important aquifer, underlies most of the site. The CEMP classes it as mostly high vulnerability and extreme in places to the south. Even so, surface water is to go to soakaways, including a 5m x 5m x 1.8m infiltration area in the compound. Two transformers will hold oil, and the applicant's own mitigation schedule accepts a residual risk of spillages, leaks and overloading of drainage in operation (CEMP Appendix C, section 11.5.4.4). The monitoring plan is still to be agreed with Cork County Council and Inland Fisheries Ireland. I ask the Commission to require the applicant to show exactly what water will reach the soakaways, how it is treated first, and how drinking water supplies are protected. The Commission must also be satisfied under Article 6(3) of the Habitats Directive that the Blackwater is not adversely affected.

Site Location and Alternatives
I can find no objective comparison of reasonable alternative sites along the 220kV route. The only reason for this site appears to be landowner agreement. The EIA Directive, as transposed through Schedule 6 of the Planning and Development Regulations 2001, and the EPA guidelines require reasonable alternatives to be compared against stated environmental criteria, including impacts on residents. The applicant's own documents show significant effects on a large number of homes, yet no less populated option along the same route is assessed. I also find no letter of support from EirGrid or ESB Networks for this location.

The application relies on an EIA Screening Report, not an EIAR, and I ask the Commission to consider whether that is adequate for a permanent 220kV station.

Access is a further concern. The access in this application runs north and then east to Site Access No. 1 on the R634 (drawing 300101185-DR-100B). The local road network is poorly suited to heavy vehicles. Appendix M is the Greenhills traffic assessment, not an assessment of this route, and it refers to delivering two transformers of about 150 tonnes each. The works will bring HGV traffic through a rural community with children.

Noise and Vibration
Appendix S is titled for the Greenhills Renewable Energy Park, and its scope is solar construction, trenching, the substation, the battery compound and their operation. It is not an assessment of this application. Table 1.1 gives distances only to the energy park boundary, such as 5m and 8m, and gives no distance from this compound or access to any house. The report's own BS 5228 test 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 part of that test would plainly be met. The level has not been calculated for this platform, this access or the haul route.

The earthworks figures are also inconsistent. Drawing 300101185-DR-213 gives 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 says all excavated material will be reused. These cannot be reconciled, and the amount of imported material, and so the number of lorry movements, is unclear. Residents cannot judge years of construction disturbance on these figures.

Visual Impact
The LVIA uses 24 viewpoints and accepts that residents are highly sensitive receptors. However, it is structured around the solar panels, which stand no higher than 3.4m. VP4 and VP5 represent dwellings, yet their discussion concerns panels, hedgerows and screening, not the substation. The substation has a compound of about 22,631 m2, a 438 m2 control building, a 590 m2 IPP building, a 2.6m fence, lighting masts and lightning protection masts about 18m high, with lattice support structures of 37.5m. Screening that hides a 3.4m panel cannot be assumed to hide these. There is no dedicated residential visual assessment, no ZTV analysis from the nearest homes, and no winter or year-one views. The LVIA relies on planting that it accepts needs three years to establish. A permanent industrial installation will be out of character in this rural landscape and visible from many locations.

Emergency Risk and Fire
Section 4.3 of the Planning and Environmental Report (page 57) lists two transformers and a diesel generator and tank. The site notice describes the transformers as oil-filled and bunded. Section 3.7.8 and Table 4.1 of the Screening Report rate major accident risk as low, yet neither assesses a fire at the transformers or diesel tank, and Appendix H does not either. Schedule 7 of the 2001 Regulations requires consideration of the risk of major accidents. The oil volume is not stated. Drawing 300101185-DR-200 notes "Bunds to be fitted with TBC at Detailed Design" and does not show that bunds would hold firefighting water instead of passing it through the separator to a soakaway. There is also no fire appliance swept path, gate width or turning assessment on the route from Site Access No. 1. Fire at oil-filled plant beside homes and drinking water sources must be addressed now, not left to detailed design.

Residential Amenity
Rural living is very important to my family. A permanent industrial installation and years of construction nearby would change the way we live.

Conclusion

For these reasons I respectfully ask the Commission to refuse permission. At a minimum, I ask it to seek further information on alternatives, a site-specific noise and vibration assessment, residential visual assessment, drainage and groundwater protection, and fire and emergency access.

Is mise,

Emmet Parker