

SUBMISSION / OBSERVATION — 110KV SUBSTATION

Cunlaghfadda 110kV electrical substation and associated transmission development, Cloonbaul, Co. Mayo

Objectors / observers	Áine Matthew Mark Iarfhlaith O'Sullivan (minor)	O'Sullivan O'Sullivan	Boyle (minor) (minor)
Correspondence address	Knockroe Mayoabbey Claremorris Co. Mayo		
Date	24 August 2026		
Planning reference	An Coimisiún Pleanála - Case reference: VA16.324429		

Strategic Infrastructure Development Section
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Dear Sir or Madam,

We object to the proposed 110kV substation and associated transmission development. I, Áine Boyle, make this submission on my own behalf and on behalf of my three minor children, Matthew O'Sullivan, Mark O'Sullivan and Iarfhlaith O'Sullivan. We live at Knockroe, Mayoabbey, Claremorris, Co. Mayo, close to the related Cunlaghfadda wind energy project and its proposed infrastructure.

I am an organic farmer and operate cattle, sheep and specialist equine breeding activities. Our lands, home and children's future are directly affected by the combined turbine, substation, cable, access and construction proposals. My farm boundary is approximately 40 metres from proposed Turbine T7, and our house is approximately 880 metres from T7.

The site notice describes a 110kV compound with two control buildings, electrical plant, underground cabling, lighting columns, lightning masts, fencing, tanks and gates; approximately 982 metres of underground 110kV cabling; two approximately 16-metre end masts; a 36-metre telecommunications tower; construction compounds and access tracks; tree and vegetation removal; drainage; and ancillary works. This is substantial permanent industrial infrastructure, not a minor utility installation.

1. The substation is an enabling element of the wind farm and must be assessed with it

The application materials identify the purpose of the development as connecting the proposed Cunlaghfadda wind farm to the Castlebar–Cloon 110kV overhead line. The site notice expressly states that the EIAR and NIS assess the substation together with “integral elements of the wider project infrastructure” consisting of the seven-turbine wind farm. The wind farm application also includes cabling connecting the turbines to this proposed substation.

The substation therefore has no properly explained purpose in isolation from the turbines. The decision-maker must assess the real project as a whole and cannot treat the electrical component as environmentally or functionally independent merely because a separate consent procedure is used. At minimum, all cumulative effects of the turbines, substation, cable route, end masts, telecommunications tower, roads, drainage and construction activity must be considered together.

2. No credible standalone need following refusal of the turbines

Mayo County Council refused the seven-turbine wind farm on 13 July 2026. That refusal does not automatically determine this application, but it fundamentally affects the asserted need and planning context. Permission should not be granted for a large industrial compound intended to connect a wind farm for which permission has been refused unless a clear, current and independent network need is demonstrated.

The applicant should be required to establish:

- the precise generation or network function the substation will serve if the seven-turbine scheme does not proceed;
- why this exact rural and heritage-sensitive site is required;
- whether its electrical capacity, layout and connection design are specific to the refused wind farm;
- what alternative sites and connection methods were considered, including use or upgrading of existing infrastructure; and
- whether the proposal would facilitate a materially similar future wind project and thereby pre-commit the site before that project is assessed.

3. Personal effect on our family and three minor children

The proposed development would add another permanent industrial element to the environment in which my three children live and grow up. It includes a 36-metre telecommunications tower, end masts, lightning masts, plant, fencing, security infrastructure, lighting and access works. These features would alter the rural outlook and would operate alongside any turbines and associated cabling for decades.

Potential effects include transformer hum and tonal or low-frequency noise against a quiet night-time background, security and operational lighting, construction noise, heavy deliveries, traffic, vegetation removal and the continuing visual presence of an industrial compound. These effects must be assessed from the perspective of a nearby family home and not merely by reference to general compliance limits.

4. Sterilisation of lands and future homes for Matthew, Mark and Iarfhlaith

The substation compounds the risk that our family lands will be sterilised or materially constrained for future housing. My children are minors now, but the requested ten-year permission and the expected life of the infrastructure extend into the years when they may wish to live near their family and establish homes in their own community.

We do not assert an automatic right to obtain planning permission. Our concern is practical and foreseeable: a future dwelling could be resisted because it would be a new sensitive receptor near a substation, transformer, cable route, end mast, telecommunications tower, access road or turbines. The combined infrastructure could leave no realistic family housing site even though each separate application understates that cumulative land-use consequence.

Our land should not become an unacknowledged buffer for private infrastructure. A parcel-specific map should identify all noise, visual, access, safety, cabling, drainage and operational constraints imposed on our holding, the residual area capable of accommodating a dwelling, and the cumulative effect of the substation and wind farm. Without this, the effect on the next generation has not been properly assessed.

5. Equal treatment and protection of our property interests

I do not understand why our property should receive less protection than neighbouring properties. If the project design protects other dwellings or holdings through distance, screening, relocation, curtailment or other mitigation, equivalent objective criteria must be applied to our home and lands. Any difference should be expressly identified and justified.

The planning process should not place a disproportionate burden upon our family merely because potential homes for the children have not yet been built. Nor should any private agreement or participation by another landowner result in our non-participating lands carrying the environmental buffer

or planning constraint. Our present use, future land-use options and right to fair consideration all require meaningful weight.

