

An Coimisiún Pleanála
64 Marlborough Street
DUBLIN 1

1st September 2026

Dear Sir / Madam

re: Proposed Development: 110kV Substation and Grid Connection
ACP Reference Number: VA16.324429
Applicant: Cunlaghfadda Green Energy Limited
Location: Townland of Cloonbaul, Co Mayo

Associated Live Applications:

- 1) Wind Farm: Mayo County Council (Refusal) Ref. 2660398
An Coimisiún Pleanála (Appeal) Ref. 501853
- 2) Battery Energy Storage System: Mayo County Council Ref. 2660653

Please find attached my formal observation on the above **110kV Substation and Grid Connection** Planning Application, reference no **VA16.324429**.

This is lodged directly against the 110kV Substation and Grid Connection application, while evaluating the overall cumulative threat posed by all three linked developments across this site.

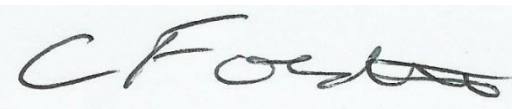
The rationale for this Substation collapsed when Mayo County Council refused planning permission for the associated Wind Farm (ref: 2660398; current appeal ref: 501853). Permitting a massive high voltage facility on land already established as incompatible with industrial energy infrastructure, where environmental, cultural, and residential harm cannot be mitigated, would be fundamentally flawed.

On these grounds, and for the full reasons outlined in the attached documentation, I request An Coimisiún Pleanála to reject this application in full

I hereby submit the prescribed statutory observation fee of €50.00.

My home address is noted below; please confirm receipt of this observation and keep me informed of all further correspondence regarding this application.

Yours faithfully



Christopher Foster

ADDRESS:

Knockaunakill, Mayo Abbey, Claremorris, Co Mayo

Table of Contents

1. Introduction and Purpose

- 1.1 Terminology
- 1.2 Three Connected Applications
- 1.3 Why a Combined Assessment Is Needed
- 1.4 My Home and Personal Circumstances

2. Planning Background and Policy

- 2.1 Mayo County Council's Refusal of the Wind Farm
- 2.2 Climate Policy and Site-Specific Planning
- 2.3 Renewable Energy Strategy (RES); Misinterpretation of 'Open for Consideration'
- 2.4 Development Plan Protections
- 2.5 Outdated Wind Energy Guidelines
- 2.6 Private Investment and Planning Considerations
- 2.7 Strategic Planning and the Concentration of Infrastructure

3. One Overall Development, Not Three Standalone Projects

- 3.1 Project Splitting
- 3.2 Consequences of Approving Components Separately

4. THE WIND FARM

- 4.1 Scale, Layout, and Operational Effects

5. THE 110KV SUBSTATION AND GRID INFRASTRUCTURE

- 5.1 Purpose of the Substation
- 5.2 Archaeological Enclosure
- 5.3 Heritage Surveys and the Monastic Setting
- 5.4 Scale, Alternative Sites, and Screening

6. THE BATTERY ENERGY STORAGE SYSTEM

- 6.1 Purpose, Capacity, and Scale
- 6.2 Relationship to the Wind Farm and Substation
- 6.3 Fire, Explosion, and Toxic Gas Risk
- 6.4 Continuous Noise
- 6.5 Peatland, Drainage, and Hardstanding

7. Flooding, Drainage, Peat, and Water

- 7.1 Existing Flooding
- 7.2 Loss of Peatland and Increased Runoff
- 7.3 Flooding and Emergency Access
- 7.4 Peat Stability and Landslide Risk
- 7.5 Private Wells and Groundwater
- 7.6 Drainage Design and the Precautionary Principle
- 7.7 Peat Carbon Loss
- 7.8 Carbon Payback Calculations

8. Fire Safety and Emergency Response

- 8.1 Combined Fire Hazards

9. Residential Amenity and Health

- 9.1 Overall Change to Living Conditions
- 9.2 Wind Turbine Noise
- 9.3 Substation and Battery Energy Storage System Noise
- 9.4 Limitations of the Baseline Noise Assessment
- 9.5 Noise Standards and Guidance

- 9.6 Shadow Flicker
- 9.7 Curtailment and Energy Yield
- 9.8 Compliance and Enforcement

10. Landscape and Visual Impact

- 10.1 Scale in the Rural Landscape
- 10.2 Limitations of the Photomontage Assessment
- 10.3 Omission and Selection of Representative Viewpoints

11. Mayo Abbey and Archaeological Heritage

- 11.1 Importance of Mayo Abbey
- 11.2 The Wider Historic Setting
- 11.3 Recorded Archaeological Enclosure
- 11.4 Heritage and Ecology as One Landscape
- 11.5 Applying the Precautionary Principle to Heritage

12. Ecology and Biodiversity

- 12.1 Birds 12.2 Bats
- 12.3 Marsh Fritillary
- 12.4 Streams, Lakes, Karst, and Aquatic Species
- 12.5 Japanese Knotweed
- 12.6 Limitations of Ecological Surveys
- 12.7 Appropriate Assessment and Scientific Certainty

13. Construction Traffic and the Haul Route

- 13.1 Suitability of the Road Network
- 13.2 Walls, Hedgerows, Trees, and Rural Character
- 13.3 Road and Bridge Capacity
- 13.4 Road Safety and Night-Time Deliveries

14. Property, Land, and the Future of the Community

- 14.1 Loss of Residential Amenity and Marketability
- 14.2 The Applicant's Property Value Evidence
- 14.3 Irish Research and Professional Evidence
- 14.4 Market Blight
- 14.5 Effects on Family Land and Future Housing
- 14.6 Employment and Community-Benefit Claims

15. Review of the Applicant's Assessment

- 15.1 Repeated Use of 'Slight', 'Negligible', and 'Insignificant'

16. Overall Reasons for Refusal

- 16.1 One Industrial Energy Facility
- 16.2 Unresolved Risks and Missing Evidence
- 16.3 Better Suited Locations
- 16.4 Main Grounds for Refusal

17. Formal Request

- 17.1 Request to Refuse Permission

18. Appendices

- 18.1 Appendix List
 - Appendix 01: Photographs - Local Flooding; Knockaunakill / Cloonbaul
 - Appendix 02: Photographs – Site Reality vs. Developer Screening Claims
 - Appendix 03: Original Wind Farm Objection

1. Introduction and Purpose

1.1 Terminology

- Please note, for the purposes of this submission references to **"the decision maker/planning authority"** refer individually or collectively to An Coimisiún Pleanála and/or Mayo County Council, as context requires for the specific application or cumulative assessment under consideration.

1.2 Three Connected Applications

- As stated in my accompanying cover letter, while this observation document evaluates the cumulative impacts of the overall industrial energy facility comprising the 3 applications outlined below, it is formally lodged for assessment today in direct connection with the specific planning application identified in my covering letter.

7 Turbine Wind Farm: currently under appeal to An Coimisiún Pleanála - ref no. 501853

110kV Substation (SID): currently before An Coimisiún Pleanála - ref no. 324429

Battery Energy Storage System: currently before Mayo County Council - ref no. 2660653

- I have found it necessary to prepare this consolidated observation addressing the 3 current live applications in view of the following:
 - All 3 applications represent a single, industrial energy facility, proposed at the same location by the same private developer.
 - The individual elements (Wind Farm / Substation / Battery Energy Storage System) are physically interconnected infrastructure.
 - Planning principles require assessment of combined environmental, landscape, and residential impacts of an entire project rather than considering elements in isolation.
 - Time constraints resulting from the simultaneous processing of 3 major, highly complex applications within an overlapping statutory observation return window (01 September – 17 September 2026) has imposed an unprecedented review burden on impacted residents and the wider public. Evaluating thousands of pages of technical data across 3 interrelated applications within such a condensed period has necessitated this consolidated response.
- I therefore respectfully request the decision maker/planning authority to **assess this observation document within the collective, functional context of the 3 inextricably linked energy applications** submitted by the same developer across the same site in Mayo Abbey.

1.3 Why a Combined Assessment Is Needed

- A consolidated assessment of these 3 applications is required based on the following:
 - These applications are not standalone proposals. Together, they form a single, integrated, industrial scale energy development where no individual component is operationally or commercially viable on its own.
 - Under EU Directive 2011/92/EU (as amended) and established Irish case law (O’Grianna v. An Bord Pleanála 2014 IEHC 632), piecemeal assessment of interdependent development components is prohibited.
 - While the Environmental Impact Assessment Report (EIAR) submitted for the Wind Farm and Substation is identical, it **fails to integrate** the full operational, hazard, and environmental footprint of the co-located Battery Energy Storage System. Assessing any element in isolation directly circumvents the primary objective of the EIA Directive.

1.4 My Home and Personal Circumstances

- As a direct neighbour to the proposed site (or as the applicant defines my family home “**Sensitive Receptor H060**”), I object in the strongest terms to the inappropriate location, excessive scale, layout, and piecemeal presentation of this overall industrial development.
- I support Ireland’s transition toward renewable energy, but true sustainability cannot be achieved by sacrificing the health, safety, and residential amenity of rural communities, nor by damaging local ecology and irreplaceable archaeological and cultural heritage, such as that of Mayo Abbey.
- Mayo County Council’s previous refusal of the Wind Farm remains a critical material planning consideration. Neither the Substation nor the Battery Energy Storage System can be justified as independent utility projects when their sole function is to facilitate the refused Wind Farm.
- Taken together, these proposals would irreversibly transform the agricultural townlands of Mayo Abbey into a heavy industrial energy facility.
- These applications fail to satisfy statutory requirements regarding site hydrology, technical completeness and residential protection, in material contravention of the Mayo County Development Plan 2022-2028.

2. Planning Background and Policy

2.1 Mayo County Council's Refusal of the Wind Farm

- Mayo County Council explicitly determined in its refusal decision (Planner’s Report) that “**the assessment on the landscape and visual as presented in Chapter 13 of the EIAR significantly understates the likely real significant impact of the proposed development on the landscape**”.
- Where local residents’ observations directly align with the formal refusal findings of the local authority, An Coimisiún Pleanála should not accept this private developer’s prejudiced and artificially sanitised visual renderings.
- I fully endorse Mayo County Council’s refusal determination. The local authority rightly recognised that the visual dominance and cultural heritage degradation inflicted by this development are **fundamentally unmitigable**. The applicant's appeal fails to offer any substantive spatial or visual modifications capable of resolving these core defects, therefore the planning authority’s expert finding stands fully intact and should be upheld to protect proper planning and sustainable development.

2.2 Climate Policy and Site Specific Planning

- The applicant relies on a misinterpretation of Section 15(1) of the Climate Action and Low Carbon Development Act 2015, claiming national climate targets should grant default planning justification to these developments in an attempt to replace site specific planning criteria with broad national rhetoric.
- This "climate override" logic was explicitly rejected by the Supreme Court in Coolglass Wind Farm Limited v. An Coimisiún Pleanála 2026 IESC 5 which confirmed that Section 15(1) does not create an automatic green light for renewables, confer new development rights, or override mandatory duties to evaluate site specific environmental damage, peatland instability, water contamination, and residential amenity loss.
- Across all 3 projects, the applicant leans assertively on **apocalyptic rhetoric** and **alarmist crisis scenarios**, attempting to lay the entirety of the State’s decarbonisation obligations at the feet of Mayo Abbey. Claiming that refusal will precipitate climate failure or trigger State non-

compliance penalties is a distortion of Irish planning law and statutory Environmental Impact Assessment principles.

- High-level national climate strategies do not operate as a blank cheque for inappropriate development. Climate action policy demands the right development in the right location; it does not grant statutory immunity to poorly sited, environmentally unsound projects on sensitive peatlands and historic, archaeologically rich environments like Mayo Abbey.
- The applicant's insistence that refusing permission will trigger systemic energy failure or place the State in breach of its climate obligations is factually unfounded. According to Mayo County Council's updated Renewable Energy Strategy (adopted 13 July 2026), County Mayo has already **exceeded** its statutory renewable energy target of 600MW set out in Objective REO 23 of the Development Plan.
- County Mayo currently has over 1,114MW of combined connected, permitted, or pending renewable capacity (as of July 2026) and **ranks among the top seven** counties nationally, producing over 6.8% of Ireland's total renewable energy output.
- Refusing an overdeveloped, improperly sited proposal adjacent to the historic landscape of Mayo Abbey and sensitive peatland catchments does not impede the State's green transition or Mayo's statutory contribution; it upholds the fundamental principle that renewable infrastructure must be environmentally sustainable and safely sited.

2.3 Renewable Energy Strategy (RES); Misinterpretation of 'Open for Consideration'

- The applicant fundamentally misinterprets planning policy and high level RES spatial mapping by treating an 'Open for Consideration' designation as an **automatic entitlement** to planning permission. This designation merely indicates that an area is worthy of consideration; it neither guarantees approval, overrides Mayo County Council's refusal, nor exempts the developer from demonstrating micro-level site suitability.
- Under the established principle of "the right project in the right place," strategic macro-zoning remains strictly subordinate to micro-level environmental, hydrological, archaeological, and residential constraints. Broad lines on strategic maps cannot neutralise statutory duties to protect local ecology, sub-surface hydrology, and residential communities.

2.4 Development Plan Protections

- Even within designated renewable zones, the Mayo County Development Plan mandates overriding protection for Recorded Monuments, Architectural Conservation Areas, and their wider landscape settings against visually obtrusive or dominant industrial developments. Statutory protection under National Monuments legislation and the Planning and Development Act 2000 extends directly to the visual context and landscape catchment of the Mayo Abbey monastic site (Mayo of the Saxons), taking legal precedence over broad RES spatial indications.
- The Development Plan explicitly mandates that new energy developments must not cause an unacceptable loss of residential amenity. Siting 160 metre turbines within **643 metres** of the nearest dwelling and placing **51 properties** within 1km directly conflicts with these statutory protection objectives.
- The developer's reliance on complex SCADA automated shutdown protocols to manage persistent shadow flicker breaches across at least 40 homes proves that the site is inherently unsuitable for the scale of infrastructure proposed.

2.5 Outdated Wind Energy Guidelines

- The environmental and physical assessments rely on the statutory 2006 Wind Energy Development Guidelines; a 20 year old framework drafted for 50 metre turbines that is fundamentally unfit for evaluating modern 160 metre structures.
- Applying obsolete baseline noise, shadow flicker, and spatial separation criteria to structures more than triple the height contemplated in 2006 represents a failure of statutory planning oversight.

- The 2006 guidelines established a default 500 metre buffer for 50 metre turbines, reflecting a 1:10 height to setback ratio. Applying that same protective principle to 160 metre turbines logically requires a 1.6km setback; siting these industrial structures just 643 metres from homes would force residents to endure visual dominance, low frequency noise, and shadow flicker far exceeding anything anticipated in 2006.
- Proceeding under these obsolete criteria ignores the State's ongoing finalisation of updated statutory guidelines (National Planning Statement on Wind Energy) designed to remedy known statutory failures regarding mandatory scale proportional setbacks, updated low frequency noise standards, and absolute shadow flicker prohibitions on residential properties. Granting permission under obsolete 2006 standards would inflict **irreversible injury** on local residential amenities.

2.6 Private Investment and Planning Considerations

- The developer's argument that upholding Mayo County Council's refusal would create commercial uncertainty and damage investor confidence should carry zero legal weight before An Coimisiún Pleanála.
- Under Section 37 of the Planning and Development Act 2000, planning applications must be evaluated strictly against proper planning and sustainable development principles.
- Developer expenditure, land option commitments, speculative investments, and private investor expectations are **not material planning considerations**. Developers commit capital at their own commercial risk; planning permission is never a guaranteed right or an underwriting of private equity.

