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Killeagh
Co. Cork
P36 EC66

19th October 2026

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

**Re: SUBMISSION / OBSERVATION — Strategic Infrastructure Development**

An Coimisiún Pleanála Case Reference 324632 (VA04.324632)
Proposed 220kV Air Insulated Substation (AIS) and Loop-in Grid Connection at Greenhills Solar Farm, townlands of Ballyneague, Ballydaniel and Knocknagappagh, Co. Cork
Applicant: Perigus Energy Ireland Midco Limited
Application under section 182A of the Planning and Development Act 2000 (as amended)

Dear Sir/Madam,

I wish to make a submission/observation on the above strategic infrastructure application. I am a resident in the nearby area, at the address above, and I work from home in the locality. I enclose the prescribed fee of €50. My observation addresses the three matters on which submissions may be made: the implications for the proper planning and sustainable development of the area; the likely effects on the environment; and the likely significant effects on a European site.

I note at the outset that this substation and grid connection is an integral and inseparable part of the wider Greenhills Renewable Energy Development, the solar farm and Battery Energy Storage System (BESS) element of which is the subject of a separate planning application to Cork County Council (Reg. Ref. 26/2133), to which I have also objected. I respectfully submit that the two applications must be considered together, and that this application should be refused — or, at minimum, subjected to the fullest environmental assessment and Appropriate Assessment — for the reasons set out below.

## 1. PROPER PLANNING AND SUSTAINABLE DEVELOPMENT OF THE AREA

1.1 Cumulative impact and project splitting. The proposed 220kV substation exists only to serve the Greenhills solar farm and BESS; it is not a free-standing development. Assessing it separately from the solar farm and BESS risks significantly understating the true scale and impact of what is, in reality, a single integrated industrial development extending across multiple townlands. I request that An Coimisiún Pleanála assess the cumulative and in-combination effects of the substation together with the associated solar farm and battery storage, and that it not consider the substation's impacts in isolation.

1.2 Landscape and visual amenity. A 220kV air-insulated substation is a substantial industrial installation — comprising switchgear, steel gantries, control buildings, security fencing, lighting and associated structures — introduced into an otherwise rural, agricultural landscape

approximately 7km from Youghal and 6.5km from Killeagh. I object on the grounds of visual intrusion and the erosion of the rural character of the area, and I request that the proposal be assessed against the landscape character objectives and relevant policies of the Cork County Development Plan 2022–2028.

1.3 Noise and residential amenity. A substation of this voltage generates continuous operational noise, including low-frequency transformer hum, which can be audible at nearby dwellings and is a recognised source of nuisance in rural settings where background noise levels are low. As a person who works from home, I would be exposed to such noise throughout the working day. I request that the application be assessed against a detailed operational noise assessment establishing agreed limits at the nearest noise-sensitive receptors.

1.4 Electromagnetic fields. While I understand that electromagnetic field exposure is regulated separately from the planning process, I request — for the reassurance of the local community — that the applicant confirm that field levels at the site boundary and at the nearest dwellings will comply with the applicable ICNIRP reference levels.

**2. LIKELY EFFECTS ON THE ENVIRONMENT**

2.1 Absence of an Environmental Impact Assessment Report. I note that this application is not accompanied by an EIAR. Given that the substation is an integral component of a very large renewable energy development — the associated solar farm extends to approximately 323 hectares, together with a Battery Energy Storage System — I am concerned that assessing the substation in isolation, without an EIAR, understates its true environmental significance. I request that An Coimisiún Pleanála rigorously scrutinise the adequacy of environmental impact screening, taking full account of the cumulative effects of the substation together with the associated solar farm and battery storage, and that it require an EIAR if there is any doubt that the development as a whole is likely to have significant effects on the environment.

2.2 Water quality and the Tourig River. The works involved — excavation, cabling, foundations and construction traffic — give rise to a risk of sediment and pollutant runoff to local watercourses. It is my understanding that the Tourig River, within this catchment, contributes to the drinking water supply for Youghal, which makes any contamination risk a matter of public health significance extending beyond the immediate locality. I request that robust construction-phase pollution control and a site-specific surface water management plan be required, and that the effects on local water quality, over both construction and operation, be fully assessed.

2.3 Soils, hydrology and construction. I request that the effects of ground works, excavation and any dewatering on local hydrology and on private water sources be assessed, together with appropriate mitigation and monitoring.

**3. LIKELY SIGNIFICANT EFFECTS ON A EUROPEAN SITE**

3.1 I note that the application is accompanied by a Natura Impact Statement (NIS). The submission of an NIS reflects that the applicant itself recognises the potential for significant effects on one or more European (Natura 2000) sites, and that a Stage 2 Appropriate Assessment is accordingly required.

3.2 The application site drains toward watercourses connected to the wider Blackwater catchment and the Youghal Bay / Ballymacoda area, which contain European-designated sites, including the Blackwater River (Cork/Waterford) SAC and the Blackwater Estuary SPA, and potentially the Ballymacoda (Clonpriest and Pillmore) SAC and Ballymacoda Bay SPA. I request that the Commission assess effects on the European site or sites identified in the applicant's Natura Impact Statement. Construction runoff, excavation, dewatering and other pollution pathways could affect the qualifying interests of these sites — which in the Blackwater catchment characteristically include migratory fish species and otter — whether directly or in combination with the associated solar farm and battery storage.

3.3 I respectfully request that An Coimisiún Pleanála carry out a rigorous Appropriate Assessment, scrutinise the adequacy and completeness of the NIS, and fully assess in-combination effects with the associated solar and battery development. In accordance with the precautionary principle under Article 6(3) of the Habitats Directive, where it cannot be established beyond reasonable scientific doubt that the development will not adversely affect the integrity of a European site, approval must be refused.

**CONCLUSION**

For the reasons set out above, I respectfully request that An Coimisiún Pleanála refuse approval for this development; or, at minimum, that it assess the substation together with the associated solar farm and battery storage as a single development, require an Environmental Impact Assessment Report, and carry out a full and rigorous Appropriate Assessment before any decision is made.

I confirm my name and address as set out above, and I enclose the prescribed €50 fee. I request that I be notified of the Commission's decision in due course, and I reserve the right to make further submissions.

Mise le Meas,

Fiona Ryan