Maurice O Connor
Ballydaniel
Lackaroe
Youghal
Co. Cork

20th 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 on the R634 with my property located less than 50 metres from proposed Site Access No. one and between 500 metres and 1 kilometre from the proposed substation compound. As a broadcasting professional who conducts audio recordings from my home and a writer requiring peaceful conditions for creative work, the proximity of this massive development presents insurmountable challenges to my livelihood and quality of life. Both activities depend on quiet and controlled conditions. I am gravely concerned about the significant adverse impacts this industrial-scale facility will have on my residential amenity, property, health, and the surrounding environment.

This observation concerns the substation application only. The solar farm and battery storage are a separate application. The substation is sought permanently, to remain if the solar farm is decommissioned, and I ask that it be assessed on that basis.

(a) The noise assessment is not an assessment of this development

Appendix S is titled for the Greenhills Renewable Energy Park. Section 1.1 states that it covers solar farm construction, open-cut trenching, construction of the substation and battery compound, and operation of all three. Chapter 15 of the Planning and Environmental Report and section 3.7.6 of the EIA Screening Report rely on it to conclude that construction noise is temporary and operational noise is not significant. There is no EIAR. A report written for a combined energy park cannot stand as the noise and vibration assessment of a permanent substation and its access.

The proposed development will generate multiple sources of continuous and intermittent noise that will severely impact my residential amenity and professional activities. The construction phase alone involves months of heavy machinery operation, and excavation works commencing from 6:00am daily. For a residence located less than 1km from construction activities but less than 50m from site entrance number one, this represents an unacceptable disturbance to peaceful enjoyment of my property.

My professional work as a broadcaster requires controlled acoustic conditions for audio recording. The sustained construction noise and traffic entering the site over an extended build period will render my home workspace unusable, directly impacting my livelihood. Similarly, my work as a writer demands concentration and quiet conditions which will be impossible to maintain during the intensive construction phase.

Beyond construction, the operational phase presents ongoing noise concerns. Low-frequency noise from inverters etc travel considerable distances in rural environments and will be particularly intrusive during night time hours when background noise levels drop.

The Irish Environmental Protection Agency's guidance on noise in relation to proposed wind energy developments states that noise limits should protect residential amenity. While specific guidance for solar farms and substation remains limited, the principle of protecting residential amenity from industrial noise sources remains applicable. At less than 50 metres distance, my property will experience noise levels incompatible with residential use and professional home-based work.

A 220kV station will produce transformer hum, which is tonal and low frequency. Such noise carries in a quiet rural setting and is most intrusive at night when background levels fall. The file does not show a night-time assessment of this permanent source against measured background levels at the nearest houses, using a recognised method such as BS 4142. Because the station is permanent, this matters more than it would for a temporary installation. The protection of residential amenity requires it.

(b) Suitability of the access road – site entrance number 1 on the R634

The access in this application is the red route on drawing, running to Site Access No. 1 on the R634. The note on that drawing assigning an access track to the energy park application does not remove the access applied for here. Imported fill, capping stone and transformer deliveries are traffic of these works. I understand that works are proposed from 6:00am. Passing within 50 metres of my home, that traffic and the associated plant would make recording and concentrated writing impossible for the best part of 16 months. No assessment of that noise or vibration at my property has been provided.

The R634 and surrounding rural road network was designed for light agricultural traffic and private vehicles, not the intensive heavy goods vehicle movements required for this development. Construction will require HGVs transporting heavy machinery, transformers on narrow rural roads with limited passing places.

My home sits directly on the R634 with parking spaces close to the roadway. The dramatic increase in HGV traffic presents direct safety risks to my property and vehicles. The construction phase lasting approximately two years will see daily heavy vehicle movements creating sustained danger.

The traffic assessment appears to inadequately consider cumulative impacts from concurrent wind turbine construction traffic in the area, potentially doubling HGV movements beyond assessed levels. This represents a significant underestimation of actual traffic impacts

(c) Biodiversity

The development site and surrounding area supports significant wildlife populations including protected species. I regularly observe hares, deer, snipe, and curlews in the vicinity. Curlews are a protected species under the Wildlife Acts and the EU Birds Directive. The derelict house directly across from my property on the R634 provides habitat for barn owls and bat populations, both strictly protected under Irish and European law.

The ecological assessment appears to rely primarily on desktop studies with limited field survey work noted. For a site of 800 acres including the substation with diverse habitats, this level of ecological assessment is inadequate to identify all protected species and assess impacts comprehensively.

The site includes badger setts, some potentially associated with TB-positive populations. Disturbance and relocation of badgers risks spreading bovine tuberculosis to new areas, presenting agriculture and public health concerns.

Fencing the over 10 acre site will fragment wildlife corridors and force deer populations onto roadways, increasing collision risks for motorists. The Tourig River Special Area of Conservation, designated for lamprey species protection, lies within the potential pollution impact zone. Construction phase runoff and operational contamination risks threaten this protected conservation area.

Conclusion

For these reasons, the application has not demonstrated that the permanent substation and its access can be built and operated without serious injury to residential amenity and the environment. I respectfully ask the Commission to refuse permission as contrary to the proper planning and sustainable development of the area.

In the alternative, I ask the Commission to require further information, including:
- a noise and vibration assessment specific to the substation platform, the loop-in works and the access to Site Access No. 1, with distances and calculated levels at the nearest houses
- reconciliation of the earthworks and import figures, with the associated traffic
- a night-time operational noise assessment of the permanent station

Thank you for considering this observation.

Is mise,

Maurice O Connor