2.7 Strategic Planning and the Concentration of Infrastructure

- The broader debate among Mayo County Councillors highlights a fundamental planning principle; rural communities must not be forced to absorb a disproportionate concentration of heavy industrial infrastructure in an uncoordinated, project-by-project manner.
- Contrary to the applicant's assertions, national renewable targets cannot substitute for rigorous, site specific suitability; the planning system exists to determine where heavy utility infrastructure is genuinely appropriate before speculative, investment led developments place unfair pressure on settled rural areas. A general policy desire for green energy cannot substitute for rigorous, and appropriate, site selection.
- Strategic energy planning must prioritise County Mayo's offshore renewable potential and properly designated utility zones, rather than continually encroaching on sensitive onshore agricultural and historical landscapes.
- Public representatives across Ireland are urgently calling for a **moratorium** on uncoordinated wind, solar, and substation developments, warning against the "reckless industrialisation" of rural landscapes while obsolete statutory guidelines remain in force.
- This project is driven by speculative profit, looking to impose heavy industrial utility infrastructure into a historic, culturally and archaeologically sensitive rural environment, regardless of genuine site suitability.
- The proposals lack genuine community support, relying on picking off individual landowners through private commercial deals rather than engaging in transparent, democratically accountable spatial planning.
- Energy planning must move away from aggressive, private speculation and return to democratically guided frameworks that prioritise the public interest, proper spatial planning, and the protection of settled rural communities.
- Forcing multi component energy complexes, combining wind turbines, high voltage substations, and battery storage, into un-serviced rural areas creates **severe cumulative blight**, violating core statutory principles of sustainable development and landscape protection.

3. One Overall Development, Not Three Standalone Projects

3.1 Project Splitting

- Dividing a single, integrated industrial energy facility into 3 separate statutory applications (7 Turbine Wind Farm / 110kV Substation / Battery Energy Storage System) is impermissible project splitting designed to obscure total environmental effects.
- Neither the Substation nor the BESS exists in an economic or operational vacuum; their sole purpose is to service, store, and export power from the refused Wind Farm. Approving ancillary infrastructure built to facilitate a rejected primary development creates an illogical and legally vulnerable planning outcome.
- An EIAR must assess the whole project. Presenting piecemeal documentation that omits the full operational, hazard, and construction footprint of the co-located BESS renders the environmental assessment incomplete, legally flawed, and in direct breach of EU environmental law.

3.2 Consequences of Approving Components Separately

- Granting planning permission for a standalone 110kV Substation prior to securing valid planning consent for the refused Wind Farm violates basic planning and sustainable development principles.
- If the Wind Farm appeal is refused, approving the Substation would leave a redundant, high voltage industrial compound on open agricultural land serving no operational purpose.
- Approving heavy utility infrastructure in isolation sets a dangerous precedent, effectively pre-zoning rural agricultural land for heavy industrial utility use before a primary generation project has cleared statutory hurdles.

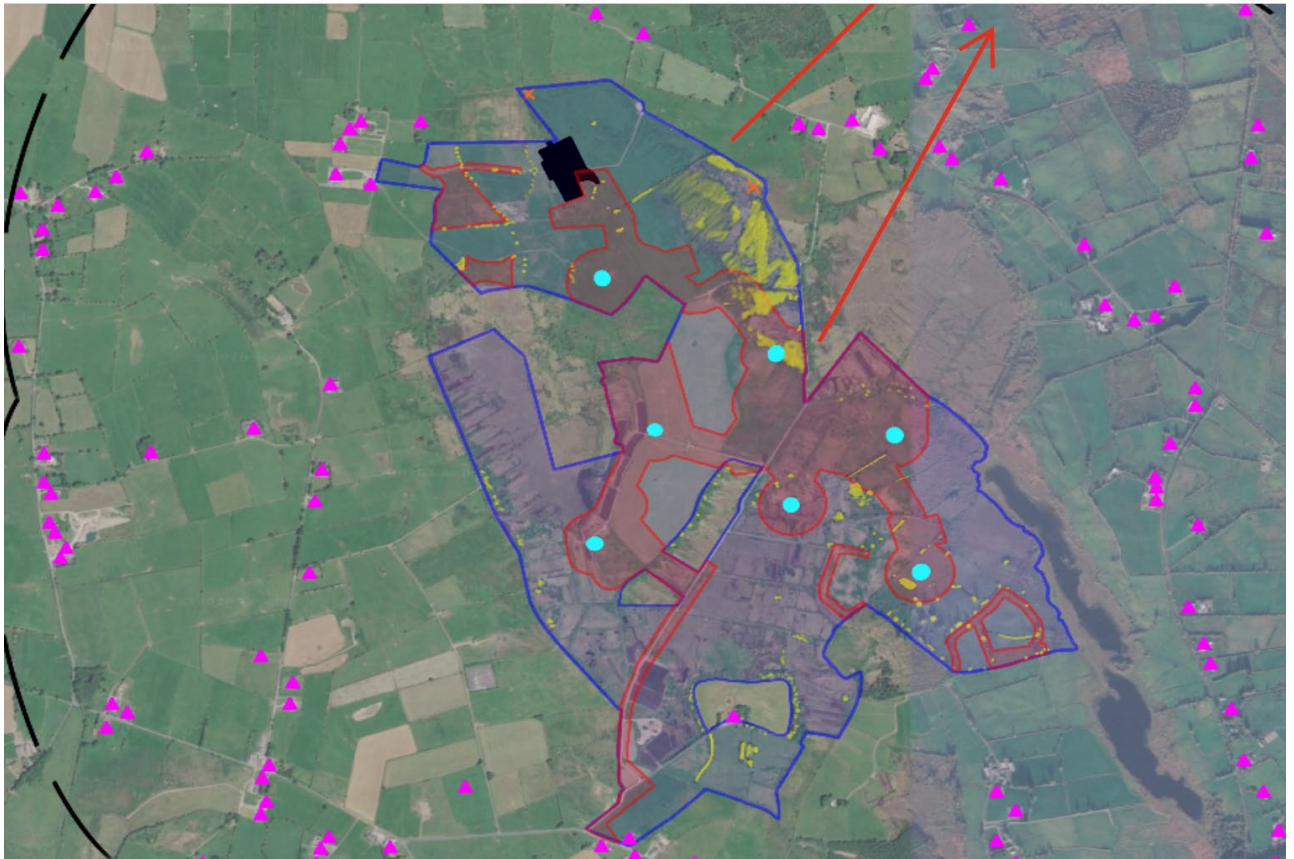
4. THE WIND FARM

4.1 Scale, Layout, and Operational Effects

- My original observation submitted to Mayo County Council on 22 June 2026 regarding the refused Wind Farm application is attached at Appendix 03, and forms and **integral part** of this submission.
- Mayo County Council's decisive ruling (reference no. 2660398) to refuse planning permission for the Wind Farm represents a sound, evidence based determination grounded in the principles of proper planning and sustainable development.
- In their First Party Appeal, the applicant adopts a remarkably dismissive tone, treating Mayo County Council's expert planning reports, local environmental knowledge, and statutory authority with thinly veiled disdain. Simply rejecting the Council's grounds and undermining the professional judgment of the local authority does not satisfy the statutory burden of proof required on appeal.
- The First Party Appeal introduces no new substantive spatial or environmental evidence capable of overcoming the fundamental planning, environmental, and cultural conflicts inherent in inserting 160 metre industrial turbines into this low lying, sensitive rural landscape; the local authority's refusal grounds remain fully intact and should be upheld.
- These 160 metre turbines are industrial structures of exceptional scale. Their combined height, blade motion, aviation lighting, access tracks, heavy foundations, and internal cabling would permanently alter and degrade the local landscape character.
- The applicant's reliance on a **few insignificant parcels of temporary commercial forestry** for visual mitigation is absurd. As shown in the applicant's own submission drawings (Figure 3-2 Site Boundary), the site's commercial forestry is largely temporary, clear-felled, or severely

blown down; even intact 20 to 25-metre trees can obviously never screen 160 metre turbines, the 3.2 acre substation compound, or the adjoining Battery Energy Storage System facility.

- The applicant's reliance on heavy mitigation, including shadow flicker and noise curtailment, does not prove site suitability. Requiring extensive technological controls to make a development even allegedly tolerable to over 50 dwellings is clear proof that it is located far too close to an established residential community.



FORESTRY SCREENING: Note all forestry across entire site is highlighted YELLOW

These tiny areas comprise the applicant's justification for 7 x 160m turbines on the basis that they will be "screened" from local residents by this existing forestry



This is the sole parcel of forestry on the site of any significance – this recent aerial confirms very little remains, it has been largely cleared through harvesting and/or storm damage

5. THE 110KV SUBSTATION AND GRID INFRASTRUCTURE

5.1 Purpose of the Substation

- The proposed 110kV Substation cannot be evaluated in isolation; an energy generation facility and its grid connection infrastructure constitute a single, indivisible project for the purposes of Environmental Impact Assessment.
- The Substation is designed to serve a 7 turbine Wind Farm that was refused planning permission by Mayo County Council. In the absence of an approved Wind Farm, the Substation possesses zero independent functional planning justification.

- The 110kV Substation is grossly oversized for a 7 turbine Wind Farm. This over-specification strongly suggests it is intended as a central master hub for future expansion phases or additional grid connections.
- Approving infrastructure that far exceeds immediate operational requirements undermines the Environmental Impact Assessment process by masking the true scale and cumulative impact of the overall development.

5.2 Archaeological Enclosure

- The proposed Substation compound directly overlaps and encroaches upon a recorded archaeological enclosure identified in the 1995 Mayo Abbey Archaeological Survey as a feature of "immense importance."
- Potentially prehistoric or Neolithic in origin, the enclosure holds structural evidence capable of fundamentally revising our understanding of early human settlement around Mayo Abbey.
- The lack of surface visibility does not negate archaeological presence; there is a strong likelihood of further unrecorded features beneath these fields that require comprehensive precautionary evaluation.
- For a monument of this significance, **preservation in situ** must be the baseline principle. Archaeological excavation under planning condition is fundamentally permanent physical destruction, it records damage rather than preserving the asset, resulting in irreversible heritage loss.

5.3 Heritage Surveys and the Monastic Setting

- Relying on desk based research and visual inspection is wholly inadequate to determine the subterranean extent, date, or internal features of this buried complex.
- Comprehensive non-invasive geophysical surveying, detailed topographical mapping, and expert micro-assessment across the full impact area must be required prior to making any planning decision.
- This enclosure forms part of an ancient, integrated landscape physically and visually linked to Mayo Abbey, historic pilgrim routeways, satellite enclosures, and elevated ridgelines; placing a massive industrial footprint directly within it destroys the contextual integrity of its wider historic setting.

5.4 Scale, Alternative Sites, and Screening

- The physical scale of the 110kV Substation compound is entirely disproportionate to a 7 turbine Wind Farm. Occupying a 3.2 acre footprint with two control buildings, gantries, 24 hour lighting, two 16m end masts, lightning masts, and a 36m telecommunications tower, it clearly signals an unstated intent to establish a high capacity regional utility hub.
- There is no evidence that the applicant rigorously evaluated alternative, lower sensitivity land parcels, leaving statutory obligations regarding alternative site selection unsatisfied.
- Proposed perimeter screening and landscaping are wholly insufficient to neutralise the visual and physical impact of this compound in an open, pastoral setting. Evaluated alongside the Wind Farm and the co-located Battery Energy Storage System, this represents the uncoordinated, cumulative industrialisation of a rural residential community.

6. THE BATTERY ENERGY STORAGE SYSTEM

6.1 Purpose, Capacity, and Scale

- Though presented as an ancillary facility for the 31.5MW Wind Farm, the physical and electrical scale of the proposed Battery Energy Storage System reveals it to be a mega scale national grid asset designed as a regional energy hub.

- Allowing large scale infrastructure to proceed without declaring its true operational intent is procedurally invalid, depriving both the planning authority and the public of the opportunity to evaluate the true scope and potential hazards of the installation.

6.2 Relationship to the Wind Farm and Substation

- Lodging a standalone Battery Energy Storage System application while the primary generation source remains unapproved and under active appeal represents piecemeal planning and a tactic to incrementally convert land to industrial use.
- Under the EU EIA Directive and established Irish High Court case law, the Wind Farm, 110kV Substation, and Battery Energy Storage System are intrinsically linked components of a single industrial masterplan that cannot be evaluated in isolation.
- Advancing this Battery Facility as a separate development constitutes clear project splitting designed to bypass comprehensive cumulative assessment; it cannot be assessed in a planning vacuum while the primary generation project stands refused.

6.3 Fire, Explosion, and Toxic Gas Risk

- Utility scale Battery Energy Storage Systems introduce severe chemical and technological hazards incompatible with a rural setting, including thermal runaway and self-sustaining chemical fires that release lethal gases such as hydrogen fluoride.
- **Siting a high hazard battery compound in an area with pre-existing, severe flooding vulnerabilities creates a dangerous, compounding risk.** Increased hardstanding will aggravate surface water runoff, making local access routes impassable during predictable flood events.
- In the event of a catastrophic battery fire occurring during local flooding, emergency services would be physically blocked from accessing the site, leaving nearby residents marooned downwind, exposed to toxic fumes, and cut off from emergency evacuation, creating an unacceptable risk to human life.
- Under the EU Precautionary Principle, generic developer assurances cannot replace a fully costed, site specific Emergency Response Plan. The developer has failed to prove that rural fire services are equipped for an industrial chemical fire, or that sufficient firefighting water supplies, chemical containment, and safety distances can be maintained.
- Permitting a high hazard installation in a flood prone area with known emergency access vulnerabilities would constitute an unacceptable risk to human life and directly violates basic principles of public safety and proper planning.

6.4 Continuous Noise

- A Battery Energy Storage System generates a continuous, 24/7 noise. The continuous operation of industrial HVAC cooling units, power inverters, and high voltage transformers creates a persistent low frequency hum and vibration.
- In the tranquil nighttime environment of Cloonbaul and adjacent Knockaunakill, where baseline ambient noise levels are exceptionally low, continuous low frequency noise would penetrate homes causing sleep disturbance and **permanent loss of residential amenity.**

6.5 Peatland, Drainage, and Hardstanding

- Inserting a heavy utility compound, comprising battery containers, inverters, transformers, security fencing, and extensive hardstanding, permanently destroys the environmental carrying capacity of the local landscape.
- Cloonbaul and the adjacent Knockaunakill townlands are characterised by low lying topography, sensitive peat soils, and complex surface drainage networks vulnerable to extreme localised flooding. Replacing natural peatland and pasture with extensive impermeable foundations increases surface runoff surges, directly exacerbating flooding downstream.

- This Battery Energy Storage System application represents an unacceptable attempt to construct a heavy regional energy hub in a sensitive, rural residential area through creeping, piecemeal development.

7. Flooding, Drainage, Peat, and Water

7.1 Existing Flooding

- The EIAR Flood Risk Assessment relies on broad regional OPW mapping and desktop models that completely fail to capture local hydraulic bottlenecks and actual site flood vulnerability.
- The site and surrounding local roads suffer **regular extreme flooding** ignored by these desktop models; severe flooding routinely leaves the entire community cut off for days, rendering all main access routes to Knockaunakill and Cloonbaul impassable for cars (supported by photographic evidence at Appendix 01).
- Because these townlands are low lying with high water tables and already overloaded drainage networks, relying on computer models that ignore well documented local flood events makes the environmental assessment fundamentally unreliable.

