Jennifer McGowen
Knocknagappagh
Inch
Killeagh
Co. Cork

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 50 to 200 metres of the proposed development and make this Observation as a directly affected resident. I do not object to renewable energy infrastructure in principle. This Observation concerns only the substation application. The substation is permanent. Section 6.3 of Appendix H states that it will be handed to the network operator and will not be decommissioned. It must therefore be assessed as a permanent feature, whatever happens to any solar farm.

I. HYDROLOGY AND FLOODING

The village of Inch was severely affected by Storm Babet in 2023. Roads and the church were closed, people were displaced from their homes, and road surface damage caused damage to my own car. With that experience, I am concerned that further hardstanding and earthworks in this catchment could worsen flooding downstream.

Appendix N records a substation footprint of approximately 1.8 hectares. It describes the effect on the land as "moderate, adverse and permanent" and records excavation of up to approximately 3.6 metres. It gives a combined cut and fill volume for the substation and BESS of approximately 25,013 cubic metres. It acknowledges that the adjoining Tourig_020 and Glendine_010 watercourses have mapped flood zones, and that local knowledge indicates flooding within the same sub-basin. Its Flood Risk Assessment calculates that a 1-in-100-year event would increase runoff by approximately 0.016 to 0.185 cubic metres per second, up to about 4.15 per cent of the relevant micro-catchment. It accepts that, without mitigation, construction runoff could cause flooding on site or downstream.

The fact that the platform lies outside a mapped flood zone does not mean there is no flood risk elsewhere in the system. I respectfully ask the Commission to require site-specific evidence, based on winter and saturated conditions, that downstream flows towards Inch will not be worsened. That evidence should include the cumulative effect of other consented development nearby.

II. EMERGENCY RISK AND FIRE

The substation will include up to two transformers, which the site notice describes as oil-filled within bunded enclosures, together with a diesel generator and fuel tank (Planning and Environmental Report, section 4.3). The EIA Screening Report, at section 3.7.8 and Table 4.1, rates the risk of major accidents as low. It does not assess a fire at the transformers or the diesel tank. Schedule 7 of the Planning and Development Regulations 2001, as amended, requires consideration of the risk of major accidents and disasters relevant to the project.

Drawing 300101185-DR-200 states that bunds are "TBC at Detailed Design". The oil volume is not stated, and nothing shows that firefighting water would be retained in a bund rather than passing to the surface-water system and soakaways. The site lies close to woodland, which increases the consequence of any fire.

Access is equally unresolved. Drawing 300101185-DR-100B shows the new entrance, Site Access No. 1 on the R634, but there is no fire appliance swept path, gate width or turning assessment for the route to the transformer bays. Appendix M relates to the Greenhills Energy Park and is not an assessment of this route. The surrounding roads are extremely narrow, and the available water sources are also reached by narrow roads. No emergency plan has been presented to show how residents would be evacuated safely. Residents are also concerned that a fire could affect household insurance costs. These matters should be demonstrated before a decision is made and not deferred to detailed design.

III. WATER POLLUTION

My household relies on a private well. The CEMP identifies the site as largely underlain by the Glenville Groundwater Body, a locally important aquifer. It classes most of the site as high groundwater vulnerability, and extreme in places to the south. The site drains through the Tourig and on to the River Blackwater, which is a European site.

The substation drainage includes a soakaway (5m x 5m x 1.8m) within the compound. The CEMP states that oil and fuel will be managed through a SuDS train with an interceptor and soakaway. That creates a direct pathway to groundwater if a transformer, bund or tank fails. The CEMP schedule of mitigation (Appendix C, section 11.5.4.4) itself accepts a residual risk of accidental spillages and leaks. The extensive construction controls described, including silt fences, settlement tanks, turbidity monitoring and bunded fuel storage, show that the pollution risk is real.

I ask the Commission to require clarity on what water may reach the soakaway and how it is treated first. I also ask that private wells near the site be protected through baseline testing and monitoring. The Commission must be satisfied beyond reasonable scientific doubt, under Article 6(3) of the Habitats Directive, that the Blackwater SAC will not be adversely affected.

IV. SITE LOCATION AND CUMULATIVE IMPACT

Schedule 6 of the Planning and Development Regulations 2001, as amended, requires a description of reasonable alternatives studied and a comparison of their environmental effects. I could not find a comparison of alternative sites along the 220kV route, and the selection appears to rest mainly on landowner availability. I could also find no letter of support from EirGrid for this particular location.

The height of the structures means the visual impact cannot be effectively screened. The site is accessed from the R634, which is a scenic route, and it lies a short distance from the Blackwater. Planning permission has also been granted for 17 wind turbines and another 220kV substation approximately 1km from this site. The cumulative landscape, noise and traffic effects of these developments together should be assessed. The local roads are unsuitable for heavy vehicles and for emergency vehicles, particularly in wet conditions.

V. LACK OF REGULATION

I am not aware of specific national guidelines governing the siting and safety of substations of this type. That makes rigorous scrutiny under the EIA Directive (2011/92/EU as amended by 2014/52/EU) all the more important. I respectfully ask the Commission not to rely solely on the applicant's own assessments. It should test them independently on flood risk, major accident risk, alternatives and cumulative effects. Where the information needed is "to be confirmed", the Commission cannot reasonably conclude that significant effects have been excluded.

VI. CONCLUSION

For these reasons, I respectfully request that the Commission refuse permission. At a minimum, I ask the Commission to request further information on the following:
- A site-specific flood and drainage assessment, including downstream effects on Inch
- Oil volumes, bund capacity, firefighting water retention and a fire risk assessment
- Fire appliance swept path and gate details for the route from Site Access No. 1
- A resident emergency and evacuation plan
- Groundwater protection measures, including for private wells
- A comparison of reasonable alternative sites
- A cumulative assessment with nearby consented development

Thank you for taking the time to review my objection,

Is mise,

Jennifer McGowen