6. Landscape, visual impact and Mayo Abbey heritage setting

Mayo County Council found the wider development location to be an open, exposed and populated rural area within Policy Area 4, with high-to-medium potential for adverse effects on landscape character. It also found that the turbine development would undermine the setting of Mayo Abbey Cemetery and Church ruins, erode public views and adversely affect the unique rural character of the area.

Although lower than turbines, this proposal includes a 36-metre telecommunications tower, approximately 16-metre end masts, lightning masts, lighting columns, electrical plant, buildings, fencing, gates, hardstandings and access tracks. In an open rural landscape, their combined industrial character may be prominent. The assessment must address views from homes, local roads, scenic routes, Mayo Abbey Cemetery and Church ruins, and the approaches to that important ecclesiastical site.

7. Residential amenity, noise and lighting

The area is not a remote industrial location. Mayo County Council's wind farm decision expressly recognised the significant number of surrounding residences. The substation assessment must therefore establish the likely tonal, impulsive and low-frequency characteristics of transformer and electrical plant noise at day and night, not merely quote average limits.

Lighting should also be assessed on a worst-case basis, including security lighting, operational and maintenance lighting, tower or aviation lighting if required, reflected light and cumulative lighting with the wind project. Conditions to minimise lighting do not substitute for selecting an appropriate site in the first place.

8. Organic farm, Japanese knotweed and biosecurity

I manage an organic holding and cannot use chemical herbicides as an ordinary response. The wider project documentation acknowledges Japanese knotweed within project and access areas. Construction of the substation, 982 metres of cable trench, tracks, drainage, hardstandings and end-mast areas would involve machinery and soil movement and therefore create pathways for invasive material.

The assessment must identify the exact infestation areas, machinery routes, soil storage and disposal arrangements, drainage pathways and measures preventing transfer to neighbouring lands. It must also address the consequences for an organic farmer if prevention fails. A generic management plan or post-event treatment promise does not remove the risk to organic status, biodiversity, land use and value.

9. Hydrology, drainage and pollution risk

The proposed works include extensive underground cabling, hardstanding, drainage and tanks. The decision-maker must assess sediment release, altered runoff, watercourse interaction, accidental fuel or transformer-oil release, containment capacity, firewater, wastewater holding, construction dewatering and cumulative hydrological effects with the wind farm and road works.

The environmental assessment must be complete, precise and definitive in relation to European sites and protected habitats. The apparently smaller footprint of a substation does not justify overlooking cable trenches, access roads, end masts, tree removal or in-combination effects across the wider project.

10. Construction traffic, access and farm operations

The compound will require deliveries of transformers, plant and construction materials, together with excavation and cable works. Heavy traffic on local roads creates safety and disruption concerns for residents, school journeys, walkers, farm machinery and livestock movements. Mud, soil and plant material on vehicles also increase biosecurity risk.

The construction traffic plan should be assessed together with turbine delivery and road accommodation works rather than on the assumption that the projects will proceed separately. The effects on access to

our farm, safe movement of cattle, sheep and horses, emergency access, road condition, culverts, verges and drainage must be specifically addressed.

11. Alternatives and risk of premature site commitment

The application should demonstrate that reasonable alternatives were genuinely examined, including alternative connection points, locations farther from homes and heritage receptors, reduced or underground configurations, and use or adaptation of existing substations. The fact that this location is convenient for the proposed wind farm is not a sufficient standalone planning justification after that wind farm has been refused.

Granting the substation could create pressure to approve a future or redesigned turbine scheme on the basis that grid infrastructure is already permitted. That would pre-commit this sensitive location and reverse the proper sequence of environmental assessment. The Commission should avoid creating such a fait accompli.

12. Request and summary grounds for refusal

We respectfully request refusal because:

1. the substation is an enabling and integral element of the seven-turbine project and its effects cannot be artificially separated;
2. a credible standalone need has not been established in light of Mayo County Council's refusal of the turbines;
3. the compound, tower, masts, cabling and associated works would industrialise an open, populated and heritage-sensitive rural landscape;
4. the effects on our family home and three minor children through noise, lighting, traffic, visual intrusion and cumulative disturbance are unacceptable or inadequately assessed;
5. the proposal would compound the potential sterilisation of our family lands and prejudice future housing opportunities for Matthew, Mark and Iarfhlaith;
6. the application does not demonstrate fair and consistent protection of our property compared with similarly situated neighbouring properties;
7. construction and soil movement create unacceptable invasive-species and biosecurity risks for our organic farm;
8. hydrology, drainage, pollution, traffic and farm-access effects require fuller integrated assessment;
9. reasonable alternatives and the claimed regional or network need have not been adequately demonstrated; and
10. permission would prematurely commit the location to energy infrastructure despite the refusal of the generation project it is intended to serve.

Yours faithfully,

Áine Boyle

for herself and as mother and guardian of Matthew O'Sullivan, Mark O'Sullivan and Iarfhlaith O'Sullivan

Address for correspondence: Knockroe, Mayoabbey, Claremorris, Co. Mayo

Signature: Áine Boyle Date: 25/08/26