7.2 Loss of Peatland and Increased Runoff

- Intact peatland functions as a vital natural sponge, absorbing, holding, and slowly releasing large volumes of rainfall across the landscape.
- The overall development requires extensive excavation, stripping, and compaction of intact peatland to construct 7 turbine foundations, massive crane hardstandings, 3.2-acre footprint substation, a large Battery Energy Storage System compound, cable trenches, and kilometres of stone access roads.
- Replacing thousands of square metres of naturally absorbent peat with impermeable concrete and crushed stone will drastically increase surface runoff, instantly flushing rainfall into overloaded local streams and drainage channels and directly exacerbating flooding on adjacent local access roads during heavy rain.

7.3 Flooding and Emergency Access

- Utility scale Battery Energy Storage Systems introduce severe chemical and technological hazards incompatible with a rural setting, specifically thermal runaway and self-sustaining chemical fires releasing highly toxic gases like hydrogen fluoride that standard firefighting techniques cannot extinguish.
- Placing a high hazard Battery Energy Storage System in an area with pre-existing severe flood vulnerabilities creates a **catastrophic, compounded risk**. Extensive civil works and new impermeable surfaces will exacerbate surface water runoff, worsening the recurring and extreme flooding that already leaves local roads impassable.
- **In the event of a thermal runaway or chemical fire during flooding, Mayo Fire and Rescue Services would be physically blocked from reaching the facility or surrounding homes. Residents in Knockaunakill, Cloonbaul, and neighbouring townlands would face the direct threat of being marooned downwind of an uncontrollable toxic fire without access to emergency support or evacuation, representing an unacceptable risk to human life.**
- The proposed access roads across the site will act as dams across natural bogland drainage pathways, blocking normal groundwater flow and funnelling heavy runoff straight toward existing roadside bottlenecks. Worsening local flood levels, heightening traffic hazards, and compromising emergency service access directly violates core statutory principles of public safety and proper planning.

7.4 Peat Stability and Landslide Risk

- Siting heavy development on sensitive peatland where stability depends entirely on local hydrology carries severe geotechnical risks, as demonstrated by major peat slide disasters at other energy sites, such as Meenbog, Co Donegal.
- Does the submitted Peat Stability Assessment meet the official requirements set out in the Guidelines on the Protection of Peatland Habitats and the Engineers Ireland standards for evaluating peat stability?
- Is there sufficient evidence regarding the actual depth and strength of the peat exactly where the turbines, hardstandings, and access roads would sit?
- Heavy digging, deep piling, and structural weight during construction could easily trigger peat slides or bog bursts. Any such failure would cause catastrophic environmental damage, destroy downstream habitats, and heavily pollute local waterways with sediment.

7.5 Private Wells and Groundwater

- Many homes and farms across the proposed development site rely on private bored wells for their drinking water.
- Deep foundation digging, piling, trenching, storing heavy fuels / chemicals, and pouring massive amounts of concrete, pose an immediate threat of polluting underlying groundwater sources.
- Excavation works would alter natural groundwater flow, risking "dewatering" the surrounding bog. The resulting runoff would send heavy sediment into local watercourses, breaching water protection standards. My home has a bored private well and I would be very concerned that these works would disrupt the water table or contaminate my supply. I can find no detail within the applicant's application documentation regarding the well on my property "Sensitive Receptor H060".

7.6 Drainage Design and the Precautionary Principle

- Is the applicant's proposed Sustainable Drainage System sufficient for saturated peatlands?
- During severe winter rainstorms, when the water table rises to the surface and surrounding roads are actively flooding, holding ponds constructed in saturated peat offer virtually zero additional storage capacity.
- Under official flood management guidelines and EU law, the decision maker must apply the Precautionary Principle; if an applicant fails to prove that a development will not worsen flooding on public roads, compromise drinking water, or trigger peat slides, permission must be refused. The applicant has clearly failed to satisfy the fundamental "Do No Significant Harm" test required for sustainable development.

7.7 Peat Carbon Loss

- The applicant claims that this project makes a net positive contribution to national climate targets, however does this account for the massive carbon penalty incurred by disturbing an active, natural carbon sink?
- The 165 hectare site contains deep peat soils that store vast amounts of carbon; excavating and draining thousands of tonnes of ancient peat for 7 turbine foundations, crane pads, floating roads, and drainage will destroy this natural sink and release centuries of stored carbon dioxide as the peat degrades.
- Construction creates an immense upfront carbon debt through heavy concrete foundations, deep piling, steel rebar, site clearing, two years of HGV transport, composite blade manufacturing, and the extensive civil works required for the 3.2-acre substation and Battery facility.

- Siting heavy industrial utility infrastructure on an active carbon sink is fundamentally counterproductive, inflicting severe, immediate environmental damage in exchange for uncertain long term carbon gains.

7.8 Carbon Payback Calculations

- Is the EIAR relying on idealised assumptions to claim an unrealistically short carbon payback time of up to 3 years, failing to prove beyond scientific doubt a net positive carbon balance once peat disturbance, embodied concrete, and grid buildout are fully accounted for?
- Carbon payback calculations falsely assume new generation displaces high carbon coal or oil; because Ireland's grid relies primarily on gas for marginal generation, the applicant's displacement figures may be inflated to artificially shrink the payback timeline.
- Peat carbon loss is grossly underestimated by evaluating physical footprints alone; deep foundations and drainage ditches lower the surrounding water table across a 50 to 100 metre radius, causing continuous peat drying, cracking, and carbon release for the full 35 year lifespan of the facility.
- Does the carbon accounting include the massive embodied carbon footprint involved in manufacturing, shipping, assembling, and maintaining the Battery Energy Storage System battery units, 110kV Substation, and grid connection hardware?
- By underestimating drainage impacts, miscalculating grid displacement, and ignoring major infrastructure carbon costs, the EIAR may rely on speculative mitigation and fail to provide the definitive environmental assessment required under EU Directives.

8. Fire Safety and Emergency Response

8.1 Combined Fire Hazards

- The site consists of large areas of dry peatland, commercial forestry, and dense scrub; environments with a **history of local gorse and wildfires**, as evidenced in several of the 170 plus objections submitted to Mayo County Council on the proposed Wind Farm.
- High voltage 110kV Substation transformers, a massive Battery Energy Storage System carrying overheating risks, and 160m wind turbines with mechanical gearboxes, would introduce severe new fire risks to this peatland environment.
- The EIAR relies on generic fire safety statements. Is the decision maker/planning authority satisfied that the applicant has provided a proper, site specific Emergency Response Plan covering peat fires, toxic smoke, water supply availability for firefighters, or safe evacuation routes along narrow, flood prone roads?

9. Residential Amenity and Health

9.1 Overall Change to Living Conditions

- The 3 interdependent energy developments introduce massive industrial infrastructure into an established inhabited rural environment defined by open views and low background noise levels.
- The Wind Farm appeal application directly impacts over 50 residential homes. The scale, proximity, and layout of the 7 160m turbines, combined with the Battery Energy Storage System and 110kV Substation, represent excessive industrialisation. The applicant's environmental assessments attempt to reduce residential amenity to single, indoor mathematical coordinates on window models. Under established planning principles,

residential amenity extends across the entire outdoor curtilage of a home, including gardens, farmyards, private amenity spaces, and the immediate landscape used for everyday rural living. Mitigating shadow flicker or noise at a single indoor point does not protect the use and enjoyment of a residential property as a whole.

9.2 Wind Turbine Noise

- The 3 interconnected energy projects threaten an irreversible transformation of the local soundscape, moving from an exceptionally quiet rural baseline to an industrial environment characterised by aerodynamic turbine noise, low frequency amplitude modulation, transformer hum, and continuous Battery Energy Storage System HVAC / inverter operational noise.
- The massive volumes of air displaced by 160m turbines generate aerodynamic modulation and low frequency noise; unlike continuous, uniform industrial noise (i.e., road or rail traffic), this is recognised by acoustic research (including findings from the Netherlands Institute for Public Health and the Environment), as significantly more intrusive at equivalent decibel levels.
- Low frequency sound travels long distances with minimal loss of strength and easily penetrates double glazed windows, causing indoor acoustic resonance and ear pressure.
- Undisturbed sleep is a core statutory component of residential amenity and human health. The continuous, inescapable nature of this noise, particularly during night-time hours, poses a severe risk of sleep disruption, chronic stress, and associated physiological and psychological distress. The destruction of this natural quiet setting would directly threaten my health, quality of life, and the peaceful enjoyment of my home.

9.3 Substation and Battery Energy Storage System Noise

- The acoustic impact on my home ("Sensitive Receptor H060"), is not limited to wind turbine operation. My home would face combined noise from multiple sources.
- My home is located just 695 metres from the proposed 3.2 acre 110kV Substation compound and 570 metres from the nearest 16 metre end grid mast, with seven 160m turbines surrounding the locality.
- Continuous low frequency tonal humming from transformers within the 110kV Substation, combined with incessant inverter and cooling fan noise from the adjacent Battery Energy Storage System, would create a continuous acoustic burden.
- The local climate is dominated by South / South-Westerly prevailing winds. Positioned downwind of the turbines, my home would experience heightened exposure to wind amplified noise.

9.4 Limitations of the Baseline Noise Assessment

- I have concerns regarding the integrity of the applicant's Background Noise Survey, which I believe to be fundamentally flawed due to **strategic monitor placement**, inadequate sampling, and distorted baseline data collection across the site:
- The background noise monitor for Knockaunakill ("Loc B") was placed at the far opposite boundary of the village loop road. The placement of this monitor also just so happens to be the location of 'Monaghan Bros Hospitality Furniture', a busy live active industrial factory operating heavy machinery, sawing and woodworking throughout the day. This factory is the sole commercial noise source in the entire rural area. To utilise this single industrial noise source to establish the baseline for exceptionally quiet rural areas at the opposite end of the Knockaunakill loop is **fundamentally misleading**. By measuring an artificially inflated background noise level at the factory boundary, the applicant has created a false, elevated baseline that artificially masks the true impact.
- Despite the site spanning 165 hectares, the applicant utilised only 5 monitoring locations (A to E). Zero baseline monitoring stations were placed near Sensitive Receptor H060 **or across the entire Northern section of the site**. Because the Northern section sits directly downwind

under prevailing South Westerly winds, omitting monitoring in these areas has concealed the highest operational noise impacts.

9.5 Noise Standards and Guidance

- The applicant's Noise Impact Assessment relies on the outdated 2006 Wind Energy Development Guidelines, a framework acknowledged as **unfit for purpose** when evaluating modern, mega scale 160m turbines.
- **The Department of Housing, Local Government and Heritage is currently finalising a high level statutory revision of these Guidelines, specifically introducing stricter noise limits, mandatory low frequency noise assessment protocols, expanded setback distances, and a concurrent Strategic Environmental Assessment.**
- The applicant acknowledges operating in a **regulatory grey area** while the Institute of Acoustics and Government departments update these standards, suggesting that future regulatory changes can simply be managed via standard planning conditions. This proposition is legally and methodologically unsound.
- An industrial project of this magnitude cannot be granted permission based on obsolete 2006 standards with an expectation that acoustic compliance will be retrofitted later. Adjudicating this application prior to the enactment of revised statutory guidelines pre-empts the outcome of the Strategic Environment Assessment and locks in an irreversible, non-compliant acoustic footprint.
- The assessment evaluates operational noise in isolation, failing to combine operational turbine noise, 110kV Substation tonal emissions together with Battery Energy Storage System cooling / inverter noise. By analysing noise sources in isolation under obsolete thresholds, the applicant fails to present an evidence based mitigation strategy capable of protecting residential amenity.

9.6 Shadow Flicker

- The applicant's EIAR submitted for the Wind Farm appeal identifies **57 residential properties exposed to shadow flicker, with at least 40 homes predicted to exceed statutory daily exposure thresholds** prior to mitigation. This proves that the Wind Farm is being placed in the middle of an established, populated rural community.
- Rapid weather changes could frequently outpace light sensors mounted on top of the turbines. Technical failures, dirty or degraded sensors, system delays, would leave residents exposed to harsh shadow strobing long before alleged automated shutdown controls could react. Forcing dozens of households to live under the constant threat of technical glitches or software delays would severely damage local quality of life. Exposure to harsh, pulsating light strobing across our living spaces would cause stress and sleep disruption, again robbing residents of the peaceful enjoyment of our homes.
- Relying on automatic shut-off software places an unfair monitoring burden on local residents. The onus is on the residents to log, prove, and report shadow flicker breaches in any attempt to get developer compliance enforced.
- Ultimately, the requirement for extreme, continuous mitigation measures, which still cannot guarantee complete protection against shadow flicker, **proves that this site is fundamentally unsuitable** for industrial wind turbines.
- Statutory mitigation is intended to fully resolve an environmental impact; relying on technological controls to manage an ongoing, residual nuisance does not fix a fundamental site selection failure. **Where an impact cannot be reliably or completely eliminated, the only proper and effective mitigation is to refuse planning permission.**

9.7 Curtailment and Energy Yield

- To rely on frequent turbine shutdowns creates a direct conflict between the developer's alleged energy output and the environmental protections needed for local homes.

- The developer's power predictions and carbon offset claims assume the turbines will run almost continuously. However, enforcing mandatory SCADA shutdowns across more than 40 affected homes during peak solar hours would force frequent turbine curtailments, directly reducing energy output and presumably invalidating projected yield calculations?
- To prevent shadow flicker breaches across 40+ homes situated at varying compass angles, multiple turbines will require frequent operational shutdowns during bright, clear weather, precisely during periods of peak operational potential.
- Is the decision maker/planning authority satisfied that the applicant has factored the cumulative generation loss resulting from these mandatory shutdowns into their annual yield, capacity factor, or carbon payback calculations?

9.8 Compliance and Enforcement

- National planning policy under the Draft Revised Wind Energy Guidelines (2019) moves away from outdated 2006 limits (30 minutes per day or 30 hours per year) in favour of a strict zero shadow flicker policy at residential properties.
- Forcing an entire community to rely on automatic computer shut-offs in an attempt to control widespread shadow flicker proves the Wind Farm is entirely unsuited to this area, failing to provide safe separation distances from homes.
- Approving a Wind Farm that inherently depends on complex technical mitigations in an attempt to protect basic living conditions, goes directly against sound planning principles.

10. Landscape and Visual Impact

10.1 Scale in the Rural Landscape

- The proposed Wind Farm would introduce seven 160 metre tall turbines into an inhabited, low lying rural neighbourhood. The sheer scale of these structures is completely out of proportion with the surrounding single, and occasional two storey, homes (just 6m – 9m in height).
- For homes within 1km of the Wind Farm, the massive sweeping blades would dominate the view in every direction, creating a constant, overbearing, and claustrophobic presence. This impact goes far beyond what this particular rural landscape can naturally absorb, turning this rural agricultural environment into a major electrical industrial zone.
- The visual impact of the turbines would be exacerbated by the 3.2 acre 110kV Substation, 36 metre telecom tower, two 16 metre grid masts, and Battery Energy Storage System facility.
- The applicant's own EIAR admits there is "increased potential for permanent landscape and visual impact," with regard to the addition of two new mast structures and the larger footprint of the 110kV Substation in addition to the Wind Farm (and this was prior to the introduction of the Battery Energy Storage System compound).

10.2 Limitations of the Photomontage Assessment

- I firmly believe the Landscape and Visual Impact Assessment (LVIA) within the EIAR submitted for the Wind Farm fundamentally misrepresents the actual visual scale and dominance of the Wind Turbines.
- The report relies on wide angle panoramic photos. This technique flattens the horizon, making the 160 metre turbines look smaller and less noticeable. Official guidelines state that assessment photos must be taken from standard adult eye level (1.5 to 1.7 metres). I find it hard to believe that this was adhered to. For example, the single photomontage provided for Knockaunakill indicates that the camera was set up well below this height, using local walls and roadside growth to artificially mask the visual impact of the turbines.

