Tony & Peggy O'Neill
Ballydaniel
Lackaroe
Youghal
Co. Cork

17th 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,

We are Tony and Peggy O'Neill. Our home is less than 50 metres from the proposed development. This observation concerns the substation application only. The substation is permanent and would remain if the solar farm were decommissioned, so it must be assessed on its own merits.

1. Noise and Vibration

This is our paramount concern. My husband has been diagnosed with vascular dementia and would not be able to cope with sustained noise at a sensory level. Our home is immediately next to the site.

The only noise assessment on file, Appendix S, is titled for the Greenhills Renewable Energy Park. It covers the solar farm, the battery compound and the substation together. The closest distances in Table 1.1, 5 m and 8 m, are to the energy park boundary and not to the platform on drawing 300101185-DR-213. The report gives no distance from the compound or the access to any house. Its own test, taken from BS 5228, is a level of 65 dB at a house for more than 10 days in 15 or 40 days in six months. Section 5.5.6.1 puts the substation works at about 16 months, so the duration limb is met if the level is. That level has not been calculated for this platform, this access, or the haul to Site Access No. 1 on the R634. There is no EIAR.

The earthworks figures are also inconsistent. Drawing DR-213 shows a cut of 17,304 m3 and a fill of 34,649 m3, while its notes give 36,649 m3 plus 9,490 m3 of capping stone. Section 5.5.6.1 gives 25,013 m3 and says all excavated material will be reused. On the drawing figures, fill exceeds cut and must be imported by road, together with the stone and the transformers. We are also concerned for Park School, a small rural school, where sixteen months of works and heavy traffic could affect pupils' concentration and, in time, the school's future.

2. Archaeology

The Appendix R avoidance measures are solar measures: non-intrusive gabion or ballasted foundations and stand-off buffers. They cannot apply to a compound formed by cut and fill, as shown on drawing DR-213. The geophysical survey (licence 26R0042) is described as covering a significant portion of the site, not all of it. The applicant does not state that the compound, tower bases or widened access were within the surveyed area. Paragraphs 6.34 and 6.35 rely on monitoring during construction, with preservation in situ only "where feasible". On a platform already approved, that means recording and then building. Cork County Council has already told this developer that sub-surface archaeology must be assessed before a decision on the solar application.

Appendix R records a hillfort in Rath townland (CO067-001001), 490 m west of the site boundary, but contains no specific assessment of the effect of a permanent compound, lightning masts and new towers on its setting. There are lime kilns on the site, and Ardagh Church and graveyard lie only metres away. Local people also understand that souterrains may link the nearby forts. We ask that no decision be made until buried archaeology is properly known.

3. Site Location, Alternatives and Access

The site is open, rural land with no hedging, and we do not see how a station of this scale can be screened from nearby homes. We can find no objective comparison of reasonable alternative sites along the 220kV route, as is required for an EIA under the Planning and Development Regulations 2001 (as amended). The site appears to have been chosen on landowner willingness, which is not a planning criterion. We also find no letter of support from EirGrid for this location.

Site Access No. 1 on the R634 (Youghal-Tallow Road) is on a busy road that is only straightening at the proposed entrance. Our home is just off this road. Slow, heavy construction vehicles turning there, and the abnormal load of transformer delivery, create a real risk of collisions. The road approach is not suited to heavy vehicles or

emergency access in wet conditions.

4. Hydrology and Flooding

The village of Inch flooded badly in Storm Babet in 2023. It has many homes, our church and our community centre. The River Tourig flows through it and supplies drinking water to Youghal. Appendix N accepts that the Tourig_020 and Glendine_010 watercourses have mapped flooding and that local knowledge records flooding in the same sub-basin. It describes the effect on land taken by the substation and access tracks as "moderate, adverse and permanent". It records excavation of up to about 3.6 m and a Flood Risk Assessment increase in 1-in-100-year runoff of up to about 4.15 percent in the micro-catchment. A site that is not itself in a mapped flood zone can still worsen flooding downstream. The drainage investigations also appear to have been carried out in dry summer conditions, when the ground is known locally to be waterlogged for much of the year. We ask for assessment in least favourable winter conditions, with specific attention to Inch and the Tourig.

5. Regulatory Framework

We understand there is no specific national guidance for substations of this kind. Section 15(1) of the Climate Action and Low Carbon Development Act 2015 requires the Commission to have regard to climate objectives only "insofar as practicable". It does not displace the duty to weigh biodiversity, archaeology, landscape and the lives of nearby residents. The EIA Directive (2011/92/EU as amended by 2014/52/EU) requires a full and independent assessment, and the applicant's own documents cannot simply stand in for it. The Appendix S and Chapter 15 conclusions relate to the energy park, and Section 3.7.6 of the screening report relies on them.

6. Request

For these reasons we respectfully ask the Commission to refuse permission. At the very least, we ask that further information be requested, including a noise and vibration assessment of this compound, access and haul route at the nearest homes, a sub-surface archaeological assessment of the compound and access, a comparison of reasonable alternative sites, a road safety assessment of Site Access No. 1, and a winter flood and drainage assessment for Inch and the Tourig.

Thank you for considering our observation.

Is mise,

Tony and Peggy O'Neill