Sue Gardiner

Mullara Park

Youghal

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 live between 50 and 200 metres from the proposed substation site and make this Observation on the substation application only. I do not object to renewable energy in principle. However, the substation is permanent infrastructure. It would remain after any decommissioning of the separate solar farm, so it must be assessed on its own merits.

1. Visual Impact on Nearby Homes

The LVIA applies GLVIA3 methodology with 24 viewpoints and accepts that residential receptors are highly sensitive. At page 28 it states that "Several residential dwellings are located in the surrounds of the proposed substation building". It does not then provide a dedicated residential visual assessment of the substation from the nearest houses. Viewpoints VP4 and VP5 are described as repres

enting nearby dwellings, yet their analysis addresses solar panels, hedgerows and screening rather than the substation.

My concerns also include regular visitor to my garden, foxes, hedgehogs, Squarrels ,Rats,Deer, ferrets, weasels, hares, the red squirrel , Cattle, and Sheep,

ECT, Views to the Valley , this is totally inappropriate to the area ,its a huge agriculture area ,and water pollution, once its here its here for ever, and there is no decommission plan in place, property prices will also be affected.

The substation is a substantial installation. The LVIA describes a compound of approximately 22,632 square metres, a 438 square metre control building, a 590 square metre IPP building, two 220kV transformers, outdoor electrical equipment, lighting on masts, 2.6 metre perimeter fencing and lightning protection masts of approximately 18 metres. It also identifies lattice support structures of 37.5 metres. The LVIA reasons that panels not exceeding 3.4 metres will be screened by vegetation and landform. That reasoning cannot be transferred to masts of 18 and 37.5 metres, which may rise above hedgerows. No ZTV analysis or visualisation from the affected homes tests this.

The LVIA also relies on new planting with a three year establishment period. There is no information on what residents will see at completion, after three years, after ten years, or in winter when deciduous cover is absent.

2. Site Selection and Alternatives

Schedule 6 of the Planning and Development Regulations 2001, as amended, which transposes Directive 2014/52/EU, requires an EIAR to describe the reasonable alternatives studied and the main reasons for the choice made, taking account of

environmental effects. The EPA Guidelines on the information to be contained in EIARs (2022) are to the same effect. I can find no comparative assessment of other locations along the 220kV route. The only apparent basis for this site is the availability of a willing landowners, which is not an empirical selection criterion.

The application documents indicate significant effects on a large number of homes, reported as over 300. Alternatives might have reduced this, but none is presented. Nothing in the documents shows how alternatives were considered during pre-application consultation. I also find no letter of support from EirGrid or ESB Networks for this location.

The drainage investigations appear to have been carried out in dry summer conditions, whereas the site is frequently wet and waterlogged. Access is from the R634 via a new entrance, but the local road network is, in my view, unsuitable for heavy goods vehicles and emergency vehicles in wet conditions. The road appendices understate this.There are 2 otters and an otters nest.which are protected

3. Water Pollution

The site drains through the Carignass, Knocknappagh, Ballyleague, Ballygarvin and Youghal Park streams and the Tourig and Glendine rivers to the River Blackwater,this is Youghal's

Water supply, and this area is a European designated site. The applicant's own CEMP acknowledges construction pollution risk and the need to address risks to watercourses in each phase (CEMP Section 2.4, p.9).

The CEMP Spoil Management Plan (Appendix B, pp.3-4) describes approximately 13,600 cubic metres of topsoil and 39,690 cubic metres of subsoil being recontoured over 4.71 hectares. This would leave extensive exposed ground at risk of silt and sediment runoff. The CEMP (Appendix F, Section 3.2) records an extensive network of historic drains and unmapped channels connecting to the Tourig and on to the Blackwater. It also identifies EPA designated drinking water rivers as sensitive receptors (Sections 3.1 and 3.5).

The site lies largely over the Glenville Groundwater Body, a locally very important aquifer, with high groundwater vulnerability across most of the site and extreme

vulnerability to the south. Despite this, surface water is proposed to go to infiltration, including a soakaway of 5m x 5m x 1.8m within the compound (CEMP Sections 3.3, 3.4 and 3.2.2). Two 33/220kV transformers will contain oil. Appendix C, Section 11.5.4.4 and the Water Quality Monitoring Plan accept that, despite mitigation, a residual risk of accidental spillage, leaks and overloading of drainage infrastructure remains. The extensive construction controls proposed, including settlement tanks, silt screens, flocculation, turbidity monitoring and daily pH testing, themselves indicate that the risk is substantial. Key details are left to be agreed before construction. I submit that the Commission cannot be satisfied beyond reasonable scientific doubt, as Article 6(3) of the Habitats Directive requires, that there will be no adverse effect on the Blackwater site.

4. Hydrology and Flooding

Appendix N states that the substation footprint is approximately 1.8 hectares and that the effect on land occupied by the substation and new access tracks will be "moderate, adverse and permanent". It records excavations of up to approximately 3.6 metres and approximately 9,320 cubic metres of imported stone to cap the platform to 400mm (Sections 1.4.1.2 and 1.4.1.3, pp.28-29). These are significant interventions in a soil and drainage regime that is already wet.