- It is highly significant that across the 170+ Third Party submissions lodged to Mayo County Council against the Wind Farm application, the misleading and inaccurate nature of the applicant's photomontages emerged as a regular concern. As local residents, who live in and know this landscape, our voice should be heard that the visuals within the applicant's LVIA have **understated** the true scale, massing, and visual dominance of the proposed development.
- Further compounding this visual misrepresentation is the omission of photomontages taken from or adjacent to identified "Sensitive Receptors". **The applicant's EIAR explicitly categorises our residential properties as designated "Sensitive Receptors" yet, having formally acknowledged our vulnerability to visual and environmental impacts, they then fail to provide the planning authority/decision maker with photomontages taken from these high sensitivity locations.**
- Labelling a home as a Sensitive Receptor while withholding visual evidence of the true impact from that location is further evidence of commercial developer bias, a concerted strategy to obscure the true visual dominance of these massive structures from decision makers.
- Omitting critical visual data from primary Sensitive Receptors prevents the planning authority from executing its statutory EIA duties, depriving decision makers of the objective data needed to evaluate impacts on residential amenity and human health.
- Computer generated photomontages produced by external consultants cannot replace local geographical knowledge; the sheer height and scale of these structures will dominate the open rural landscape to a degree completely unreflected in the application files.
- EIA obligations require environmental information to be robust, objective, and accurate. The submitted visual assessment exhibits clear selective bias, and relying on flawed photomontages would severely undermine the legitimacy of the planning process.

10.3 Omission and Selection of Representative Viewpoints

- Having lived in Knockaunakill village for over 20 years, I have firsthand knowledge of the local area. Photomontage imagery provided within an EIAR must accurately reflect visual dominance on Sensitive Receptors across all surrounding areas. I believe the applicant has engaged in **selective sampling** to conceal the true severity of visual impact.
- The sole photomontage provided for Knockaunakill village is taken from the furthest Eastern boundary of the Knockaunakill loop road. I live on the far opposite side of the loop and can confirm that an image from the Eastern boundary is **unrepresentative** of the visual dominance that would be inflicted on properties at the opposing end. Homes along the Western side also sit at higher, direct elevations with zero intervening topography or screening, and would face the full visual massing of the turbines, 3.2-acre Substation and adjacent Battery Energy Storage System facility.
- The applicant has completely **omitted** photomontage assessments for the townland of Cloonbaul and the adjacent townland of Knockroe, both of which are within the immediate, high impact visual zone of the proposed developments. Leaving these areas unassessed represents an unacceptable deficiency in the EIAR landscape and visual baseline.
- An EIAR must evaluate the genuine worst case environmental and visual impact on Sensitive Receptors. By deliberately omitting the most exposed residential vantage points along the Western side of Knockaunakill, as well as entire adjacent townlands such as Cloonbaul and Knockroe, I believe the applicant has presented a prejudiced, incomplete, and legally flawed visual baseline, invalidating the LVIA visual impact conclusions.

11. Mayo Abbey and Archaeological Heritage

11.1 Importance of Mayo Abbey

- The introduction of an industrial scale utility development, comprising seven 160m tall wind turbines, a 3.2 acre 110kV Substation compound, and a large Battery Energy Storage System compound into the immediate landscape setting of Mayo Abbey represents an **unacceptable, irreversible degradation of a heritage asset of international historical and cultural significance**.
- Mayo Abbey is a 7th century monastic foundation established by St Colmán of Lindisfarne around AD 668 for Saxon monks ("Mayo of the Saxons"). It is a designated Recorded Monument of extraordinary national and European historical weight, serving as the foundational ecclesiastical settlement from which County Mayo derives its name.
- The turbines would overpower the historic horizon, introducing dominant industrial forms into the direct sightlines of this ancient monastic complex.
- The applicant incorrectly treats Recorded Monuments as isolated points on a map, arguing that visual impacts can be absorbed or dismissed. Cultural heritage must be evaluated across the integrated historical landscape, encompassing topography, ancient field boundaries, historic pilgrim routes, medieval settlement patterns, and open ridgelines.
- **Mayo Abbey attracts international historians, pilgrims, and cultural tourists. Transforming its serene, rural setting into a high-density industrial energy hub would destroy the authentic historical landscape, severely undermining local heritage tourism, community amenity, and educational resource value.**

11.2 The Wider Historic Setting

- Under national heritage guidelines, the Architectural Heritage Protection Guidelines for Planning Authorities, and the Mayo County Development Plan, statutory heritage protection is not limited to the physical footprint of a recorded monument or protected structure, it explicitly **extends to the visual envelope, setting, and historical context**.
- The spatial integrity of an ancient ecclesiastical settlement relies entirely on its surrounding landscape context; the open, rural townlands that have maintained an unbroken historical scale for centuries. Modern 160m tall turbines would create an aggressive visual conflict with this sensitive landscape, catastrophically damaging the historic setting.
- Continuous rotation, night-time aviation lighting and the prominent industrial silhouette of these massive structures would undermine the contemplative quality and spiritual integrity of this 7th century monastic landscape.
- Mayo County Council's statutory policies explicitly mandate that renewable energy targets must be balanced against the protection of landscape, archaeological, cultural, and built heritage resources. Support for green energy cannot be treated as a presumption in favour of development where severe, unmitigable injury to protected historic settings will result.

11.3 Recorded Archaeological Enclosure

- As noted earlier, the overall development directly threatens a recorded archaeological enclosure identified in the 1995 Mayo Abbey Archaeological Survey as an asset of "immense importance." Digging up or disturbing untouched ground to build energy infrastructure directly breaks heritage protection policies.

11.4 Heritage and Ecology as One Landscape

- The rural landscape surrounding Mayo Abbey cannot be evaluated in isolation; it is an interwoven ecosystem where historical setting, rural residential amenity, and sensitive ecological receptors coexist.

- The application site townlands that frame the setting of Mayo Abbey serve as established habitats for critically endangered, Annex listed species, including potentially breeding Curlew, the Marsh Fritillary butterfly, and the Lesser Horseshoe Bat.
- Earthworks, deep concrete foundations, peat drainage, shadow flicker, and continuous low frequency noise would alter the hydrogeological and ecological systems supporting these protected species while also degrading the visual setting of Mayo Abbey. Industrialising this land would destroy both the cultural heritage and the biodiversity foundation of this rural community.

11.5 Applying the Precautionary Principle to Heritage

- I believe the decision maker/planning authority is bound by statutory planning principles to protect sensitive landscape character, heritage assets, and residential amenity from incompatible industrial development.
- Under the provisions of the Planning and Development Act 2000 permission should be refused where a development causes severe injury to the visual amenities of the area, interferes with recorded monuments and their settings, or depreciates the value of property and residential amenity in the locality.
- In accordance with European environmental law and the Precautionary Principle, where an industrial proposal presents unmitigated risks of irreversible damage to international cultural heritage assets, sensitive groundwater aquifers, and red listed protected species, the planning authority must act to prevent ecological and cultural loss.

12. Ecology and Biodiversity

12.1 Birds

- The 165 hectare site and surrounding countryside are home to active feeding, hunting, and breeding grounds for many protected bird species and native birds of prey.
- As a local resident of Knockaunakill, I regularly see Kestrels, Sparrowhawks, and Buzzards hunting across the site and surrounding fields. Hen Harrier (Annex I of the EU Birds Directive) activity has also been recorded in the local area. The impact of seven 160 metre tall wind turbines into these established flight and hunting corridors would create a continuous, severe risk of bird collisions.
- The applicant's own ecological surveys confirmed probable breeding Curlew within the site; a species currently on Ireland's red list of Birds of Conservation Concern and facing national extinction.
- Beyond direct blade strikes, ongoing operational noise, moving shadows and shadow flicker will inevitably drive wildlife away. Sensitive breeding pairs will be forced out of their traditional nesting and feeding areas, breaching the protection rules under the EU Birds Directive (2009/147/EC).

12.2 Bats

- The proposed location is a confirmed stronghold for several bat species, including the Lesser Horseshoe Bat, which is protected under Annex II and Annex IV of the EU Habitats Directive (92/43/EEC).
- The applicant's own survey confirms a bat roost inside the site boundary, along with multiple protected bat species using local hedgerows, stone walls and tree lines.
- 160m turbines would be catastrophic for these bats, through direct blade strikes and barotrauma.

- Extensive clearing of native hedgerows, treelines, and earth banks to widen existing access and build new access within the site, would destroy the essential commuting routes these bats rely on.
- Developer mitigation suggests tackling these risks post-operation, by slowing or turning off blades at certain times. Is the decision maker/planning authority permitted to grant planning permission on the promise of post-consent trial mitigation or experimental curtailment schedules?

12.3 Marsh Fritillary

- The development footprint directly overlaps with confirmed colonies of the Marsh Fritillary butterfly; the only insect in Ireland protected under Annex II of the EU Habitats Directive.
- The applicant's documentation highlights the Marsh Fritillary caterpillar webs across at least 41 potential breeding areas. Is the decision maker/planning authority satisfied that the survey provides sufficiently detailed, multi-season mapping to show the true size and boundaries of these protected colonies?
- Devil's Bit Scabious (the Marsh Fritillary's host plant) relies on specific underground water flows and high water tables. Deep digging, drainage ditches, and pouring concrete foundations will disrupt underground water, drying out these plants and destroying the host plant network.
- Building access gravel tracks, crane pads, cable trenches, and a 3.2-acre Substation directly cuts through the delicate caterpillar habitat, directly threatening the survival of this Annex II species.

12.4 Streams, Lakes, Karst, and Aquatic Species

- The proposed site connects directly to local streams, lakes, and underground limestone water pathways that support protected aquatic life.
- Local streams and connected lakes, including Drumady Lake, are vital habitats for the White Clawed Crayfish (Annex II) and the European Eel (critically endangered). Heavy ground clearance, peat digging, and pouring concrete would create severe risk of heavy silt run-off and chemical pollution entering these sensitive waters.
- Lough Fark is very close to the proposed site. Sediment research from this lake provides crucial historical baseline data on the environmental and settlement history of Mayo Abbey. The applicant's EIAR overlooks Lough Fark's water catchment and historic landscape value. This is a major gap in their assessment.
- The underlying geology features limestone and karst, known for fast, unpredictable underground streams, swallow holes, and springs. As mentioned earlier, my home in Knockaunakill has a private bored well, as do many neighbouring properties. Deep foundation piling, fuel / chemical storage, and concrete washout pose an unmitigated threat of polluting underground drinking water sources.

12.5 Japanese Knotweed

- A serious environmental risk across the site is the documented presence of Japanese Knotweed, an extremely invasive plant species.
- Under EU Regulation it is an offence to plant, disperse, allow, or cause the spread of Japanese Knotweed.
- The overall energy project requires massive ground disturbance, including deep excavations for seven turbine bases, 3.2 acres for the Substation, Battery Energy Storage System compounds, and miles of cable trenches. Digging through infested soil would chop up the root system, where a microscopic fragment can grow into a new infestation.
- Over an approximate 2 year construction period, involving thousands of truck movements, mud and root fragments stuck to tyres and machinery will inevitably spread this aggressive

weed onto public roads, farmland, neighbouring properties and private gardens, causing severe long term structural and environmental damage to our community.

12.6 Limitations of Ecological Surveys

- The applicant claims their EIAR gives a complete, accurate picture of the wildlife on this site. However that is simply not credible. **This site spans 165 hectares of heavy bogland, deep water filled drains, wet ditches, and thick hedgerows. No ecological survey, no matter how detailed it claims to be, could ever properly count or track all the protected Annex I (birds) and Annex II (wildlife) species living across a site of this size and rough terrain.**
- Traversing 165 hectares of waterlogged ground, overgrown ditches, and thick hedgerows means vast areas are physically impossible to inspect thoroughly. Shy, nocturnal, or seasonal species would absolutely be missed during brief site visits.
- Animals and birds do not sit still for surveyors. A few snapshot visits across a massive, overgrown site cannot tell the planning authority/decision maker what actually uses these drains, hedgerows, and bogs across different seasons and weather conditions.
- I also note that the applicant used an **outdated publication** to determine the ecological value / status of bird species (Bird Atlas 2007-2011); this is arguably insufficient given that many species would have declined in the intervening 15 years.
- Planning law requires certainty; under Irish and EU environmental law, decisions on protected wildlife cannot be based on guesswork or incomplete sampling. Leaving massive blind spots across a 165 hectare bog violates the Precautionary Principle, which states that where there is doubt about environmental damage, permission must be refused.
- The planning authority/decision maker cannot rely on these surveys as a true or complete representation of the wildlife at risk on this land.

12.7 Appropriate Assessment and Scientific Certainty

- Where a project requires Appropriate Assessment, planning authorities must meet strict standards regarding scientific certainty.
- Established EU legal precedents (Waddenzee ruling) and Irish court decisions (Kelly v. An Bord Pleanála) mandate that permission can only be granted if decision makers are certain beyond reasonable scientific doubt that the project will not adversely affect protected species or habitats.
- I believe the applicant has repeatedly relied on future monitoring, unverified habitat management plans, and post-planning protocols to deal with major uncertainties around bat roosts, Curlew displacement, peat run-off, and water pollution. Pushing key environmental assessments off into post-planning management plans is not permitted under EU law.

13. Construction Traffic and the Haul Route

13.1 Suitability of the Road Network

- The applicant's Transport and Delivery Route Plan provides clear evidence that the proposed site is located in an un-serviced rural area fundamentally unsuited to utility scale industrial energy development.
- When an applicant has to carry out invasive civil engineering works miles beyond the site boundary simply to render public roads physically passable, the transport strategy ceases to be a passive logistics exercise and becomes a severe, material planning impact in its own right.
- The necessity for extraordinary off site intervention to deliver 160m turbine components (blades, tower sections, Substation transformers, and Battery Energy Storage System containers, etc.,) demonstrates that the proposed overall energy development represents a

massive over development of an un-serviced rural landscape whose receiving local road network (L-roads) lacks the baseline spatial, structural, and environmental carrying capacity.

- A site that requires the physical dismantling and night-time disruption of surrounding rural townlands between the primary road network and the site boundary merely to achieve physical access is, in my opinion, an improperly sited and fundamentally unsustainable development.

13.2 Walls, Hedgerows, Trees, and Rural Character

- The applicant acknowledges that delivering abnormal loads requires invasive engineering works along the full extent of the access route. These proposed works will inflict irreversible physical and visual damage on the historic rural transport corridor.
- The route plan requires the widespread removal, demolition, and setback of ancient drystone walls, historic field boundaries, and roadside stone features. These elements represent centuries of rural agricultural heritage and form the visual character of local rural villages and townlands.
- Roadside treelines and mature native hedgerows along the 'transport corridor' serve as critical biological corridors, in particular for the Lesser Horseshoe Bat. The proposed widespread tree felling, hedgerow stripping, and corner clearing will cause severe linear habitat fragmentation. I believe the EIAR severely understates the cumulative ecological loss resulting from these extensive off-site clearance works.
- Obliterating established roadside landscape elements to accommodate temporary construction access directly **contravenes the policies and objectives of the Mayo County Development Plan** regarding the preservation of rural character, natural heritage, field boundaries, and local landscape sensitivity.

