Ian and Simona Damerell
Ballydaniel
Lackaroe
Youghal
P36F293

02 November 2026

The Secretary
An Coimisiún Pleanála
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,

We wish to formally object to the above proposed development on rural farmland in Ballyneague, Ballydaniel and Knocknagappagh, County Cork.

We have serious concerns regarding the suitability of the proposed location and the potential long-term environmental consequences of this development. In particular, we believe insufficient consideration has been given to the area's natural hydrology, the risk of water pollution, the adequacy of environmental legislation and safeguards, and the cumulative impact of multiple large-scale energy infrastructure developments in the surrounding area.

Our grounds for objection are outlined below.

1. HYDROLOGY, NATURAL DRAINAGE AND FLOODING

The proposed substation is to be constructed on land locally known as *Cronins Bogs*, an area traditionally recognised as naturally wet and boggy ground.

This is a significant concern, as wetlands and boggy ground play an important role in the natural management of surface water. They act as natural water storage areas, helping to regulate water flow, absorb rainfall and reduce the risk of flooding in surrounding areas.

The construction of a substantial electrical substation will inevitably involve excavation, ground preparation, foundations, access roads, hardstanding areas and drainage

infrastructure. These works have the potential to significantly alter the natural drainage patterns and reduce the land's ability to absorb and retain water.

We are concerned that disturbing this naturally wet ground could result in increased surface water runoff and potentially transfer flooding problems to neighbouring agricultural land, properties and downstream watercourses.

Has sufficient proper consideration (not the desk-top fleeting type) been given to the historical characteristics of this land (such as the effects of Storm Babet three years ago), seasonal groundwater levels and the potential impact of extreme rainfall events?

We believe a comprehensive and independently verified hydrological and flood risk assessment is essential before any decision is made to permit this development.

2. RISK OF WATER POLLUTION AND PROTECTION OF DRINKING WATER

There are multiple natural springs running through this stretch of land which feed into the River Tourig. This river system is of particular importance due to its connection to the wider water network serving the Youghal drinking water supply.

The potential contamination of these springs and connected watercourses is one of our greatest concerns.

Construction activities involving excavation, concrete pouring, soil disturbance, machinery, fuel storage and the installation of electrical infrastructure all carry a risk of pollution. Furthermore, the proposed substation will contain large oil-filled electrical transformers, creating an additional potential source of contamination in the event of an oil leak, equipment failure or accidental spillage.

Given the presence of natural springs and their connection to the River Tourig, any pollutants entering the groundwater or surface water system could potentially travel beyond the immediate development site.

The consequences of contamination could extend well beyond the boundaries of the proposed development and could threaten aquatic habitats, agricultural water supplies and ultimately drinking water resources.

We are particularly concerned that insufficient consideration has been given to the protection of these natural springs and their associated watercourses as well as the quality of our drinking water – as we and most of our neighbours get our drinking water from wells.

We request that the Commission ensure a comprehensive hydrogeological investigation is undertaken, identifying all natural springs, groundwater pathways and watercourses in the area, together with a detailed assessment of the potential risks to the River Tourig and the wider drinking water supply.

The protection of drinking water must take precedence over the convenience of locating major electrical infrastructure on environmentally sensitive land.

3. LACK OF ADEQUATE LEGISLATION AND REGULATORY SAFEGUARDS

We have concerns regarding the adequacy of the current legislative and regulatory framework in protecting local environments from the potential consequences of large-scale electrical infrastructure and associated battery energy storage developments.

While planning and environmental legislation exists, we believe there are significant questions regarding whether existing controls provide sufficient protection against the long-term environmental risks associated with these developments.

In particular, there must be clear and enforceable requirements governing:

- The protection of groundwater, natural springs and local watercourses.
- The prevention and management of transformer oil leaks and other hazardous substances.
- The long-term monitoring of water quality.
- Emergency procedures in the event of pollution or infrastructure failure.
- The cumulative environmental effects of multiple substations and battery energy storage facilities in close proximity.

There must be demonstrable evidence that the proposed development can be constructed and operated without placing local water resources and the wider environment at unacceptable risk.

We believe the Commission should apply the precautionary principle where there is uncertainty about the potential environmental consequences. The absence of proven environmental damage should not be interpreted as proof that the development presents no risk.

4. CUMULATIVE ENVIRONMENTAL IMPACT OF NEARBY DEVELOPMENTS

A further major concern is the cumulative impact of the increasing concentration of large-scale energy infrastructure in this rural area.

The proposed development cannot reasonably be considered in isolation.

The Lyrenacarriga Wind Farm substation is located approximately 4 kilometres away. In addition, there are two further substations and associated Battery Energy Storage System (BESS) developments in relatively close proximity.

The combined environmental impact of these developments raises serious questions regarding the overall suitability of this area for such a concentration of industrial-scale electrical infrastructure.

Each individual development may present risks that appear manageable when considered separately. However, when multiple developments are introduced into the same geographical area, their combined effects on groundwater, surface water drainage, local ecosystems, the rural landscape and surrounding communities may be considerably greater.

Of particular concern is the possibility that multiple developments could affect the same interconnected water systems and drainage catchments.

We are not satisfied that the combined effects of these developments have been adequately assessed or that sufficient consideration has been given to their cumulative environmental impact.

We request that the Commission require a comprehensive cumulative impact assessment which considers all existing, approved, proposed and reasonably foreseeable energy developments in the surrounding area, including their associated substations, battery storage facilities, access roads and drainage infrastructure.

It would be inappropriate to assess each development in isolation where their combined environmental effects could have a much greater impact on the area.

5. PROTECTION OF THE RURAL ENVIRONMENT AND THE PRECAUTIONARY PRINCIPLE

While we recognise the importance of renewable energy and the need to develop sustainable sources of electricity, this should not be achieved at the expense of sensitive local environments, natural water resources and established rural communities.

Renewable energy developments must be appropriately located and must demonstrate that they will not cause unacceptable environmental harm.

The presence of naturally wet land, multiple springs, interconnected watercourses and other large-scale energy infrastructure in the immediate vicinity should warrant particularly careful scrutiny of this proposal.

Once natural drainage systems and groundwater pathways have been disturbed, the consequences may be difficult or impossible to reverse.

The Commission must therefore be satisfied, on the basis of robust and independently verified evidence, that the proposed development will not result in long-term damage to the local environment.

CONCLUSION

For the reasons outlined above, I believe there are significant unresolved environmental concerns surrounding the proposed 220kV substation at Ballyneague.

Our principal concerns relate to:

- The suitability of constructing a substantial electrical substation on naturally wet land locally known as Cronins Bogs.
- The potential impact on natural springs and the risk of contamination entering the River Tourig and the wider Youghal drinking water supply.
- The adequacy of existing environmental legislation and regulatory safeguards.

- The failure to adequately consider the cumulative impact of multiple substations and battery energy storage facilities in the surrounding area.

We respectfully request that An Coimisiún Pleanála give these concerns serious consideration and require comprehensive, independent environmental, hydrological and cumulative impact assessments before reaching any decision.

In the absence of clear and convincing evidence that the proposed development can proceed without unacceptable risks to local water resources, the environment and the surrounding community, **we strongly urge the Commission to refuse permission for this development.**

The protection of our natural environment, our water resources and the rural character of this area must remain a priority for future generations.

Is mise,

Ian Damerell and



Simona Damerell