The site is not in a mapped flood zone. However, Appendix N acknowledges mapped indicative flooding in low and medium probability zones on the adjacent Tourig_020 and Glendine_010 watercourses. It also records that "local knowledge has also indicated that local flooding is occurring within the same river sub-basin of the site" (Section 1.8.3, pp.49-51). Absence of mapping beneath the platform is not absence of risk. Storm Babet in 2023 caused fierce damage to the roads which Park road was closed for 2 years due the the storm and flooding and roads were washed away,

The applicant's Flood Risk Assessment calculates that a 1-in-100-year event would produce a net increase in runoff of approximately 0.016 to 0.185 cubic metres per second, up to approximately 4.15 percent relative to the micro-catchment. Appendix N accepts that construction will increase runoff and that, without mitigation, flooding could occur on site or downstream, and that poorly designed drainage could create new preferential pathways and erosion (Section 1.9.1.1, pp.60-61). Where downstream flooding already occurs, any increase matters. Assessment based on dry-season conditions is inadequate. Winter ground-water and wet-weather evidence is needed.

5. Request

For these reasons, I respectfully ask the Commission to refuse permission. At a minimum, I ask it to seek further information on the following:

- a dedicated residential visual assessment of the substation, including ZTV analysis and winter and year-ten visualisations of the 18 metre and 37.5 metre structures

- a comparative assessment of reasonable alternative sites along the 220kV route

- winter hydrological and groundwater survey evidence

- detailed oil containment and infiltration treatment proposals

- a road and emergency access assessment

Thank you for considering this observation.

Is mise,

Sue Gardiner

These are pictures of the area in the immediate vicinity of the proposed substation location taken in the aftermath of 2023 storm Babet:

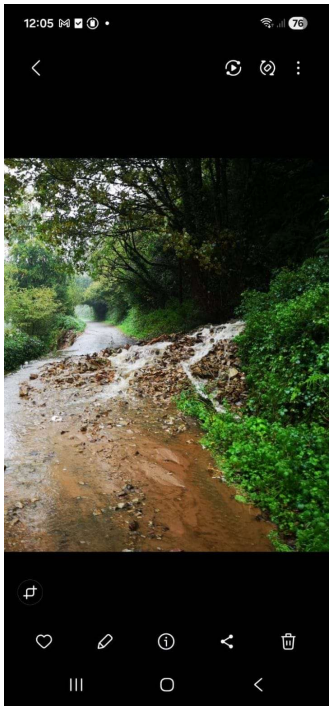
Park Creamery by the bridge



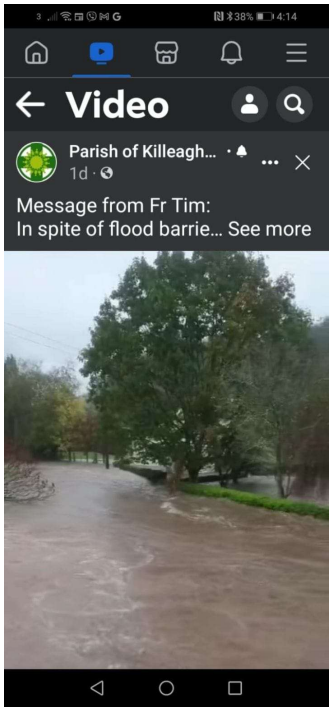
Park Road



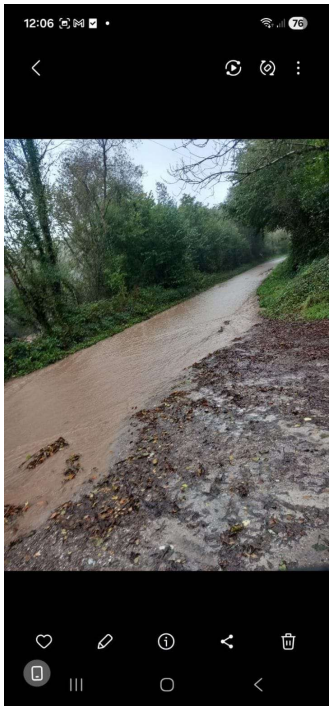
Park Road



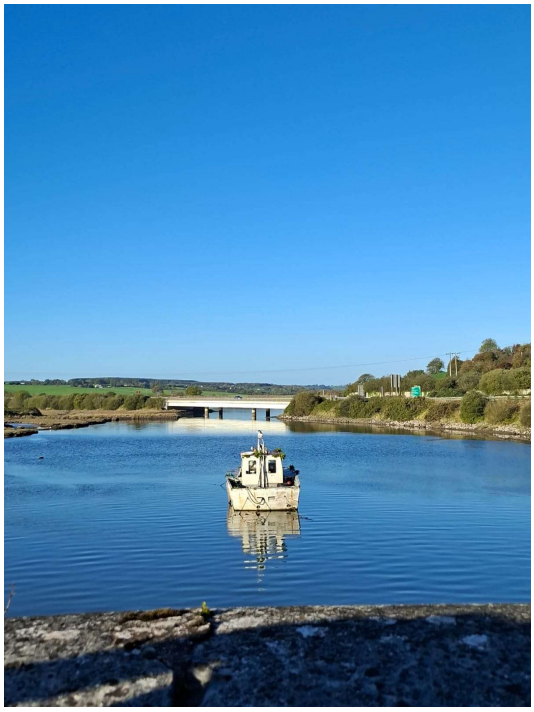
Close to Inch Church



Park Creamery Road



The Tourig river entering Youghal



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