

Chris Flatley
Mossbrook, Claremorris, Co. Mayo
30th Aug 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 a farmer in Knockaunakill, as my father and grandfather were before me, and my greatest concern with this project is flooding. The fields here already flood most years, causing real difficulty for farming and for getting along local roads; once this construction and the permanent infrastructure it brings are in place, there will be no going back to make adjustments. I have tried, throughout my working life, to take environmental responsibility seriously, leaving arable field to grow on for bird feed under past government schemes, and keeping natural sand banks for wild bees, but because I wanted my children and grandchildren to see that modern farming and wildlife can be balanced. I do not see this project as "green" in any real sense: it brings construction risk to our waterways and flooding, wind turbines that will cause flicker and light pollution on local houses, and disturbance to habitats we have spent years protecting. Beyond the land itself, I am concerned that my family's ability to live and farm here, the way generations before us have, will be made very difficult, if not impossible.

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 only to connect the Cunlaghfadda Wind Farm (Ref. P26/60398, refused by Mayo County Council on 13/07/2026, now under appeal) to the grid, and a third project, a Battery Energy Storage System, has since been announced for the same site. Article 2(1) and Annex III of the EIA Directive (2011/92/EU, as amended by 2014/52/EU) require connected projects' cumulative effects to be assessed together, as confirmed in *Commission v Ireland* (C-392/96). This application should be decided together with the wind farm and BESS, as one project.

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. The applicant's assessment relies on desk-based research rather than proper survey. I have farmed this land for over seventy years and have always worked around the ring forts and fairy forts on our own land rather than clear them. A comparable enclosure at Kilbride, Co. Mayo, proved on excavation to be a Late Neolithic timber circle with Grooved Ware pottery dated to 3010–2470 cal BC, evidence that desk research alone cannot be trusted here.

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 and that development here would undermine the setting of Mayo Abbey. A permanent substation compound brings the same industrial impact into the same landscape, with the BESS confirming further expansion is already planned.

4. Ecology. As described above, I have spent years balancing farming with wildlife on this land. The site supports wintering Whooper Swan, Golden Plover and Snipe, and breeding Curlew, a Red-listed species; the ecological assessment relies on the outdated Bird Atlas 2007–2011 and undervalues declining species such as Meadow Pipit and Kestrel. The cutover bog, raised bog remnant and wet grassland here are amongst Ireland's most depleted habitats, protected under Article 6(3) of the Habitats Directive (92/43/EEC) and the EU Nature Restoration Regulation (2024/1991).

5. Water, drainage and flooding. Local road L-55362 already becomes flooded in heavy rain, and the enclosed map marks three locations I know 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. Foundations, hardstanding, cable trenches and drainage works risk making this worse and creating

pollution pathways to groundwater in this karst landscape, contrary to the Water Framework Directive (2000/60/EC). Once this infrastructure is built, there will be no opportunity to correct a mistake.

6. Noise, lighting and fire risk. The wind turbines connected to this substation will cause shadow flicker and light pollution affecting local houses, and the substation's own security lighting and transformer noise would add to that, in an area that is currently dark and quiet. The BESS, with fire-water tanks and an 18m lightning mast, means these effects should be assessed together, across all three connected developments.

7. Need for complete information. The unresolved archaeological status of this enclosure should not be left to conditions attached to a grant. An Coimisiún Pleanála needs full information, including proper survey results, before deciding whether this is a suitable site, 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. I reserve the right to elaborate on these grounds during the course of this application.

Yours faithfully,

Chris Flatley