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13th October 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,

I wish to make an Observation in respect of the substation element of this application only. My home is located within 200 metres of the proposed development. I am not opposed to renewable energy infrastructure as a matter of principle. My concern is that the substation would be a permanent installation, and god knows what would be going in afterwards as its there for the rest of our lives and for the next generation, remaining on site even after the separate solar farm is decommissioned at the end of its 40-year life. For that reason, the suitability of this location and the impacts of the substation should be assessed in their own right.

a. Water Pollution

A number of watercourses drain the site, namely the Carignass, Knocknagappagh, Ballyneague, Ballygarvin and Youghal Park streams, together with the Tourig and Glendine rivers. All of these discharge to the River Blackwater, which is a European designated site, and ultimately to the Celtic Sea. In Section 2.4 (p.9) of its CEMP, the applicant itself acknowledges that the construction programme will need to manage risks to watercourses and protect run-off from spillages of fuel, sewage and lubricants.

The scale of the proposed earthworks is significant. According to the Spoil Management Plan at CEMP Appendix B (pp.3-4), roughly 13,600 cubic metres of topsoil and 39,690 cubic metres of subsoil would be recontoured across 4.71 hectares. Bare ground on this scale, exposed to rainfall, presents an obvious risk of silt and sediment entering local watercourses. CEMP Appendix F (Section 3.2, pp.10-12) refers to a wide network of historic drains and unmapped natural and artificial channels that drain towards the Tourig and from there to the Blackwater,

providing a direct route for pollutants to travel downstream. EPA designated drinking water rivers are also identified as sensitive receptors in Sections 3.1 and 3.5 (pp.10 and 15).

Most of the site sits above the Glenville Groundwater Body, which is classed as a locally very important aquifer. The CEMP rates groundwater vulnerability as High across most of the site and Extreme near the rivers and towards the south. Even so, the drainage design depends on infiltration and soakaways, including a 5m x 5m x 1.8m percolation area inside the compound (CEMP Sections 3.2.2, 3.3 and 3.4, pp.13-15). The two 33/220kV transformers will hold oil, and the CEMP proposes to manage oil and fuel by means of a SuDS train incorporating an interceptor and soakaway. Should a transformer or its bund fail, there would be a direct route to the water table. Appendix C (Section 11.5.4.4, p.7) admits that, even with mitigation in place, a risk remains of accidental spillages, leaks and overloading of surface water infrastructure.

The extent of the controls being proposed speaks for itself. These include silt fencing, settlement and treatment tanks, flocculation, 110% bunding, daily pH testing and continuous monitoring of run-off (Appendix C, Sections 11.5.2-11.5.5, pp.7-9; Appendix E, Section 3.2, pp.7-11). In addition, the monitoring plan has yet to be agreed with Cork County Council and Inland Fisheries Ireland. As Article 6(3) of the Habitats Directive requires, the Commission must be satisfied, beyond reasonable scientific doubt, that there will be no adverse effect on the Blackwater site or on the drinking water receptors. I would also ask that the applicant be required to clarify precisely what water will be allowed to enter the soakaway and how it will be treated prior to infiltration.

b. Hydrology and Flooding

From local observation, this land is often wet and waterlogged. The issue is therefore not simply whether an engineered drainage system can be constructed, but whether permanent high-voltage infrastructure belongs in a hydrological setting of this kind. Appendix N (Sections 1.4.1.2 and 1.4.1.3, pp.28-29) states that the substation footprint is approximately 1.8 hectares, and describes the impact on land taken up by the substation and by new and upgraded access tracks as "moderate, adverse and permanent". It also refers to excavation to a depth of approximately 3.6 metres, combined cut and fill for the substation and BESS of approximately 25k cubic metres, and approximately 9,320 cubic metres of imported stone to cap the platform to 400mm. Works on this scale would represent a major intervention in the existing soil, drainage and water retention regime.

While Appendix N (Section 1.8.3, pp.49-51) states that the site lies outside the mapped flood zones, it also accepts that the neighbouring Tourig_020 and Glendine_010 watercourses have indicative flooding mapped in low and medium probability zones. It further notes that "local knowledge has also indicated that local flooding is occurring within the same river sub-basin of the site". The fact that no flood zone is mapped beneath the substation does not mean there is no risk. What matters is whether the development would make flooding worse elsewhere in the same system.

The applicant's Flood Risk Assessment estimates that a 1-in-100-year storm would result in a net increase in runoff of approximately 0.016 to 0.185 cubic metres per second, equivalent to up to about 4.15% relative to the micro-catchment (Appendix N, Section 1.9.1.1, pp.60-61).

That section also acknowledges that construction will increase runoff and that, in the absence of mitigation, flooding could occur either on site or downstream. It further concedes that poorly designed drainage could open up new preferential pathways and cause erosion. Given that this is a permanent installation in a catchment where local flooding is already known to occur, the Commission should insist on robust, site-specific evidence, gathered under wet-season conditions, demonstrating that downstream flows will not be made worse.

I've included pictures below of the flooding of this area during Storm Babet in 2023.

c. Site Location and Consideration of Alternatives

Under the EIA Directive (2014/52/EU), as transposed through the Planning and Development Act 2000, as amended, and the Planning and Development Regulations 2001, as amended (Schedule 6), an EIAR must describe the reasonable alternatives that were studied and set out the main reasons for selecting the chosen option. The EPA's 2022 guidelines on EIARs reinforce this. I have been unable to find any comparative assessment of alternative locations along the 220kV route. The only apparent reason for choosing this site is that the landowner has agreed, which is a commercial matter rather than a planning consideration. No clear selection criteria are provided, and environmental constraints are not compared against other options.

The applicant's own documentation indicates a significant impact on more than 300 homes. Other locations along the same route could potentially have lessened that impact, yet none have been put forward. Local residents have made submissions to Cork County Council and organised petitions, which in my view indicates that consultation was not meaningful. Some of the drainage investigations seem to have taken place during dry summer weather, which is not representative of a site known to be wet. Access is proposed from the R634 by way of a new entrance; however, the local roads serving the site are poorly suited to heavy goods vehicles and to emergency access in wet weather. I was also unable to find any letters of support from EirGrid or ESB Networks for this specific location.

I would also draw the Commission's attention to the fact that Cork County Council has already refused the related solar farm application on two occasions. Local residents are strongly opposed to this development, and I would respectfully submit that this is simply not the right location for it.

In my view, this location is unsuitable for a structure of this nature. There are three schools, a community hall and a church in the immediate vicinity of the proposed compound as well as numerous agricultural contractor in the area. This is the heart of our community, and it is our children and future generations who will live with the consequences of this development.

Conclusion

For the reasons set out above, I respectfully request that the Commission refuse permission for the substation. Should the Commission not be minded to refuse, I would ask that further information be sought on the following issues:

- the design of the drainage and soakaway system;
- oil containment;
- hydrological evidence gathered in wet-season conditions;
- the effects on the Blackwater and on drinking water receptors; and
- a full comparative assessment of reasonable alternative locations.

I am grateful to the Commission for considering this Observation. Please see below pictures from the flooding of this area during Storm Babet in 2023.

Thank you,

Mary O'Callaghan

The junction at Inch Church



The bridge at Inch



Inch village



Inch Church



Park Creamery Road 1



Park Creamery Road 2



Extract from Appendix C – Greenhills Solar Farm Site Investigation Results

(marked up with red to indicate Inch village on the map which is roughly 0.8 miles from the proposed substation as the crow flies)



Figure 1: Proposed Site Location (Yellow Pins)