

Brian Flatley
Knockaunakill, Co. Mayo
30/08/2026

The Secretary, An Coimisiún Pleanála, 64 Marlborough Street, Dublin 1, D01 V902

Re: Observation on Case Reference VA16.324429 Proposed 110kV Substation, Loop-In Grid Connection and Associated Infrastructure at Cloonbaul, Co. Mayo (Applicant: Cunlaghfadda Green Energy Limited)

Dear Sir/Madam,

I wish to lodge this observation objecting to the above-referenced Strategic Infrastructure Development application, made under Section 182A of the Planning and Development Act 2000, as amended. The €50 fee accompanies this submission. I am currently building my home at Knockaunakill, in close proximity to the application site, and am among the most directly affected parties.

I object to the grant of permission on the following grounds, taken individually and cumulatively:

1. Unlawful splitting of a single project. This substation exists to connect the Cunlaghfadda Wind Farm (Ref. P26/60398, refused by Mayo County Council on 13/07/2026, now under appeal) to the grid. A third connected project, a Battery Energy Storage System with fire-water tanks and an 18m lightning mast, has since been announced for the same site at Cloonbaul. Article 2(1) and Annex III of the EIA Directive (2011/92/EU, as amended by 2014/52/EU) require the cumulative effects of connected projects to be assessed together, and Ireland was found in breach of this requirement in *Commission v Ireland* (C-392/96). This application should be decided together with the wind farm and BESS, as one project.

This salami slicing of projects - not only disregards the above regulations and laws, but it is in my opinion a direct attempt to thwart local peoples ability to fully review and lodge observations and objections to all the applications. We are working people with families, jobs and responsibilities and on top of that have to contend with hundreds of pages of documentations across all applications to fully understand the impact on our day to day lives - we are not a corporation with funds to dedicated to writing applications, swerve planning processes with this type of breaking up applications etc. This is a bullying tactic, designed to limit our ability to object and it is our lives and local environment which will ultimately be impacted.

2. Archaeological heritage. The site overlaps or affects an enclosure identified in the 1995 Mayo Abbey archaeological survey as being of "immense importance," potentially prehistoric or Neolithic in date. The applicant's assessment appears to rely on desk-based research and visual inspection rather than geophysical or topographical survey. A comparable case at Kilbride, Co. Mayo, an unremarkable-looking enclosure that proper excavation revealed to be a Late Neolithic timber circle with Grooved Ware pottery dated to 3010–2470 cal BC, in my opinion this shows why in-situ preservation and proper investigation, ahead of any decision, matter here. I grew up in this area and acutely aware (and proud) of its archaeological depth; there are ring forts on our own family's land, which we have always avoided disturbing out of respect for that history. Family have been christened, educated and buried in and around Mayo Abbey, generations of people have work to preserve the heritage and importance of this area for future generations. It will be more than unfortunate to future generations to learn we were unable to continue this tradition at the expense of corporate greed. I wholly reject in any form this is to the betterment of Ireland's Green energy agenda. This is corporate entity looking to push and bully an unsuitable project into a landscape and jurisdiction far away from their own homes for financial gain.

3. Landscape and heritage precedent. Mayo County Council's refusal of the connected wind farm (P26/60398) found this site lies within Landscape Sensitivity Policy Area 4 of the Mayo County Development Plan 2022–2028, on a designated scenic route with a protected view, and that development here would undermine the setting of Mayo Abbey. A permanent 110kV substation compound introduces the same industrial impact into the same sensitive landscape, and its capacity to host further infrastructure, as the BESS confirms, compounds that impact.

4. Ecology. The site supports wintering Whooper Swan, Golden Plover and Snipe, and breeding Curlew, a Red-listed species. The ecological assessment relies substantially on the Bird Atlas 2007–2011, now outdated, and appears to undervalue declining species such as Meadow Pipit and Kestrel. The site's cutover bog, raised

bog remnant and species-rich wet grassland are amongst Ireland's most depleted habitats and warrant protection under the precautionary principle in Article 6(3) of the Habitats Directive (92/43/EEC) and the EU Nature Restoration Regulation (2024/1991).

5. Water, drainage and karst. Foundations, hardstanding, cable trenches and drainage works risk altering surface water runoff and creating pollution pathways to groundwater in this karst landscape, contrary to the objectives of the Water Framework Directive (2000/60/EC). We have witnessed this at first hand: local road L-55362 becomes flooded even in moderate rain, and the enclosed map marks three locations known to flood near the local farm buildings, the fields toward Kilbride, and near the Monaghan Bros premises. The swallow holes serving these fields cannot cope with heavy rainfall as it is; further hard standing and altered drainage would add to that burden. We have always taken care to carefully clear these drainage holes of debris and ensure free flowing waterways to as much as possible. Into the future, when these nature waterways are impacted by all this construction, this task will become infinitely more difficult and we will be the ultimate bearers of this impact and day to day challenges.

6. Noise, lighting and fire risk. Transformer noise, permanent security lighting and the fire and emergency-response profile of high-voltage infrastructure would affect a dark, quiet rural area. The applicant's own subsequent BESS announcement, with fire-water tanks and an 18m lightning mast at the same site, means these effects should be assessed cumulatively, project by project.

The design of our home, living area with views Croagh Patrick, retaining of natural stone walls on the boundary wall will be permanently affect and negatively impacted, the substation's lighting and fencing will bring light pollution to a rural setting that is currently dark and quiet. Our land, that our wider family might otherwise consider for a future home will no longer be suitable, given proximity to a substation, battery storage facility and wind turbines. This proposed development is taking our ability to support future generations to live and enjoy the local area as we have been fortunate to.

7. Need for complete information. The unresolved archaeological status of the recorded enclosure should not be deferred to conditions attached to a grant. An Coimisiún Pleanála needs sufficient information, including proper survey results, to decide whether this site is suitable before any permission is granted, consistent with the precautionary principle in Article 191(2) TFEU.

For these reasons I request that An Coimisiún Pleanála refuse permission for this development, or require the applicant to submit further information addressing each point above, including a combined assessment of the wind farm, this substation and the BESS as one project, before any decision is made.

Yours faithfully,

Brian Flatley