OBSERVATION

Proposed 220 kV AIS Substation and Loop-In Grid Connection

Planning reference: VA04.324632

Fiona O Hare
Cairdeas,
Knocknagappagh,
Inch, Killeagh,
Co. Cork

Dear Sirs,

I wish to make an observation to the proposed 220 kV air-insulated switchgear (AIS) substation and loop-in grid connection associated with the Greenhills project, identified in the information available to the observer as VA04.324632, in the townlands of Ballyneague, Ballydaniel and Knocknagappagh, County Cork. Verify the exact development description, applicant, site boundary and procedure against the official application file.

I ask the decision maker to be fully satisfied that they have received complete and reliable information, that the proposal complies with applicable planning and environmental law and that risks to my well water, protected habitats and species, flood management and pollution prevention have been properly assessed and can be adequately controlled. Material information essential to a statutory assessment should not be replaced by assumptions or promises of later mitigation.

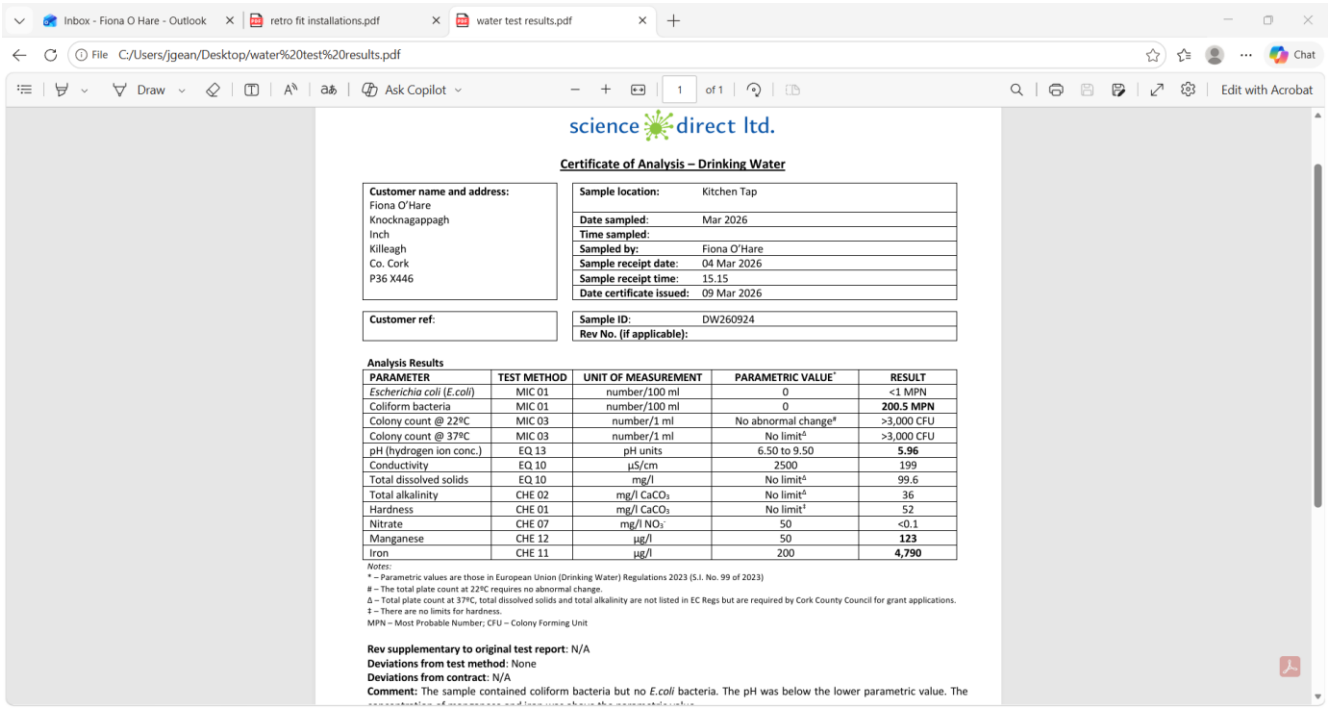
1: Private well, groundwater and aquifer vulnerability

