Joe and Breda Fitzgerald
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28th 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 farmers and horse breeders. Our home and business lie approx. 200 metres from the solar development boundary. Our family has worked this land for over 60 years. We support renewable energy and have no objection in principle to appropriately scaled solar development. This Observation concerns only the substation application. The site notice seeks permanent permission, and the station would remain, and be handed to EirGrid, if any solar farm were decommissioned. We ask the Commission to assess it as a permanent industrial installation.

This application should be subject to the most rigorous scrutiny given its unprecedented nature. We recognise the importance of solar power in Ireland's energy transition. However, proper planning requires that renewable energy developments be appropriately scaled and sited to avoid disproportionate harm to existing communities, businesses, and residents.

The noise assessment does not address these works
The only noise and vibration assessment we can find is Appendix S, which is titled for the Greenhills Renewable Energy Park. Section 1.1 says it covers the solar farm, trenching, the substation, the battery compound and operation of all three. It is not an assessment of the substation and access alone. Table 1.1 gives distances to the energy park red line, the closest being 5 m and 8 m. These are not distances from the platform shown on drawing 300101185-DR-213 or from the access, and the report gives no distance from either to any house.

Chapter 15 of the Planning and Environmental Report and section 3.7.6 of the EIA Screening Report repeat the conclusion that construction noise is temporary and operational noise is not significant. Those conclusions rest on a report written for a different and larger project. There is no EIAR. In our view the Commission cannot safely rely on them for a permanent station.

The report's own test, at section 1.2.5.1 and taken from BS 5228, is a level of 65 dB or more at a house, lasting more than 10 days in any 15 or more than 40 days in any six months. Section 5.5.6.1 of the Planning and Environmental Report puts the substation works at about 16 months, so the duration limb of that test would clearly be met. Whether the level limb is met has not been calculated for this platform, this access or the haul route to Site Access No. 1. The 23 to 45 dB column in Table 1.28 is not that calculation. Compliance with the report's own threshold has therefore not been demonstrated.

Horses, vibration and operational noise

Horses are highly sensitive to noise and vibration. Sustained construction activity next to our land, including excavation, heavy plant and plant delivery over about 16 months, risks stress, behavioural change and injury, and would directly harm our breeding business. We see no assessment of effects on animals, and no distance-based vibration assessment for our boundary.

Once operational, the transformers will hum day and night. Low-frequency noise carries well in quiet countryside and is most intrusive at night, when background levels are lowest. Continuous low-frequency noise is widely recognised as a cause of sleep disturbance and stress. No operational noise level has been calculated at our home from this compound. The station is permanent, so this exposure would be permanent too.

Construction traffic and the roads

The access in this application is the red route on drawing 300101185-DR-100B, running north and then east to Site Access No. 1 on the R634. A note on that drawing places an access track in the other application, but that does not remove the access this application seeks. Traffic for fill, capping stone and transformer delivery is traffic of these works.

For sixty years we have ridden horses on the roads around the site, as did my father before me, and we have passed the practice on to our children and grandchildren. It is also how we exercise and train horses for our business. Every road we use is on the construction traffic routes. Heavy vehicles and horses cannot safely share these roads. We also question whether the approach road is suitable for abnormal loads or for emergency vehicles, particularly in wet winter conditions.

Heritage setting

The site lies about 700 metres from Rath fort which has archaeological and tourism significance, further demonstrating the inappropriate nature of industrial-scale development in this sensitive landscape.

The effect of a permanent 220kV installation and its construction works on that setting has not, in our view, been adequately considered.

Request
We respectfully ask the Commission to refuse permission. At a minimum, we ask the Commission to seek further information, namely:
- a noise and vibration assessment specific to the substation, loop-in and access, with distances to named houses and animal enclosures
- an assessment of the roads for horse riders and emergency access

Thank you for considering this Observation.

Is sinne,

Joe and Breda Fitzgerald