13.3 Road and Bridge Capacity

- The local rural road network was never designed or constructed to sustain repeated passes of super heavy industrial machinery.
- Is the decision maker/planning authority satisfied that the applicant has provided complete, verified engineering assessments proving that the underlying road foundations, minor culverts, and historic bridges along the delivery route possess the structural loadbearing capacity to withstand repeated heavy goods vehicle movements and abnormal industrial loads without suffering catastrophic structural failure or sub-surface subsidence?
- Numerous historic and traditional rural dwellings are situated immediately adjacent to the narrow edge along the proposed transport corridor. The movement of massive turbine components and aggregate HGVs presents an unmitigated risk of vibration, threatening structural cracking, foundation displacement, and masonry failure in older residential properties.
- Has the applicant provided a binding, comprehensive commitment to complete rigorous pre-construction structural condition surveys and provide legally guaranteed indemnification for homeowners along the entire transport route?

13.4 Road Safety and Night-Time Deliveries

- The approximate two year construction phase will dump thousands of HGV movements onto narrow, unlit country lanes, creating an acute threat to public safety and human health.
- The local L-road network is heavily utilised by local residents, agricultural vehicles, cyclists, and pedestrians. Introducing HGV traffic and oversized convoys onto roads that lack footpaths, public lighting, and adequate passing bays would create severe traffic hazards and threaten road users, particularly school children.
- To minimise daytime traffic gridlock, the applicant proposes high-impact, night-time heavy convoy operations. Running abnormal load deliveries, escort vehicles, temporary lighting rigs,

and road clearing operations at night represents a huge disruption to human health, quiet enjoyment, and residential amenity across dozens of family homes lining the haul corridor.

- The proposed temporary dismantling of overhead electricity and telecommunications wires, street lighting, and public signage to allow blade clearance would result in repeated utility outages and localised access restrictions for residents along the route.

14. Property, Land, and the Future of the Community

14.1 Loss of Residential Amenity and Marketability

- Under Irish planning law and the principles of proper spatial planning and sustainable development, property devaluation is not evaluated in a vacuum as a pure commercial loss. Rather, it is recognised as the direct measurable result of severe statutory planning injuries inflicted upon residential amenity.
- Under Section 37 of the Planning and Development Act 2000 and the mandatory Residential Amenity Protection Objectives of the Mayo County Development Plan, planning authorities are legally bound to protect the living conditions, health, and peaceful occupation of settled rural communities.
- The permanent stripping of a home's peacefulness, rural outlook, and acoustic tranquillity through the insertion of 160m high industrial turbines, 3.2-acre 110kV Substation, and Battery Energy Storage System cluster facility, directly reduces property amenity. Where a development inflicts acute visual overbearing, shadow flicker exposure across up to 51 residential dwellings, continuous low frequency noise, heavy industrial hazards, light pollution, and flood runoff risks, the resulting collapse in property value and marketability constitutes a severe, unmitigated injury to residential amenity.

14.2 The Applicant's Property Value Evidence

- The applicant acknowledges that the proposed developments will have a direct negative impact on residential property values up to a 2km radius of the site. However, the applicant then **arbitrarily dismisses** this risk for local residents, labelling their own cited -14.7% impact as merely "slight," "short-term," or "insignificant."
- To downplay this conceded devaluation, the applicant relies on property market studies from **Scotland and the United States**. Foreign property markets, characterised by vastly different land density, housing typologies, and geography, have zero relevance to the realities of settled rural Ireland. **Utilising irrelevant foreign data to trivialise the guaranteed financial loss of Mayo residents is a distortion of factual planning realities.**
- The applicant asserts that property value impacts may be "short term". This claim is entirely speculative and unprovable. The proposed operational lifespan of this utility facility is 35 years, a duration spanning an entire generation. Furthermore, operational wind energy hubs are rarely decommissioned; "decommissioning" at year 35 almost invariably consists of repowering applications for larger turbines. **A 35 plus year industrial imposition is permanent, not short-term.**
- The applicant acknowledges that property devaluations may be far more substantial than -14.7%, yet improperly proceeds to urge the decision maker to **disregard these losses on the grounds that the number of homes affected is small relative to national energy goals**. Sacrificing the residential amenity, equity, and constitutional property rights of a local community to serve the commercial interests of this private developer is fundamentally wrong and incompatible with proper planning and sustainable development.

14.3 Irish Research and Professional Evidence

- Contrary to the applicant's speculative assertions, peer reviewed economic research and formal professional surveys published in Ireland within the past five years establish a clear link between onshore wind energy infrastructure and residential market blight:
- **Economic & Social Research Institute / Trinity College Dublin (2021-2022):** Research identified a significant negative price effect for properties within 2km of operational wind developments. The study confirmed pronounced "market friction" effect, where dwellings experienced extended listing durations, severe discounting, and reduced market liquidity.
- **Sustainable Energy Authority of Ireland, Socio-Economic Studies (2022):** Documented a sharp divergence between modelling and local property realities, confirming that subjective visual disruption, shadow flicker, and low frequency noise generate strong "buyer reluctance" up to 1.5km radius, triggering immediate "planning blight".
- **Society of Chartered Surveyors Ireland (SCSI) Market Guidance (2023-2024):** Chartered valuation surveyors across Ireland reported consistent localised market reluctance and discounting for residential property within shadow flicker corridors of **150m** turbines (10m less than those proposed in this overall development). Mortgage lenders frequently apply valuation buffers where high density energy infrastructure encroaches on residential curtilages.
- **Journal of Environmental Planning and Management (2023):** Research examining rural Irish property markets confirmed an immediate effect causing residential values within 1.5km of proposed wind farm boundaries to lag significantly behind regional price growth.

14.4 Market Blight

- The ultimate consequence of transforming a quiet agricultural area into a high density industrial utility zone is the creation of acute market blight.
- Devaluation in close proximity to 160m turbines, 110kV Substations and Battery Energy Storage System facilities, does not merely mean accepting a lower sales price, it results in **unsellability**. A home in a quiet rural area **derives its market value from its peacefulness, scenic outlook, and untainted residential amenity**. The proposed developments would permanently strip a rural property of its specific attributes. No potential buyer pays premium market value to live in the visual and acoustic shadow of an industrial scale Wind Farm, regional sized Substation and massive Battery Energy Storage System – effectively a sprawling industrial energy complex.
- As highlighted by SCSI, Irish financial institutions are extremely reluctant to issue residential mortgages against properties located in the vicinity of operational industrial mega turbines.
- The cumulative impacts of increased heavy traffic, low frequency hum, light pollution, noise and visual intrusion, fundamentally alter the character of a rural area, destroying quality of life.

14.5 Effects on Family Land and Future Housing

- The proposed overall development represents a long term threat to the viability of our rural community by effectively sterilising surrounding family owned land. Granting permission creates an invisible exclusion zone around nearby farmland and homes. Wind Farm developers regularly lodge planning objections against local residential applications to protect their own operational buffer zones. This will permanently block our adult children and elderly relatives from obtaining planning permission to build homes on family land.
- It is deeply unjust that a private developer can occupy a rural area and subsequently use their industrial presence to deny local families the right to live on their own property. Private commercial profit must not be granted veto power over the basic housing needs of the local community.

- The surrounding homes and lands will suffer catastrophic devaluation. Residents will be left unable to sell their homes, trapped living alongside an industrial energy facility, and unable to utilise their land for family needs.
- Rural communities rely on intergenerational living for elder care, childcare, and local social continuity. Blocking future generations from building on local land destroys these vital family support networks and would accelerate rural depopulation.
- A development that penalises existing local residents, sterilises surrounding agricultural land, and denies future generations the fundamental right to live in their home community, should not be permitted.

14.6 Employment and Community Benefit Claims

- The applicant's evaluation of the "Do Nothing Alternative" relies on misleading claims designed to exaggerate the long term community benefits of the project while glossing over the reality that the entire project creates virtually no ongoing local employment.
- The documentation states that the "Do Nothing Alternative" would result in a **loss of up to 100 potential jobs**. However, please note that this **(100) figure represents short term construction / engineering activities**, many of which would be filled by specialised external contractors rather than local personnel. Elsewhere in the documentation it is confirmed that, post-construction, the permanent operational workforce will consist of a **maximum of 2 positions, which are highly likely to be monitored and managed remotely**. A maximum of **2 remote operational** jobs provides zero meaningful employment or economic growth for our local community.
- It is entirely disproportionate to **weaponize temporary construction jobs to justify decades of permanent visual intrusion, health risks, structural noise, shadow flicker, and loss of residential property value** across our rural community.

15. Review of the Applicant's Assessment

15.1 Repeated Use of 'Slight', 'Negligible', and 'Insignificant'

- Throughout the EIAR and across all 3 associated applications, the developer engages in a pattern of **systematically downplaying** severe, long term impacts.
- Serious planning injuries, ranging from acute shadow flicker, acoustic disturbance, visual overbearing, peat instability risks, property devaluation (to name but a few), are **repeatedly dismissed** as "slight," "negligible," or "insignificant."
- This self-serving terminology is not an objective scientific finding; it is a **deliberate minimisation** of significant "Sensitive Receptor" and environmental harm.
- The developer's methodology relies on subjective claims and unproven mitigation promises to mask catastrophic impacts on biodiversity, cultural heritage, landscape integrity, and residential amenity.
- The developer also repeatedly urges the decision maker/planning authority to disregard severe, localised impacts on the basis that these impacts affect only a "small number" of Sensitive Receptors (residential homes) when weighed against national climate targets. **This argument fundamentally distorts Irish planning law.**
- The primary purpose of the planning system is to safeguard established communities, human health, and residential amenities. Severe harm inflicted upon a home, a family's quality of life, or a local environment **does not become acceptable or planning compliant** simply because the prejudiced opinion of a private developer **deems the affected residents a numerical minority**.

- The decision maker/planning authority should reject the proposition that local communities can be treated as acceptable collateral damage for private commercial energy development.
- The applicant's reliance on automated, complex operational curtailment regimes, specifically proposing to shut down turbines to manage shadow flicker breaches across up to 51 residential dwellings, is effectively an admission of **defective site selection**.
- The overall energy facility is clearly over concentrated, poorly sited, and incompatible with its receiving environment. Attempting to manage fundamental spatial conflicts through automated operational shut-offs is unworkable, unenforceable, and places an unacceptable monitoring burden on the impacted residents.
- When evaluated across the 3 interconnected applications, **the sheer volume of environmental, visual, historical, and safety impacts is overwhelming**. Yet, without exception, **every conflict is brushed aside** by the applicant's own evaluations as acceptable / negligible / minor or, at the very worst, moderate but temporary.
- This **systematic skewing of impact assessments deprives the decision maker/planning authority of a true evaluation of cumulative risk**. A development that requires the total discounting of local heritage, biodiversity, landscape character, and residential safety to appear viable is inherently unsustainable and should be refused.
- Throughout the 3 vast submissions, the applicant adopts a high moral tone of **environmental virtue-signalling**, presenting a commercial, profit driven venture as though it were a **public rescue mission**. The documentation is saturated with environmental rhetoric designed to distract from the severe local damage they are well aware these developments would cause. I ask the decision maker/planning authority to see past this corporate posturing; this is a speculative private energy enterprise, not a public service.
- Commercial profit cannot be rebranded as moral virtue to bypass basic planning standards.

16. Overall Reasons for Refusal

16.1 One Industrial Energy Facility

- The 3 interconnected proposals cannot be evaluated as an isolated, standalone Wind Farm. The cumulative impact of the overall energy hub is far greater than the sum of its individual planning components:
 - Exceptional height (160m), spatial movement, shadow flicker, and low frequency aerodynamic noise.
 - Permanent 3.2 acre industrial facility with high voltage electrical equipment, transformers, lighting columns, lightning mast, security fencing, 24 hour night lighting, 24 hour CCTV, two 16m end masts, 36m telecommunications tower and overhead grid infrastructure.
 - 10 industrial scale battery container clusters, a 33kV substation building, power inverters, industrial cooling plants, thermal runaway hazards, 18m lightning mast, and incessant background acoustic noise.
 - Extensive land take, native hedgerow clearance, ancient drystone wall demolition, street furniture removal, heavy construction traffic, and night-time convoy disruption.
- Combined, these elements would transform our rural townlands from the tranquil agricultural and historic landscape into a massive industrial energy facility.
- The decision maker/planning authority is legally required under European EIA Directives and national planning law to prevent project splitting. Assessing these interconnected elements within separate statutory envelopes creates an incomplete, distorted cumulative assessment. Approving an industrial utility zone by allowing its component parts to be permitted

sequentially is fundamentally contrary to the principles of proper planning and sustainable development.

16.2 Unresolved Risks and Missing Evidence

- Where major gaps in baseline evidence exist regarding hydrological volatility, underground peat stability, wildlife destruction and low frequency noise, the decision maker/planning authority is bound under EU law to apply the Precautionary Principle.
- The applicant has failed to supply solid baseline data in critical areas. Under EU law, when evidence is missing or uncertain regarding environmental risks, the decision maker/planning authority must take a precautionary approach rather than gambling on the local environment and community.
- Assessing modern 160 metre industrial turbines under the outdated Wind Energy Development Guidelines 2006 is completely inadequate. These 20 year old guidelines were written for vastly smaller, lower capacity turbines. Using obsolete rules to judge the visual, spatial, and acoustic impacts of today's mega-turbines leaves human health, local homes, biodiversity and cultural heritage dangerously unprotected.

16.3 Better Suited Locations

- While the need to hit national climate and renewable targets is clear, green energy cannot be used as an excuse for poor development. Renewable projects must still be properly located, environmentally responsible, and genuinely compatible with the local community.
- Vast swathes of non residential brownfield sites, and immense offshore wind resources exist across Ireland where energy generation can be accommodated without destroying settled rural communities.
- Placing a high density, utility scale industrial energy hub in immediate proximity to family homes subjects residents to a relentless spectrum of physical and cognitive stressors, including continuous noise, low frequency hum, shadow flicker, and constant anxiety over safety and property blight. Destroying the peace, health, and quiet enjoyment of local families to further the gains of a private developer is entirely disproportionate and unjustified.

16.4 Main Grounds for Refusal

- Planning permission for this entire 3 part industrial energy masterplan should be refused in full based on multiple planning conflicts:
 - **Impermissible Project Splitting:** Splitting a single, integrated industrial energy facility into three separate statutory applications (Wind Farm, 110kV Substation, BESS) directly violates EU EIA Directive 2011/92/EU and established Irish case law (O'Grianna v. An Bord Pleanála), obscuring total cumulative environmental effects.
 - **Archaeological & Cultural Heritage Damage:** Irreversible visual and spatial degradation of the international heritage setting of Mayo Abbey (7th century monastic foundation) and direct physical encroachment/destruction of a recorded archaeological enclosure of "immense importance" beneath the substation compound footprint.
 - **Public Safety Hazards & Compounded Fire/Flood Risk:** Siting a high hazard Battery Energy Storage System (thermal runaway, toxic hydrogen fluoride gas, uncontainable chemical fire) in an area subject to severe recurring flooding creates a catastrophic hazard scenario where floodwaters would block Mayo Fire & Rescue Services and leave residents marooned downwind without emergency evacuation routes.
 - **Hydrological Disruption & Increased Flooding:** Relying on desktop flood models that ignore documented local flood events, replacing absorbent peatland with extensive impermeable surfaces, and inserting road structures that act as dams, failing both the Precautionary Principle and the "Do No Significant Harm" test.