I rely on a private domestic well. My water quality was so bad that I had to get an extensive water treatment system this year to bring the water up to European standards and was given the available grant from Cork County Council. Potential construction or operational pollution affecting groundwater is therefore a material concern. Excavation, construction compounds, fuels, lubricants, transformer insulating oil and other substances require effective containment and spill response. This is a prospective concern for me. I have added a screen shot of the water test that led me to getting the water treatment system.

The decision maker should establish the groundwater body, aquifer classification and vulnerability at the site and along plausible contaminant pathways; identify nearby wells and groundwater-dependent features; and assess construction and operational risks using site-specific hydrogeological evidence. The assessment should explain baseline conditions, monitoring locations and frequency, trigger levels, incident notification, remedial measures

and long-term responsibility. Generic construction-management wording is not a substitute for a site-specific assessment where a private water supply may be exposed.

Relevant framework includes Directive 2000/60/EC (Water Framework Directive), Directive 2006/118/EC on groundwater protection, the European Communities Environmental Objectives (Groundwater) Regulations 2010 (S.I. No. 9/2010), as amended, and the European Communities Environmental Objectives (Surface Waters) Regulations 2009 (S.I. No. 272/2009), as amended.



science direct ltd.

Certificate of Analysis – Drinking Water

Customer name and address: Fiona O'Hare, Knocknagappagh, Inch, Killeagh, Co. Cork, P36 X446	**Sample location:** Kitchen Tap
	Date sampled: Mar 2026
	Time sampled:
	Sampled by: Fiona O'Hare
	Sample receipt date: 04 Mar 2026
	Sample receipt time: 15.15
	Date certificate issued: 09 Mar 2026
Customer ref:	**Sample ID:** DW260924
	Rev No. (if applicable):

Analysis Results

PARAMETER	TEST METHOD	UNIT OF MEASUREMENT	PARAMETRIC VALUE*	RESULT
Escherichia coli (*E.coli*)	MIC 01	number/100 ml	0	<1 MPN
Coliform bacteria	MIC 01	number/100 ml	0	**200.5 MPN**
Colony count @ 22ºC	MIC 03	number/1 ml	No abnormal change#	>3,000 CFU
Colony count @ 37ºC	MIC 03	number/1 ml	No limitΔ	>3,000 CFU
pH (hydrogen ion conc.)	EQ 13	pH units	6.50 to 9.50	**5.96**
Conductivity	EQ 10	µS/cm	2500	199
Total dissolved solids	EQ 10	mg/l	No limitΔ	99.6
Total alkalinity	CHE 02	mg/l $CaCO_3$	No limitΔ	36
Hardness	CHE 01	mg/l $CaCO_3$	No limit‡	52
Nitrate	CHE 07	mg/l NO_3	50	<0.1
Manganese	CHE 12	µg/l	50	**123**
Iron	CHE 11	µg/l	200	**4,790**

Notes:
* – Parametric values are those in European Union (Drinking Water) Regulations 2023 (S.I. No. 99 of 2023)
# – The total plate count at 22ºC requires no abnormal change.
Δ – Total plate count at 37ºC, total dissolved solids and total alkalinity are not listed in EC Regs but are required by Cork County Council for grant applications.
‡ – There are no limits for hardness.
MPN – Most Probable Number; CFU – Colony Forming Unit

Rev supplementary to original test report: N/A
Deviations from test method: None
Deviations from contract: N/A
Comment: The sample contained coliform bacteria but no *E.coli* bacteria. The pH was below the lower parametric value. The

