Mary Mason
Knockngappagh
Inch
Killeagh
Co. Cork

13th 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 between 300 metres from the proposed substation, and I make this observation on the application. It concerns only the 220kV substation, the loop-in and the access shown in red on drawing 300101185-DR-100B. The solar farm and battery storage are a separate application. The substation, however, is permanent. The site notice seeks permission for it to remain after the solar farm is decommissioned and to be handed to EirGrid. It must therefore be assessed on its own merits as a permanent installation.

Noise and Vibration

My concern is the continuous hum of a 220kV station operating day and night close to homes. The noise assessment on file, Appendix S, is titled for the Greenhills Renewable Energy Park and covers the solar farm, battery compound and substation together. Table 1.1 gives distances to the energy park red line, the closest being 5 m and 8 m. It does not give distances to the platform on drawing 300101185-DR-213, or from the compound or access to any house. The 23 to 45 dB range in Table 1.28 is not a calculation for this compound. Chapter 15 of the Planning and Environmental Report and section 3.7.6 of the EIA Screening Report rely on that appendix to conclude that operational noise is not significant, and there is no EIAR.

Construction is also unassessed. Section 5.5.6.1 puts the substation works at about 16 months. The BS 5228 test cited at section 1.2.5.1 of Appendix S (65 dB at a house for more than 40 days in six months) would therefore be met on duration if the level is reached. That level has not been calculated for this platform, the access or the haul route to Site Access No. 1. The fill figures are also inconsistent. Drawing 300101185-DR-213 gives a net fill of 17,345 m3 in its summary, a different figure in its notes, and a further 9,490 m3 of capping stone. Section 5.5.6.1 gives 25,013 m3 and says all excavated material will be reused. Imported fill, stone and 150 tonne transformer deliveries mean heavy traffic on the R634 and

the access. I ask that a noise assessment specific to this development be required, including transformer tonal noise assessed under BS 4142 at the nearest dwellings.

Lack of Public Consultation

I am not aware of any consultation specific to the substation, and consultation on the wider scheme was limited. Appendix A records that Newsletter 1 went to approximately 342 houses within 1.5 km, and that some later letters were returned undelivered by An Post. Not every household in that area received the newsletters. The August engagement at Inch Community Centre consisted largely of pre-booked individual appointments, and other residents who asked for one to one meetings were not facilitated. Newsletter 2 said the layout was still being drafted, and residents were told that photomontages would follow with the application. Consultation on a concept is not informed participation on the scheme actually lodged. Residents could not comment on the completed layout or technical documents, and the public was not given a collective forum in which the permanent substation could be discussed.

Archaeology

Appendix R assesses the wider renewable energy site. Its avoidance measures are solar measures: non-intrusive gabion or ballasted foundations and stand-off buffers around anomalies M1 to M4. A compound formed by cut and fill, with a cut of 17,304 m3 on drawing 300101185-DR-213, cannot sit on gabion baskets. Those measures do not apply here.

The geophysical survey under licence 26R0042 covered, in the report's words, a significant portion of the site, not all of it. The applicant does not state that the compound, the tower bases or the widened access lay within the surveyed area. The May 2025 walkover sees only the surface. Paragraphs 6.34 and 6.35 rely on monitoring during construction, with preservation in situ only "where feasible". On a platform already approved and cut to level, that will not be feasible, and the likely outcome is recording and then building. Appendix R itself quotes Cork County Council's comments of 10 February 2026 that sub-surface archaeology had to be assessed on the solar application. The permanent station should not be held to a lower standard.

The hillfort CO067-001001 in Rath townland lies 490 m west of the site boundary and is described as occupying a commanding position. I could find no specific assessment of the effect of a permanent compound, lightning masts and new towers on its setting. I ask that sub-surface testing of the compound, tower bases and access, and a proper setting assessment, be completed before any decision.

Emergency Risk and Fire

The station includes up to two oil-filled transformers and a diesel generator and tank, with woodland in the vicinity. Schedule 7 of the Planning and Development Regulations 2001, as amended, requires consideration of the risk of major accidents and disasters. Section 3.7.8 and Table 4.1 of the screening report rate that risk as low, but address concrete, construction spills and site accidents. They do not assess a fire at the transformers or the diesel tank. The oil volume is not stated. Drawing 300101185-DR-200 notes bunds as "TBC at Detailed Design", and shows a separator and soakaways without showing that firefighting water would be retained rather than passed to the soakaway.

The application also lacks a fire appliance swept path from Site Access No. 1 on the R634 to the transformer bays, a stated gate width and a turning assessment. Appendix M is a traffic assessment for the

energy park, not this route. The roads serving this area are narrow, and I can find no emergency plan to protect local residents. These matters should be demonstrated now and not deferred.

Water Pollution

My household relies on a private well, and I am concerned about contamination. The CEMP records that the platform works involve about 13,600 m3 of topsoil and 39,690 m3 of subsoil over 4.71 hectares (Appendix B). It describes a network of historic and unmapped drains leading to the River Tourig and the River Blackwater, a European site. The site sits largely over the Glenville Groundwater Body, mostly of high vulnerability and extreme in places to the south. Despite this, drainage relies on infiltration, including a 5m x 5m x 1.8m soakaway in the compound. The CEMP deals with oil and fuel through an interceptor and soakaway, and the Water Quality Monitoring Plan accepts a residual risk of accidental spillage. A transformer or bund failure therefore has a direct pathway to groundwater.

I ask that private wells near the site be identified and assessed, that a hydrogeological assessment be required before any infiltration of potentially contaminated water is permitted, and that the Commission consider the Habitats Directive Article 6(3) implications for the Blackwater.

Conclusion

The application relies on documents written for the whole energy park and does not assess this permanent station on its own terms. I respectfully ask the Commission to refuse permission. At a minimum, I ask it to request further information on the matters raised above before any decision is made.

Is mise,

Mary Mason