- **Geotechnical Instability & Peat Slide Hazard:** Heavy excavation, deep piling, and structural loading on sensitive, water dependent peatland risks triggering catastrophic bogslides or peat bursts, destroying downstream habitats and polluting waterways.
- **Ecological Damage to Protected Annex Species:** Unacceptable impact on Annex I birds (probable breeding Curlew, Hen Harrier) and Annex II species (Lesser Horseshoe Bat roosts/corridors, Marsh Fritillary butterfly colonies, White-Clawed Crayfish), while relying on impermissible post-consent trial mitigation in breach of strict Appropriate Assessment standards (Waddenzee, Kelly).
- **Severe Loss of Residential Amenity & Public Health Impacts:** Extreme visual overbearing, continuous low frequency noise (turbines, substation hum, BESS cooling systems), and excessive shadow flicker affecting over 40 homes, evaluated under obsolete 2006 Wind Energy Guidelines that fail modern height and scale reality.
- **Flawed Landscape & Visual Impact Assessment (LVIA):** Selective developer bias and statutory failure to provide objective EIA data, caused by using wide angle photography, low camera setups, and deliberately omitting photomontages from primary Sensitive Receptors and neighbouring townlands.
- **Net Carbon Loss & Destruction of Active Carbon Sink:** Siting industrial infrastructure on 165 hectares of active peatland destroys a natural carbon sink, releasing centuries of stored CO2 and generating a massive upfront embodied carbon debt that invalidates short carbon payback claims.
- **Inadequate Haul Route & Infrastructure Carrying Capacity:** Overdevelopment of narrow rural L-roads requiring destructive off-site interventions, including demolition of historic drystone walls, stripping of native roadside hedgerows (fragmenting bat corridors), and unproven structural load capacity of rural bridges.
- **Groundwater Disruption & Threat to Private Wells:** Piling, deep foundations, peat de-watering, concrete washout, and chemical storage over karst geology pose an unmitigated threat of polluting and disrupting local private drinking water supplies.
- **Property Market Blight & Community Sterilisation:** Creation of acute local planning blight (unsellable/un-mortgageable family homes) and invisible exclusion zones that sterilise surrounding agricultural land, preventing future generations from building homes on family land.

17. Formal Request

17.1 Request to Refuse Permission

- The aforesaid 3 applications are intrinsically linked. Evaluated either individually or cumulatively, each component fails to satisfy basic statutory planning, environmental, and residential protection standards.
- I therefore respectfully request that each respective planning authority/decision maker **refuse** planning permission for the specific application currently under its individual statutory consideration.

18. Appendices

18.1 Appendix List

- **APPENDIX 01:** Original Wind Farm objection, as submitted to Mayo County Council on 22 June 2026. Copied here to ensure that all original planning grounds remain fully before the decision maker/planning authority
- **APPENDIX 02** Photographs - Local Flooding; Knockaunakill / Cloonbaul
- **APPENDIX 03** Photographs - Site Reality vs. Developer Screening Claims

APPENDIX 01

Photographs - Local Flooding; Knockaunakill / Cloonbaul



Knockaunakill - December 2017



Kilbride / Cloonbaul – November 2023



Knockaunakill – January 2024



Cloonbaul / Kilbride – November 2024



Cloonbaul / Kilbride – November 2024



Knockaunakill – November 2024



Knockaunakill – November 2024





Knockaunakill - 2024





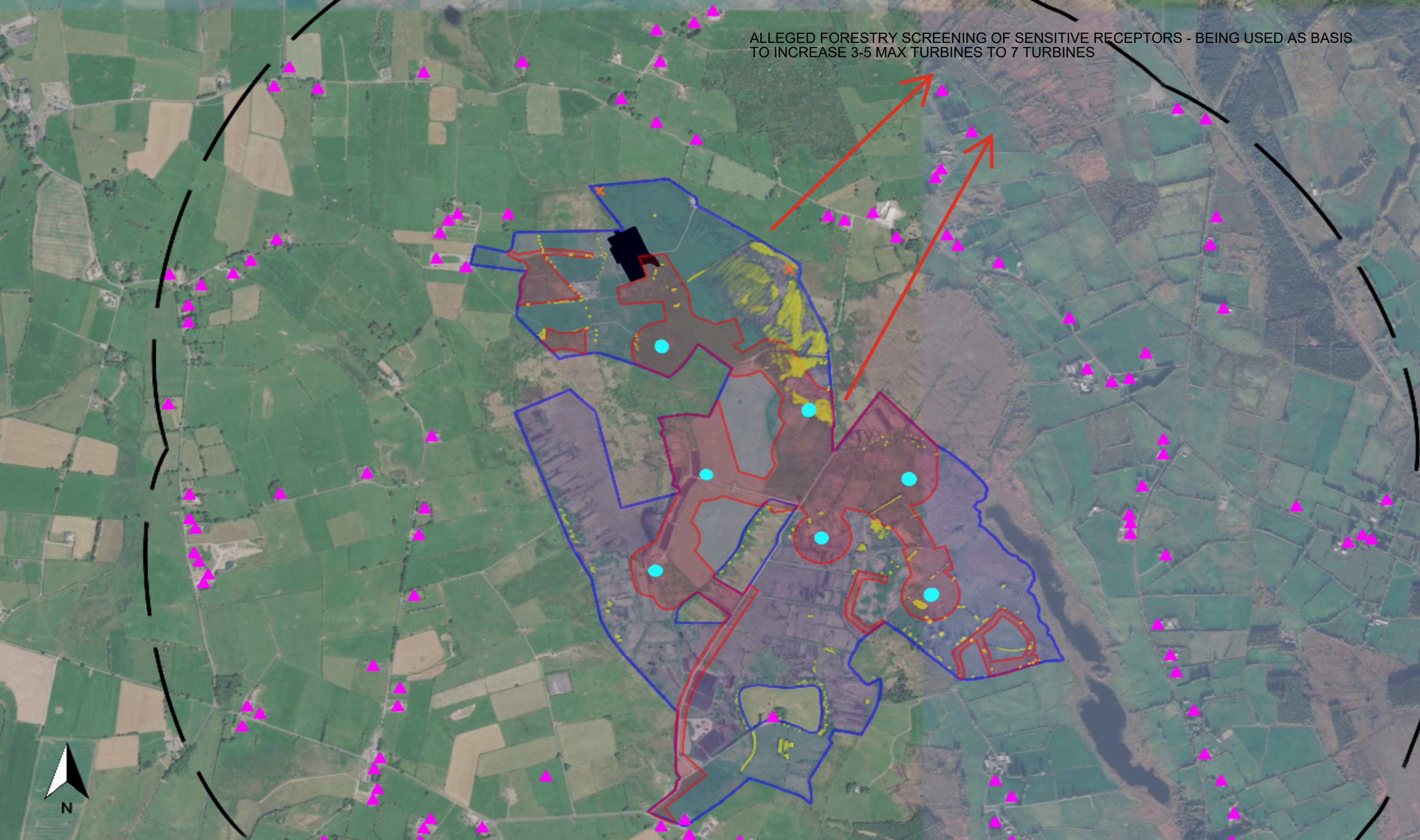
Knockaunakill - 2024



Knockaunakill – January 2024

APPENDIX 02

Photographs - Site Reality vs. Developer Screening Claims



- SITE BOUNDARY



- SENSITIVE RECEPTORS



- WIND TURBINE



- GRID MAST



- SITE INFRASTRUCTURE



- SUBSTATION



- FORESTRY



Knockaunakill – from West end of loop





Knockaunakill – from West end of loop





Knockaunakill – from West end of loop





SITE REALITY VS. APPLICANT'S SCREENING CLAIMS

Unscreened Panoramic View Towards Turbine Site





SITE REALITY VS. APPLICANT'S SCREENING CLAIMS

Unscreened Panoramic View Towards Turbine Site





SITE REALITY VS. APPLICANT'S SCREENING CLAIMS

Unscreened Panoramic View Towards Turbine Site





SITE REALITY VS. APPLICANT'S SCREENING CLAIMS

Unscreened Panoramic View Towards Turbine Site





SITE REALITY VS. APPLICANT'S SCREENING CLAIMS

Unscreened Panoramic View Towards Turbine Site





SITE REALITY VS. APPLICANT'S SCREENING CLAIMS
Unscreened Panoramic View Towards Turbine Site





SITE REALITY VS. APPLICANT'S SCREENING CLAIMS

Unscreened Panoramic View Towards Turbine Site





SITE REALITY VS. APPLICANT'S SCREENING CLAIMS

Unscreened Panoramic View Towards Turbine Site





SITE REALITY VS. APPLICANT'S SCREENING CLAIMS

Unscreened Panoramic View Towards Turbine Site





SITE REALITY VS. APPLICANT'S SCREENING CLAIMS

Unscreened Panoramic View Towards Turbine Site

APPENDIX 03

Original Wind Farm Objection



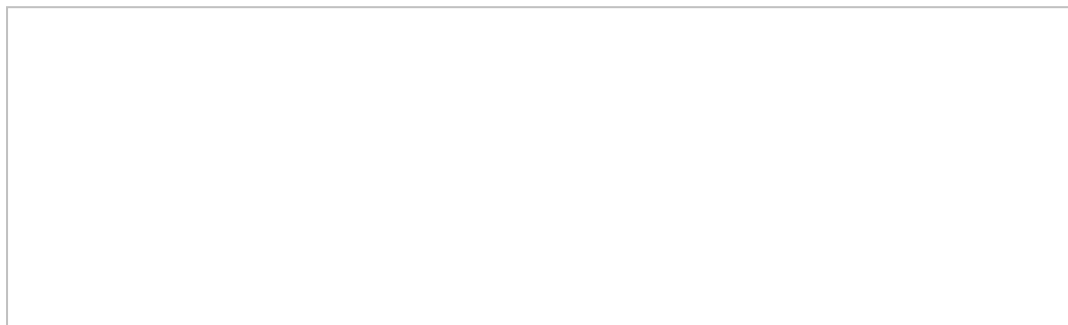
Chris Foster <c.foster454@gmail.com>

Acknowledgement of receipt of submission on a planning application

1 message

OnlinePlanning <onlineplanning@planning.localgov.ie>
Reply-To: OnlinePlanning <onlineplanning@planning.localgov.ie>
To: c.foster454@gmail.com

Wed, Jun 24, 2026 at 11:03 AM



Submission No.:
150000047747

Date of Issue:
24/06/2026
11:03am

THIS IS AN IMPORTANT DOCUMENT

KEEP THIS DOCUMENT SAFELY. YOU WILL BE REQUIRED TO PRODUCE THIS ACKNOWLEDGEMENT TO AN COIMISIÚN PLEANALA IF YOU WISH TO APPEAL THE DECISION OF THE PLANNING AUTHORITY. IT IS THE ONLY FORM OF EVIDENCE WHICH WILL BE ACCEPTED BY AN COIMISIÚN PLEANÁLA THAT A SUBMISSION OR OBSERVATION HAS BEEN MADE TO THE PLANNING AUTHORITY ON THE PLANNING APPLICATION.

Mayo County Council

PLANNING APPLICATION REFERENCE No: 2660398

A submission/observation in writing, has been received from Chris Foster on 22/06/2026 in relation to the above planning application.

The appropriate fee of €20 has been paid. (Fee not applicable to prescribed bodies)

The submission/observation is in accordance with the appropriate provisions of the Planning and Development Regulations 2001 and will be taken into account by the planning authority in its determination of the planning application.

Yours faithfully,
Mayo County Council

IS DOICIMÉAD TÁBHACHTACH É SEO

COINNIGH AN DOICIMÉAD SEO SLÁN. BEIDH ORT AN ADMHÁIL SEO A CHUR AR FÁIL DON BHORD PLEANÁLA MÁŠ MIAN LEAT ACHOMARC A DHÉANAMH IN AGHAIDH CHINNEADH AN ÚDARÁIS PHLEANÁLA. IS É SEO AN

To: Mayo County Council
Planning and Development Section
Aras an Chontae
Castlebar, Co Mayo

Knockaunakill
Mayo Abbey
Claremorris
Co Mayo

21 June 2026

Dear Sir/Madam

re: Planning Application Reference: 2660398

I wish to object to the proposed Cunlaghfadda Green Energy Limited Windfarm Development at Knockroe, Cunlaghfadda, Harefield, Cloonbaul and Knockaunakill, Co Mayo.

I live in the village of Knockaunakill and am very concerned about the impact the project would have on my home, health and quality of life, along with the significant impacts that would result on our surrounding environment, wildlife and landscape.

These massive turbines would dominate the local landscape, altering the rural character of the area. The impact from noise generated is also very concerning as these turbines operate continuously, so there will be no escape from this intrusive noise in our quiet villages. I also have concerns regarding the overall environmental impacts, effect on our local wildlife, bird populations and the overall ecological balance of the area, as noted in more detail below.

1) NOISE

Relentless noise from 7 x 160m turbines together with continuous 110kV substation hum, will undermine the enjoyment of my home. Turbines also create low frequency noise that carries over long distances and highly likely to impact on sleep. Purely from a physical and mental health point of view I believe it is totally unacceptable to consider siting such massive turbines so close to our homes.

The substation and grid masts are even closer again to my home therefore I would be impacted by:

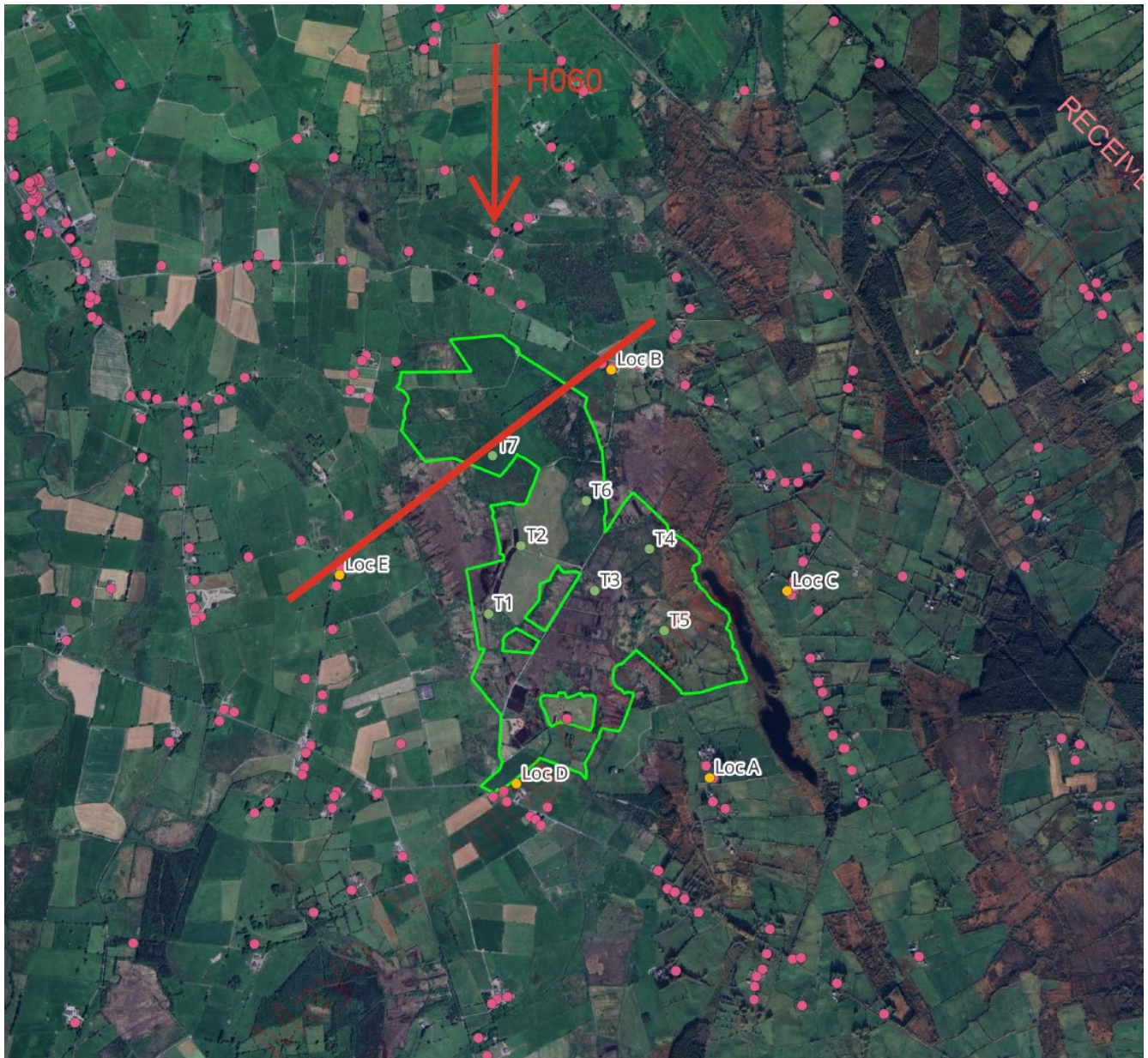
- Continuous noise from the wind turbines
- Continuous noise from the substation
- Also, I believe I will be further impacted due to the prevailing winds (South/SW) meaning I would be downwind of the turbines and this would result in additional noise annoyance.