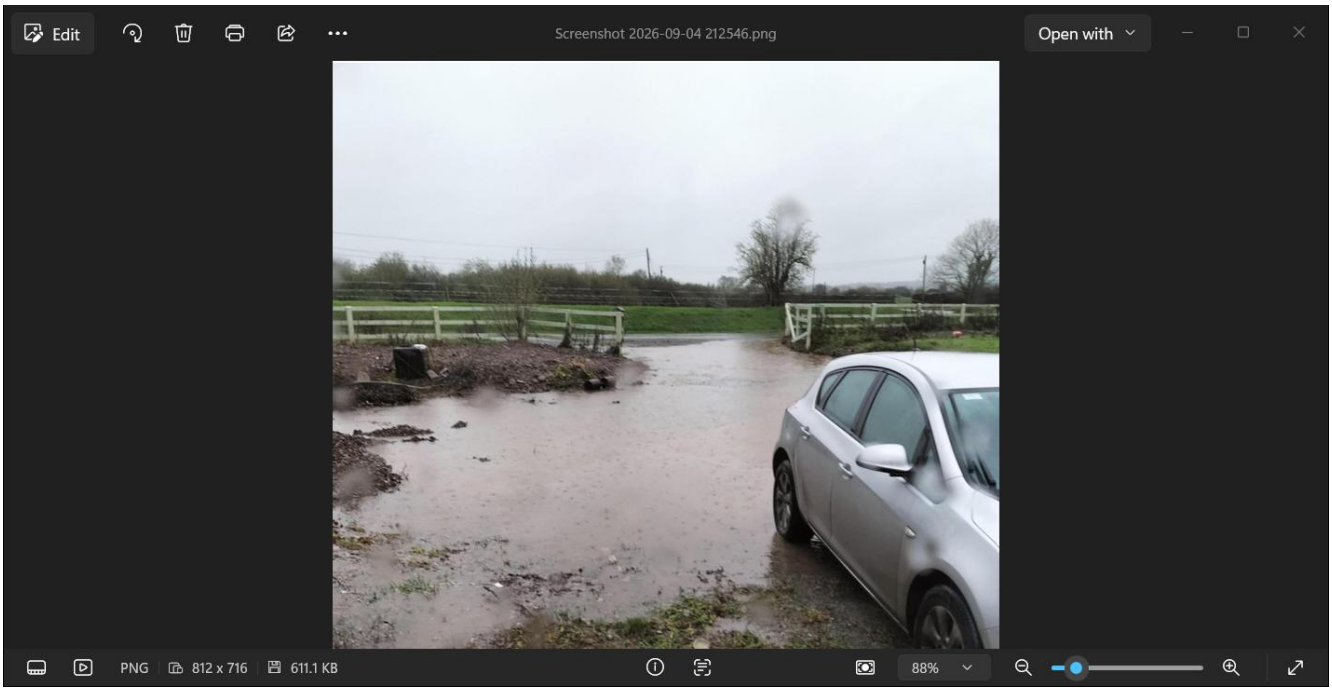
2: Surface water, water courses and flood risk

I am concerned about runoff, sediment, accidental spills, altered drainage and flood pathways during construction and operation. My home and surrounding homes flood whenever we have heavy rain or rain for long period of time. The photographs below are of my home when it rains. The lands are marshes and have little drainage. The decision maker should verify the receiving watercourses, drainage routes, catchment and flood mapping, and the relationship between the site and downstream sensitive waters. The assessment should address extreme rainfall, exceedance routes, temporary works, construction sediment control, drainage maintenance, and safe management of contaminated firewater or spill-response water where relevant.

The application should demonstrate, with site-specific hydrological and drainage evidence, that the development would not cause unacceptable flood risk on site or elsewhere, transfer risk to neighbouring land, or undermine water quality. General assurances that standard controls will be used are not enough without clear plans and calculations.



The back of my house



The front of my house



This is right across the road from my house, that also floods. The water is about 4 feet high in this photo.

