Mary Hickey Griffin (on behalf of the Griffin Family)
Rearour South
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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 am a resident living within 2 kilometres (and we own a family cottage within 1km at Ballydaniel, Lackaroe, Youghal) of the proposed development, and I make this Observation on the above application. It concerns only the 220kV substation and loop-in connection. I do not object to renewable energy in principle. However, the substation is to be permanent industrial infrasctucture in a rural location. It will remain, and be handed to the network operator, even if an associated solar farm is decommissioned (Appendix H, section 6.3). It must therefore be judged on its own merits as lasting industrial infrastructure.

Lack of Regulation

The Commission is the competent authority for the purposes of Directive 2011/92/EU as amended by Directive 2014/52/EU. That Directive requires a complete and independent assessment, including cumulative effects and the removal of reasonable scientific doubt before consent is given. I respectfully submit that the Commission should not rely uncritically on the applicant's own documents, which are necessarily prepared from the applicant's perspective.

Nationally, there is an acknowledged absence of specific guidelines for utility scale energy development, which leaves decision makers with limited guidance. Section 15(1) of the Climate Action and Low Carbon Development Act 2015 requires climate objectives to be pursued in so far as practicable. That is a qualified duty. It does not displace the need to weigh landscape, ecology, agricultural land, amenity, heritage and infrastructure constraints. I ask the Commission to explain clearly in its reasoning how

these matters have been balanced, rather than treating alignment with climate policy as decisive.

Cumulative Effect

In assessing Planning Ref. 25/6876, Cork County Council identified the need for a proper cumulative assessment of the approximately 800 acre solar farm and the permitted Lyrenacarriga Wind Farm. It asked that the landscape and visual assessment address this. The later submission under Planning Ref. 26/2133 did not, in my view, adequately respond to that request. It also does not appear to have properly taken this 220kV substation into account.

The substation cannot sensibly be viewed in isolation. A 110kV substation has already been permitted under PA04.309121, approximately 4 km away, and this application proposes a second, 220kV substation. Two substantial substations in one area raise cumulative landscape, visual and construction issues. Construction traffic for both is proposed to use the R634. Overlapping programmes could produce combined effects from heavy goods vehicles and abnormal loads, together with noise, dust, disturbance and road safety risk for residents and road users. The fact that separate applications have been made should not allow these effects to go unassessed. I ask the Commission to require assessment of the interaction between the solar farm, the wind farm, the permitted 110kV substation, this 220kV substation and the associated transmission infrastructure, both spatially and over time.

Emergency Risk and Fire

The substation will include up to two 220kV transformers, switchgear, and a diesel generator and fuel tank (Planning and Environmental Report, section 4.3). The site notice describes the transformers as oil-filled and bunded, yet section 4.3 does not use those words. 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. The EIA Screening Report addresses this at section 3.7.8, and Table 4.1 rates the risk as "Low". However, that section deals with concrete, hydrocarbon spills from construction plant and construction site accidents. It does not assess a fire at the transformers or the diesel tank, and Appendix H does not do so either.

Drawing 300101185-DR-200 shows a full retention separator and soakaways on the surface water system. It also notes that bunds are "to be fitted with TBC at Detailed Design". The oil volume is not stated on the site notice, in section 4.3 or on that drawing. Nothing shows that transformer oil and firefighting water would be retained within a bund rather than passing through the surface water system to a soakaway. Because the station is permanent, these matters should be demonstrated now and not deferred.

Emergency access is also unaddressed. The access sought runs from the compound to Site Access No. 1 on the R634 (drawing 300101185-DR-100B). As the station will outlast the solar farm, this is the route a fire appliance would have to use. Yet section 4.3, Appendix H and the drawings contain no fire appliance swept path, gate width or turning

assessment. Drawing 300101185-DR-210 is a gate and fence detail only, and Appendix M is the Greenhills Energy Park traffic assessment, not an assessment of this route.

Hydrology and Flooding

The applicant's Appendix N states that the 220kV substation footprint is approximately 1.8 hectares and that the effect on land occupied by the substation and access tracks will be "moderate, adverse and permanent". It records excavation depths of up to about 3.6 metres, a combined cut and fill volume for the substation and battery storage of about 25,013 cubic metres, and about 9,320 cubic metres of imported stone to cap the platform. These are significant interventions in the existing soil and drainage regime.

The site is not within a mapped flood zone. However, Appendix N acknowledges that the adjacent Tourig_020 and Glendine_010 watercourses have mapped indicative flooding in low and medium probability zones. It also records that local knowledge indicates flooding within the same river sub-basin (section 1.8.3). Local observations of seasonally wet ground add to this concern. The absence of a mapped flood zone beneath the platform is not the same as the absence of hydrological risk.

The Flood Risk Assessment calculates that a 1-in-100-year storm would increase runoff by approximately 0.016 to 0.185 cubic metres per second, up to about 4.15 per cent relative to the micro-catchment. Appendix N accepts that construction will increase runoff and that, without mitigation, this could cause flooding on site or downstream. It also accepts that poorly designed drainage could create preferential flow paths and erosion (section 1.9.1.1). Reliance on engineered mitigation is not enough. The applicant should show, with robust site-specific evidence, that flow paths, infiltration, storage and the timing and volume of downstream flows will not be materially worsened for neighbouring land and watercourses.

European Sites

The site lies adjacent to the Tourig River (the Tourig_020 watercourse identified in Appendix N), which is hydrologically connected to the Blackwater River (Cork/Waterford) Special Area of Conservation (Site Code 002170). The SAC is designated under Council Directive 92/43/EEC (the Habitats Directive) and protected in Irish law by Part XAB of the Planning and Development Act 2000, as amended, and the European Communities (Birds and Natural Habitats) Regulations 2011, as amended. Under Article 6(3) of the Habitats Directive, any project likely to have a significant effect on a European site, either alone or in combination with other plans or projects, must be subject to Appropriate Assessment. Consent may be given only where no reasonable scientific doubt remains that the project will not adversely affect the integrity of the site (Case C-127/02, Waddenzee).

The Qualifying Interests of the SAC include water-dependent species such as Atlantic Salmon (Salmo salar) and Freshwater Pearl Mussel (Margaritifera margaritifera), which are highly sensitive to sedimentation and changes in water quality. The applicant's own

documents identify pathways to the river: about 25,013 cubic metres of cut and fill, increased runoff that Appendix N accepts could cause flooding downstream without mitigation, the risk of preferential flow paths and erosion, and a surface water system discharging to soakaways that has not been shown to retain transformer oil or firefighting water. The Court of Justice has held that mitigation measures cannot be taken into account at the screening stage (Case C-323/17, People Over Wind). As the applicant relies on drainage and bunding that are not yet fully designed, I submit that significant effects on the SAC cannot be excluded at screening, and that permission cannot lawfully be granted without a full Appropriate Assessment, including the in-combination effects of the other projects described above.

Conclusion

For these reasons, I respectfully ask the Commission to refuse permission. At a minimum, I ask that it request further information on a full cumulative assessment, fire and major accident risk including oil volumes, bund capacity and firefighting water retention, emergency access, flood risk and drainage impacts downstream, and effects on the Blackwater River SAC.

Thank you for considering this Observation.

Is mise,

Mary Hickey Griffin