I have no doubt the overall impact would be severely detrimental for my health, sleep, and residential amenity.

The Noise Survey was based on just 5 monitoring locations (please see map below), none of which were placed near my home - the closest being 'Loc B' at the far Eastern tip of Knockaunakill loop. This location also happens to be the site of Monaghan Bros Bar Furniture; a busy factory site operating heavy machinery, sawing, and woodworking every day. This factory is the only source of industrial noise in the entire area and yet it was this that what was used to establish a baseline for Sensitive Receptors, like myself (H060), based in quiet areas at the opposite Western tip of the Knockaunakill loop. Recording higher daytime noise at the factory and using this for Sensitive Receptors on the Western side, results in a skewed result that masks the real impact of the turbines on my property.

I see there are also no monitoring station locations across any of the Northern or upper areas of the site, which again indicates a selective approach. Prevailing winds here are generally South West/Westerly, therefore all homes in the Northern or upper areas of the site will be downwind of the turbines and will experience even greater noise impacts.

The strategic placement of noise monitors together with omitting the exposed downwind Northern sections, means data has been generated to be favourable while hiding the true impact - please see map below.



Noise Monitoring Locations: (A) Zero monitoring carried out at Northern end of the site
(B) Loc B = Monitor at West of loop & Monaghan Factory = closest to H060
on opposite side of Knockaunakill loop

2. GUIDELINES

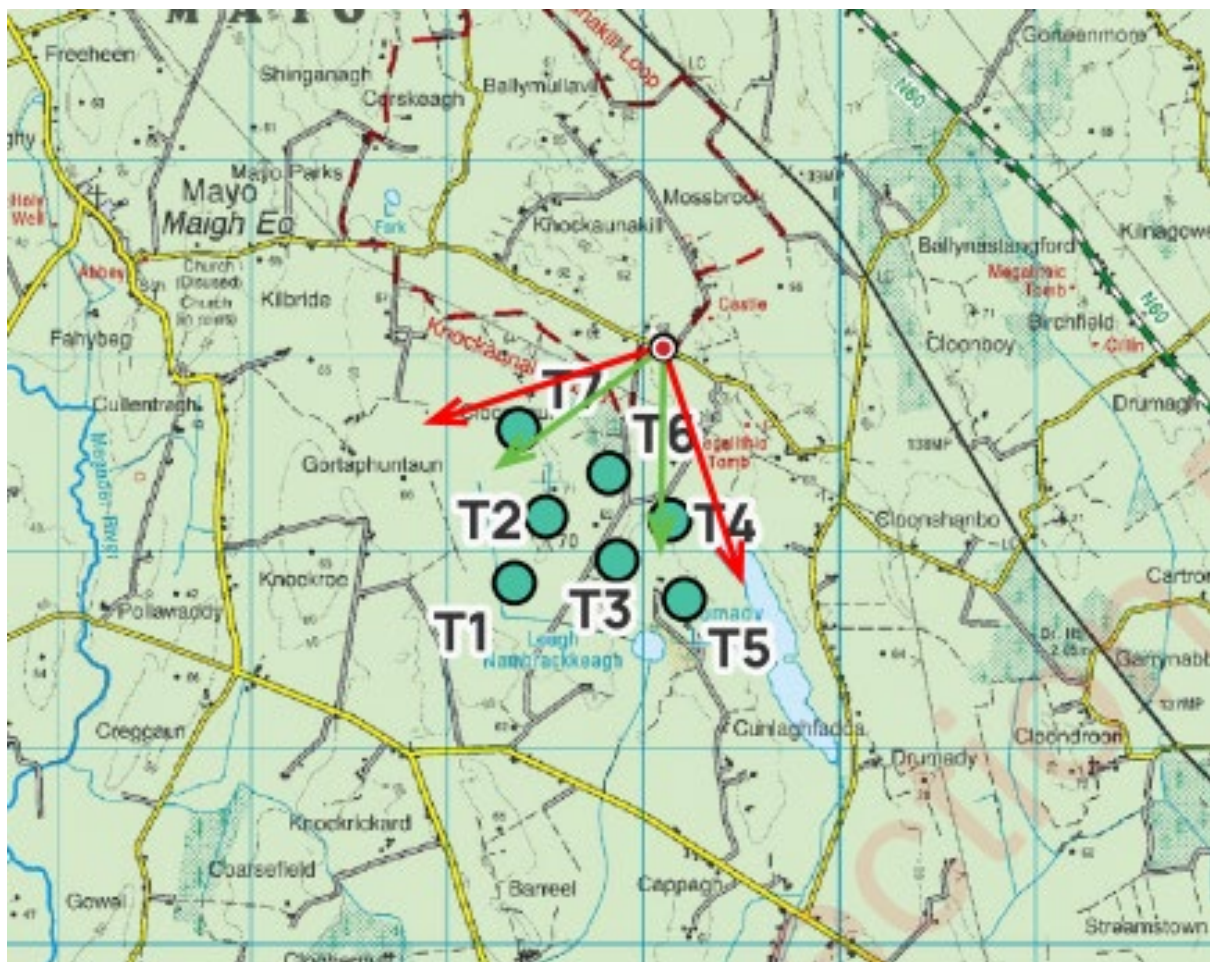
The national Wind Energy Development Guidelines are undergoing critical high level review, particularly regarding noise, setback, and shadow flicker. A Strategic Environmental Assessment is currently underway. The developer agrees they are operating in a regulatory grey area while the Institute of Acoustics (IOA) and Government departments review the standards, yet they are continuing to push ahead using obsolete 2006 guidelines regardless. I believe a development of this industrial scale cannot be approved based on standards that are currently being superseded with the expectation that compliance may be retrofitted later. To grant permission while the rules regarding setback, noise and community protection are actively being overhauled, and while a Strategic Environmental Assessment (SEA) is concurrently underway, would be premature and undermine the purpose of the DoHLGH ongoing review.

3. VISUAL IMPACT

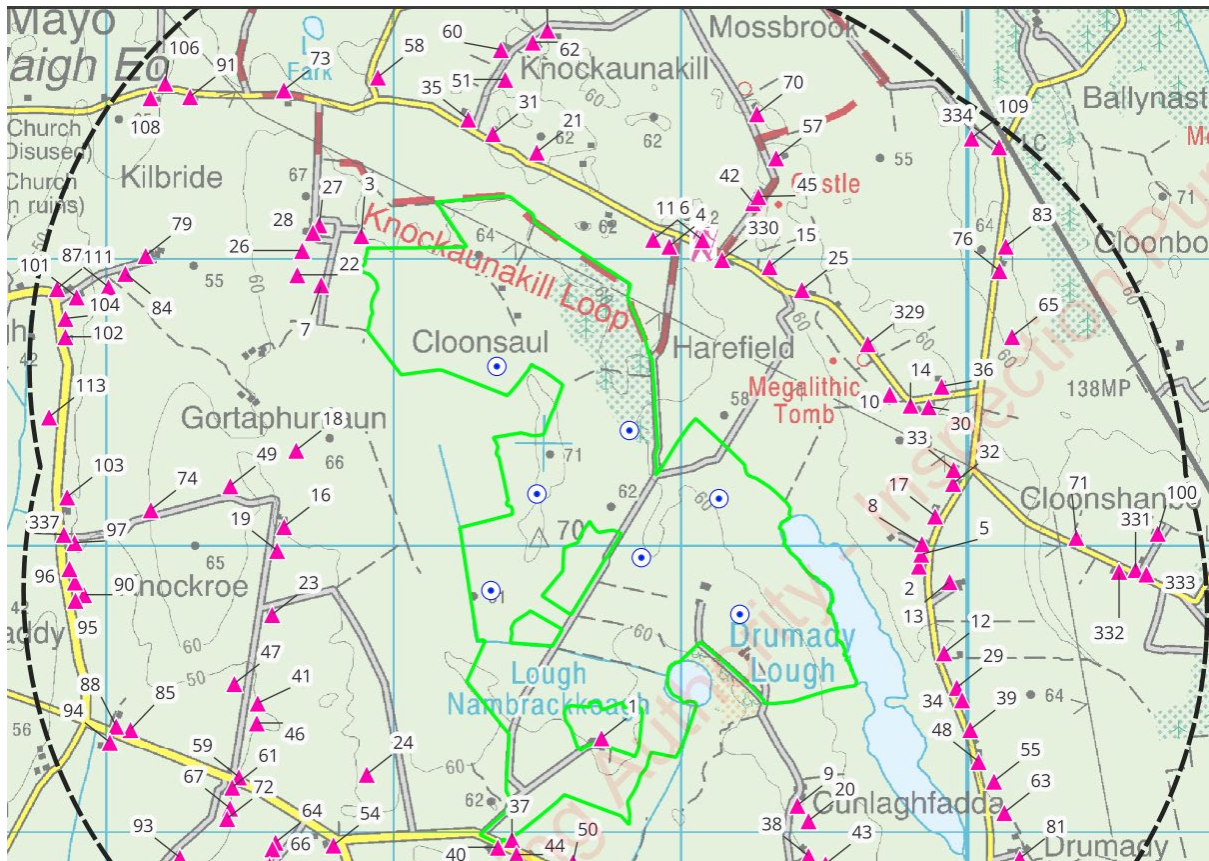
The height and scale of this development (7 x 160m tall turbines, 3.2 acre footprint 110kV substation, 36m telecoms tower and 2 x 16m end grid masts) would result in an oppressive industrial visual impact from my home and on my residential amenity, not just for me and my family but for the wider rural community and landscape.

Photomontages should be genuine and show the true visual dominance on Sensitive Receptors and the surrounding landscape. I have lived in Knockaunakill village for over 20 years and it's clear that much thought was given to locations for the photomontage imagery. For example, as can be seen from the map below, the image provided for Knockaunakill is taken from the furthest Eastern tip of the loop (I live at the far Western tip). An image taken from the other end of the Knockaunakill village loop is not indicative of the dominance these massive structures will have (together with associated 3.2 acre 110kV substation) on my home and on all the other Sensitive Receptors whose homes are at or towards the West end of the loop (the map shows there are a significant number of Sensitive Receptors at/towards the Western side of the Knockaunakill loop).

This means our local authority has not been presented with the true picture – the real severity of visual impact on our residential community. I also note there is no photomontage for Cloonbaul (being one of the 5 townlands comprising the development site) or the adjacent village of Knockroe - despite both being within the immediate visual impact zone of the proposed project.



'Knockaunakill' Photomontage – Photomontage image taken from far EASTERN tip of Knockaunakill Loop



Sensitive Receptor Map – note large nos. of impacted homes at / towards WESTERN end of Knockaunakill Loop

I note the submitted documentation makes virtually no reference to Mayo Abbey, but references the town of Claremorris at every given opportunity. My correct postal address (for 'Sensitive Receptor H060') is 'Knockaunakill, Mayo Abbey' **not** Claremorris, and the same applies for each of the 5 townlands forming part of the overall proposed development site.

I also believe the statutory notices were misleading in this regard, presumably in order to separate this massive industrial wind and associated 110kV substation project from its true sensitive location. The statutory notices referenced those 5 deeply rural townlands followed simply by "County Mayo" – I am surprised that this passed as a proper recognisable postal address for the lands concerned. I believe the omission of Mayo Abbey was deliberate to minimise public awareness by masking the intended industrialisation of a protected 7th century monastic settlement.

Mayo Abbey (Mayo of the Saxons) is a recorded archaeological monument of international historical and cultural significance and the foundational heritage from which County Mayo derives its name. 7 x 160m turbines being sited in the historical setting of this ancient monastic site would be an unacceptable degradation of our cultural heritage. Also, under national planning guidelines and the Mayo County Development Plan, protection extends beyond the physical footprint of a monument to encompass its wider landscape setting. These 160m tall modern industrial turbines would absolutely dominate the horizon and result in a visual conflict that would destroy the historic character and spiritual integrity of this monastic landscape. The industrial scale of these 160m tall turbines and huge substation is entirely incompatible with the cultural heritage, historical amenity, and rural character of Mayo Abbey.

4. SHADOW FLICKER

Shadow flicker will affect numerous residents, with at least 40 homes exceeding daily thresholds. The mitigation procedures appear totally inadequate and would fail to prevent the severe personal impact of attempting to live with this burden. I have seen a video of the impact shadow flicker has and it is very clear that it creates an absolutely intolerable living environment that would destroy the comfort and peace of mind we all expect in our own homes.

5. PROPERTY BLIGHT

The submission notes the development will have a direct negative impact on residential property values within 1 - 2km of the site. However, they then go on to dismiss any long term impact of the damage by referencing research based on property markets in the USA and Scotland. Property markets in the USA and Scotland are entirely different to rural Ireland and to apply foreign data to minimise devaluation of our property is a distortion.

Homes in quiet rural areas get their market value from the peacefulness, scenic outlook, and residential amenity. These qualities would be permanently stripped by this massive industrial infrastructure. No potential buyer would pay premium market value to live in the visual and acoustic shadow of an industrial scale wind farm and associated 3.2 acre 110kV substation. The documentation quotes a figure of -14.7% but goes on to state that any impact will be “*slight*” and “*short term*”. This is speculative, unprovable, and relies on impossible foresight. Indeed they acknowledge that home devaluations may be far more substantial yet go on to urge the local authority to disregard these extreme impacts on the basis that they deem the overall number of affected properties to be ‘insignificant’ in the general scheme of things. For immediate financial devaluation to be admitted, while expecting us to accept hugely significant losses on the unevidenced (foreign data based) promise that it might recover later is unacceptable.

I am very concerned that the severe degradation of residential amenity, driven by unacceptable noise, visual dominance, and shadow flicker, will result in a substantial and irreversible blight on my family home. Properties situated in such close proximity to industrial scale turbines frequently suffer catastrophic impacts on their market value and extensive evidence suggests that rural residential properties exposed to the immediate operational footprint of wind farms can experience severe devaluations of up to 50%.

6. JAPANESE KNOTWEED

I am very concerned regarding the widespread presence of Japanese Knotweed within the site. Under Irish law (Regulations under the Wildlife Act), it is an offence to plant, disperse, or cause the spread of this highly destructive invasive species. The development requires extensive deep groundworks and there is huge risk of cutting through the root system where even a microscopic fragment can generate a new colony, creating an unmanageable risk of proliferating the weed across the site and into our adjoining private lands. The 18–24 month construction phase would require huge volumes of HGV and other traffic moving in and out of the site. Any contaminated mud or microscopic fragments clinging to vehicle tyres or tracks would pose an extreme threat of spreading this weed onto local public roads, neighbouring properties, and agricultural farmlands, causing severe environmental damage to the community.