3: Transformer oil, firewater and pollution prevention

Transformers and associated electrical equipment may contain insulating oil. The application should identify the maximum oil inventory for each relevant item and provide calculations showing that bunds and containment have adequate capacity, taking account of rainfall where applicable, freeboard, drainage and credible spill or fire scenarios. It should explain how oil, contaminated runoff and firewater would be retained and safely removed, how bund integrity would be inspected, and how alarms, isolation and emergency response would operate.

Pollution-prevention measures should be technically specified, deliverable, maintained throughout the development’s life and enforceable by condition. A general reference to bunding is not enough without design details and a demonstration of performance.

4: Otter, bats and other wildlife evidence

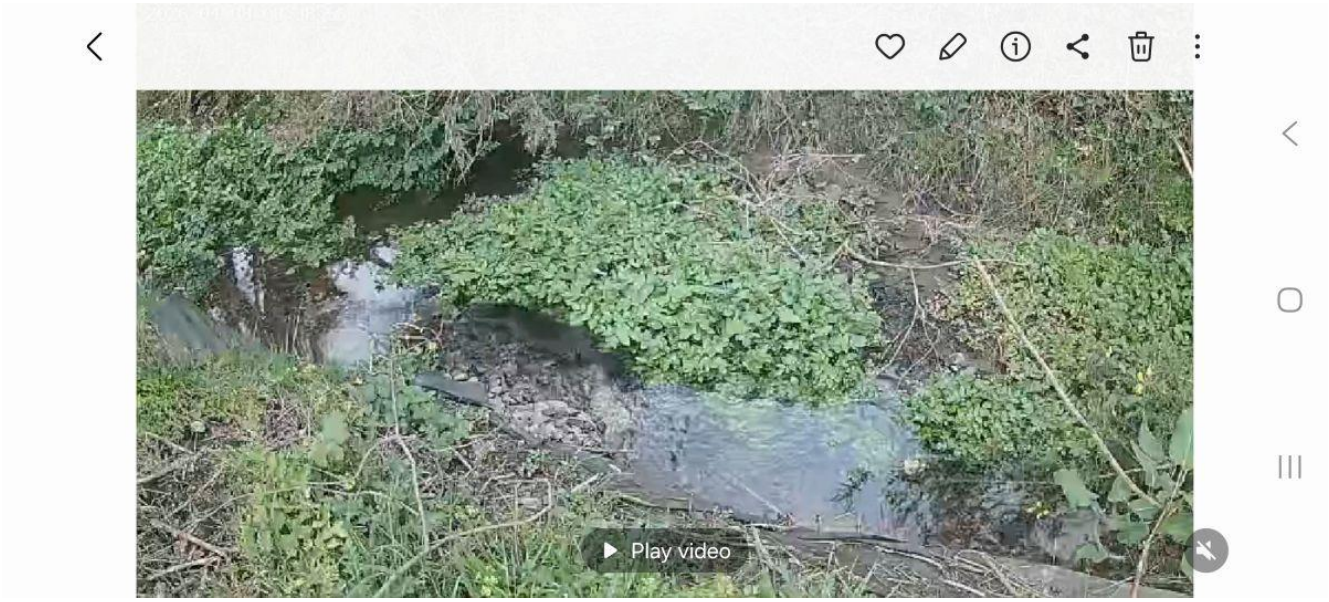
I have video evidence and still images showing an otter in a watercourse/habitat in the vicinity of the proposed development. The original recording is retained by me as I cannot download them here. Still images are for this observation; the original recording can be made available if requested and if the submission procedure permits.

Otter is listed in Annex IV(a) of Council Directive 92/43/EEC (Habitats Directive) and is subject to strict protection implemented in Irish law, including Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended. The authority should ensure that species surveys and mitigation are adequate for the site and likely zone of influence, including watercourses, banks, commuting routes, resting places and construction disturbance. Lighting, noise, vegetation clearance, water quality and habitat connectivity should be considered.

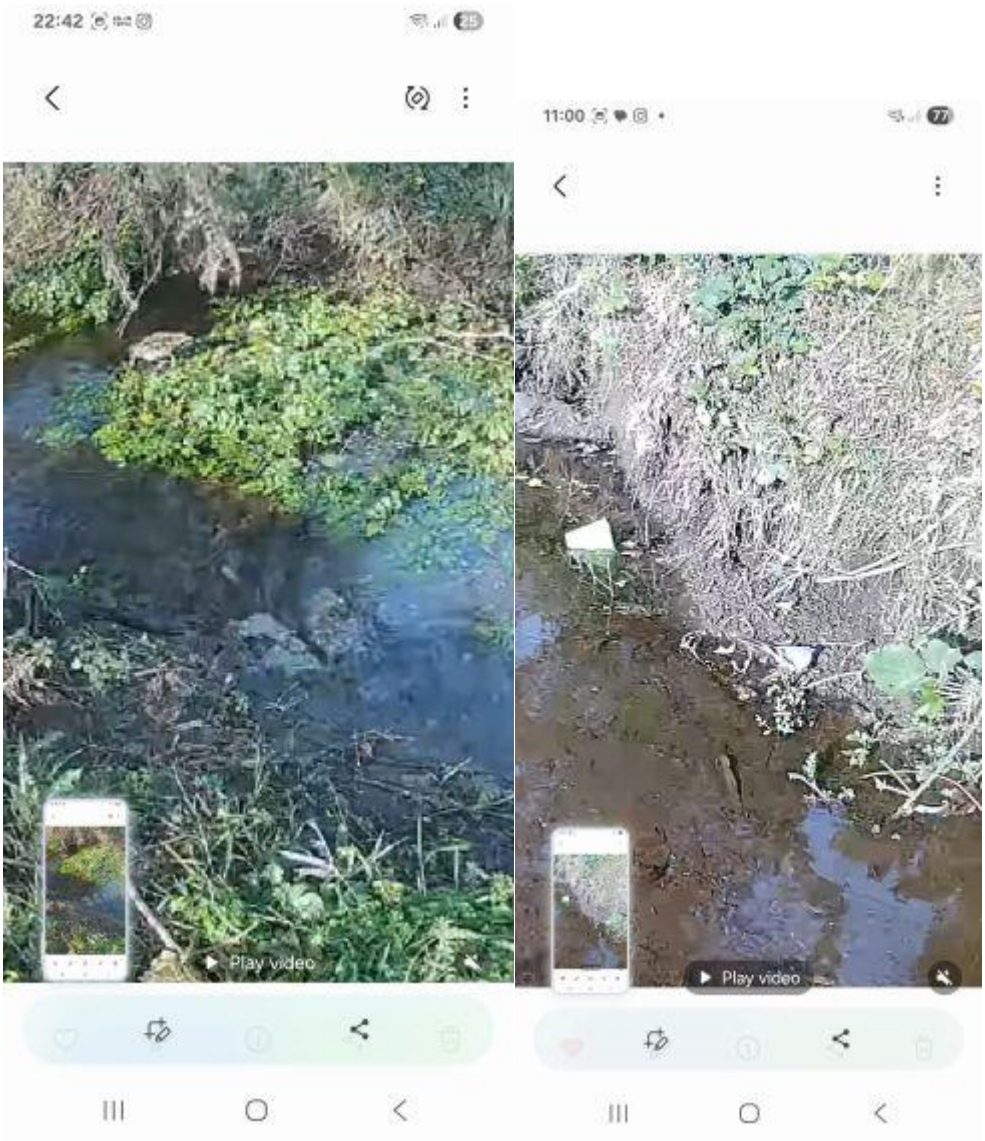
If the proposal alone or in combination with other plans or projects is likely to have a significant effect on a European site, screening and, where required, Appropriate Assessment must be undertaken under Article 6(3) of the Habitats Directive and Regulation 42 of the 2011 Regulations. The Blackwater River (Cork/Waterford) SAC (site code 002170) has been identified in the information available to me. The authority should verify hydrological connectivity, qualifying interests, conservation objectives and any credible pathway for effects. This observation does not assume significant effects merely because the SAC is named; it requests an evidence-based assessment.

I have also video evidence to bat activity, red listed pair of snipe and Grey Wagtail birds that live and bread in the vicinity of this development. Bats are protected under the Habitats Directive and Irish implementing law; wild birds are protected under Directive 2009/147/EC (Birds Directive) and the Wildlife Act 1976, as amended. Appropriate surveys should consider species, habitats, seasonal constraints and construction effects.

Still image of an Otter from my videos



Red Listed: Still images of Snipe and Grey Wagtail from my videos



Still image of a bat- albeit poor quality but I have the video of them



5: Environmental Impact Assessment and cumulative effects

The decision maker should confirm the applicable Environmental Impact Assessment (EIA) requirements and ensure that the information covers the full development, including associated grid-connection works, access, drainage, compounds and integral components. Relevant effects include biodiversity, land and soil, water, climate, population and human health, material assets, landscape and interactions between these factors.

Cumulative and in-combination effects with the associated Greenhills solar development and other relevant permitted, proposed or existing projects should be considered where legally required. The substation and solar development should not be treated as unrelated if they are functionally or environmentally connected; the precise relationship and assessment obligations must be established from the application record. Relevant framework includes Directive 2011/92/EU, as amended by Directive 2014/52/EU, and the applicable Irish implementing provisions.

6: Adequate information, monitoring and enforceable conditions

Before granting permission, the authority should ensure that the file contains sufficient information to evaluate the material risks identified above. Any conditions should be specific, measurable, enforceable and supported by approved documents, identifying responsibility for implementation, inspection, incident reporting, monitoring and corrective action. Information essential to a lawful statutory environmental assessment should not be deferred if doing so would undermine assessment before consent.

7: Consultation:

To date I have received no consultation in relation to this substation or anything involving this company. I did receive a leaflet that was being put into my post box, this was when the company belonged to Orsted, but I took it from the man delivering the leaflet. He said he didn’t work for the company. He was doing a friend a favor by delivering the leaflets. I did email Orsted asking for a community meeting, but it was refused.

8: Principal legal framework

- Council Directive 92/43/EEC (Habitats Directive), including Articles 6(3) and 12 and Annex IV(a), as relevant.
- European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477/2011), as amended, including Regulations 42 and 51 where applicable.
- Directive 2000/60/EC (Water Framework Directive).
- Directive 2006/118/EC on the protection of groundwater against pollution and deterioration.
- European Communities Environmental Objectives (Groundwater) Regulations 2010 (S.I. No. 9/2010), as amended.

- European Communities Environmental Objectives (Surface Waters) Regulations 2009 (S.I. No. 272/2009), as amended.
- Directive 2011/92/EU on environmental impact assessment, as amended by Directive 2014/52/EU, and the applicable Irish implementing legislation.
- Directive 2009/147/EC (Birds Directive) and the Wildlife Act 1976, as amended, insofar as protected wild birds may be affected.
- The planning legislation, development-plan provisions and Strategic Infrastructure Development procedure that apply to this specific application; these must be confirmed against the official file and current commencement provisions.

These are the principal legal instruments potentially relevant to the issues raised. I beg you to apply the provisions in force and applicable to this application, and to explain how the relevant statutory tests are met.

9: Conclusion

For the reasons above, I ask you to consider my observations unless it can be satisfied on adequate, site- specific evidence that the development has been properly assessed and comply with applicable planning, water, biodiversity and environmental assessment requirements. In particular, the risks to private groundwater supplies, surface water, flood pathways, pollution containment and especially protected wildlife must be resolved before consent is granted. Permission should not be based on assumptions or mitigation that have not been adequately demonstrated.

Yours Sincerely

Fiona O Hare