7. WILDLIFE

The site is an established breeding habitat for vital birds of prey. Sparrowhawks, Kestrels, and Buzzards are frequent visitors around my home and our village. In addition, Curlews are frequently seen and heard around the area, breeding pairs of which are now close to extinction and strictly protected under Irish and EU law. The proposed infrastructure would pose a severe threat to these birds. The introduction of high velocity industrial hazards into nesting, hunting and foraging zones violates the EU Birds Directive and fails to ensure the necessary protection of our native wildlife.

8. DESTRUCTION OF RURAL HERITAGE

Delivery of components for this project requires massive abnormal load convoys that cannot be accommodated by the existing public road network, hence extensive invasive works are proposed along the entire route, including:

- demolition of ancient local stone walls
- widespread tree felling
- removal of mature roadside hedgerows
- straightening of historic road bends
- removal of established overhead utility wires

Stone walls and roadside hedgerows along the proposed haul route are historical elements of our rural landscape and demolishing these to accommodate temporary construction access constitutes unacceptable and irreversible injury to the character and visual amenity of the public road network.

These hedgerows and treelines are vital for local wildlife, bird populations, and foraging bats. The tree felling and boundary removals would cause catastrophic destruction along the route. The extensive modifications required to make these roads temporarily passable demonstrate that the development is incompatible with the existing public infrastructure. In addition, the local rural road network is completely unsuitable for heavy construction traffic and poses a direct safety risk to local walkers, cyclists, and school children.

9. WATER SUPPLIES / LOCAL WATERCOURSES

My home has a bored private well and I am concerned that the massive excavation works required may disrupt the water table or contaminate my supply. I can find no detail within the submission documentation regarding the well on my property.

10. LOCAL FLOODING

The proposed site is located within an area highly susceptible to severe flooding, particularly for the area of Knockaunakill. For example, in November 2024 Knockaunakill and the surrounding area was completely isolated for several days as all access routes were impassable due to extensive flooding. The only transport in or out during this time was tractor. The destruction of existing peatlands and introduction of hundreds of thousands of tonnes of concrete and infrastructure would have catastrophic hydrological consequences for our area (please see Appendix A – Local Flooding).

11. EIAR - COMPARISON OF ENVIRONMENTAL EFFECTS / CONSIDERATION OF REASONABLE ALTERNATIVE

I note the Consideration of Reasonable Alternative in the EIAR has been engineered to provide a misleading benchmark. By submitting an 'initial proposal' of 8 turbines (a figure even higher again than the 3-5 turbine cap) they successfully engineer an overall artificial improvement of the environmental impact from the 'final' 7 turbine scheme. It is a mathematical certainty that reducing an 8 turbine project to 7 will produce results of 'reduced' impact. This calculated methodology is a mechanism to downplay the true, adverse effects this massive industrial project would have on our community and landscape.

12. ZONING

In my opinion the proposed site is not suitable for a wind energy development. However, I do wish to address Mayo County Council's Renewable Energy Strategy, which designates Tier 1 zones as potentially suitable only for *"smaller clusters of wind turbines, clusters of up to three to five turbines depending on site conditions and visual amenity."*

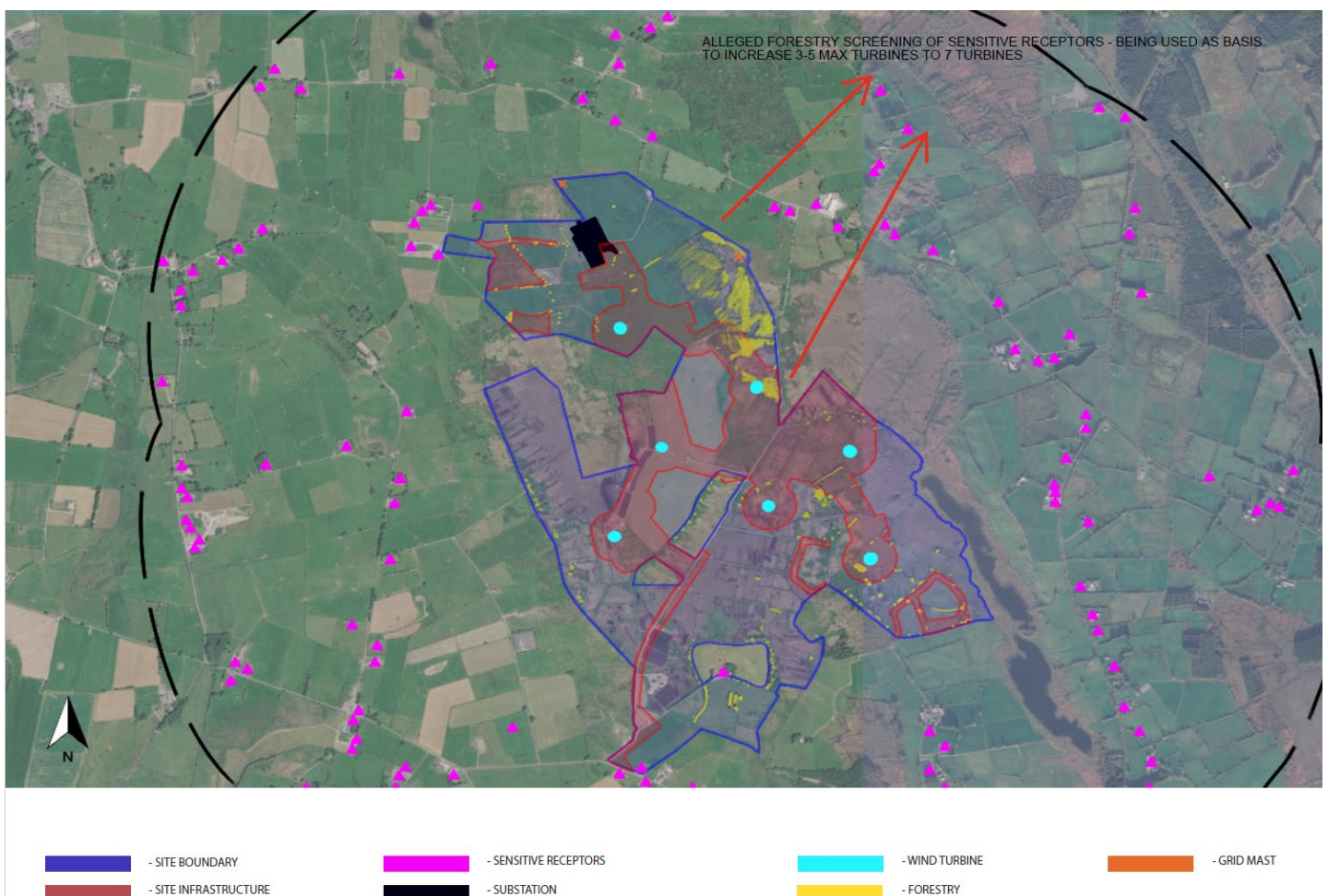
The applicant is looking to bypass Mayo County Council's own policy by seeking to increase the maximum cluster size from 5 up to 7 turbines. The applicant notes *"While there are 7 turbines proposed .. which exceeds the range of three to five turbines .., the turbine layout considered was considered to be appropriate for the site following consideration of site conditions and visual amenity"*. Their justification being the presence of a small amount of private forestry on the site, arguing it will act as natural screening. This argument is flawed as private commercial forestry is temporary and can be felled at any time. Relying on temporary timber crops, just 20-25m tall, as a permanent mitigation for visual impact to screen 160m tall turbines is simply absurd.

Please let me be clear, while I am addressing this specific breach of policy, my primary position remains that no wind farm development of any scale is appropriate on this unsuitable site. Increasing the density to 7 turbines only exacerbates an already unacceptable threat to our community.

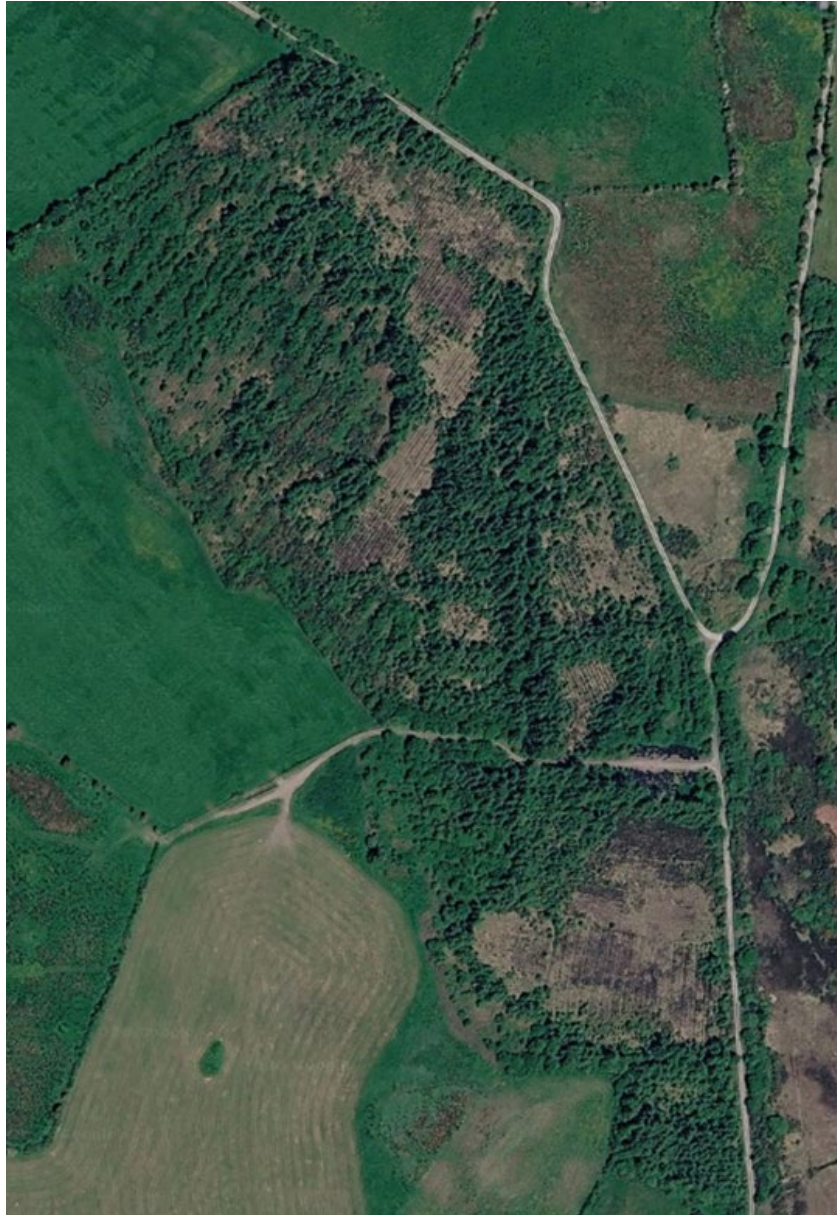
Furthermore, even if the existing forestry were to remain, the site possesses negligible tree cover; as noted by the Bat Report, which confirmed the site is “*predominantly agricultural grassland with only a small area of commercial conifer plantation (0.50 ha)*”. This was backed up by the EIAR which describes the landscape as “*mostly peatland and pastoral agricultural land*” and the Site Summary as “*a mix of agriculture pastoral lands and peatland*”.

The screening value of trees on the site is not only being overstated, they are also relying on an trees they themselves have scheduled for destruction, and I quote the EIAR; “*approximately 0.7ha (Hectares) of forestry comprising conifer plantation will be felled as part of the proposed project.*” It is contradictory to argue that 160m industrial turbines can be visually screened by trees that are scheduled for felling to accommodate the development. Even if the few sparse areas of forestry were left unharvested, the claim that 20m tall trees could ever ‘screen’ industrial structures 140m taller is simply flawed.

As can be seen from the map below, where all forestry across the entire site is highlighted in yellow, the applicant’s alleged ‘screen’ (which forms their entire basis for increasing a maximum number of turbines from 5 to 7), would only ‘shield’ (!) approximately 8 of the overall 340 Sensitive Receptors.



Consequently, there would be no screening whatsoever (as absurd as the suggestion is) between the massive industrial infrastructure (including 36m tall telecoms tower, two 16m tall end grid masts, 3.2acre 110kV substation, and seven 160m tall turbines) and the remaining 332 Sensitive Receptors. Furthermore, aerial photography confirms that very little of this local forestry remains, as it has been largely cleared through either harvesting and/or storm damage, see overleaf.



In view of the above, I suggest the justification for increasing the turbine count from a max of 5 to 7 based on 'visual screening from forestry' is baseless and should be dismissed. I also attach photographic evidence taken just last week, demonstrating the actual nature of the site and the proposed turbine locations, which consists in the main of open pastoral agricultural grasslands and exposed peatlands with zero capacity to absorb or screen 160m tall structures (Appendix B – Alleged Screened Site).

13. OUTDATED PLANNING GUIDELINES

As mentioned above it is widely acknowledged that the current 2006 Wind Energy Development Guidelines are outdated and not fit for purpose. The 2006 guidelines were designed for turbines 50m tall with a standard 500m setback. If that ratio was considered appropriate to protect residential amenity then, it must be the minimum standard applied today; so this equates to a 1.6km setback for 160m turbines. Applying 20 year old criteria without adjusting for the tripling in height of these turbines is a failure of planning oversight and exposes our rural communities to impacts that were never considered in 2006.

The replacement guidelines (National Planning Statement on Wind Energy) have been drafted and are being finalised to address noise measurement and assessment standards / setback distances and shadow flicker.

I believe all wind farm applications that have potential to impact residential homes should be frozen pending the introduction of the new regulations that are being designed to adequately protect our communities. To ignore this and plough ahead using outdated criteria (that is wholly inadequate for assessing the physical and acoustic impacts of these huge modern turbines on human health and rural amenity) to approve a wind farm, will absolutely devastate the quality of life for all residents within the impact zone. The 2006 guidelines are simply incapable of managing the environmental, physical, and visual scale of modern turbines. The Government are aware of this, the local authorities are aware, and the public is aware; hence I feel it would be negligent to proceed with an approval in light of these known failures.

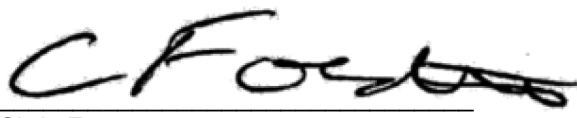
14. HEALTH SERVICE EXECUTIVE

In its recent submissions (late 2025 / early 2026 planning observations), the HSE acknowledges that wind energy technology and scale have significantly changed since the original 2006 guidelines. They highlight that there is a growing body of knowledge regarding population health impacts, specifically concerning characteristics of noise emissions and shadow flicker, and advocate for limits consistent with World Health Organization standards.

15. CONCLUSION

For the reasons outlined above, and I would reiterate the fact that the Wind Energy Development Guidelines 2006 guidelines are out of date and should not be relied upon regarding the massive wind farm infrastructure that is being proposed some 2 decades later, I respectfully request that Mayo County Council refuse planning permission for this application.

I enclose the statutory fee of €20 and look forward to receiving a formal acknowledgement.

Signed: 
Chris Foster

APPENDICES

- Appendix A** - Local Flooding around Knockaunakill
- Appendix B** - Alleged Screened Site – Photographs & Map



Local Flooding around Knockaunakill / Harefield







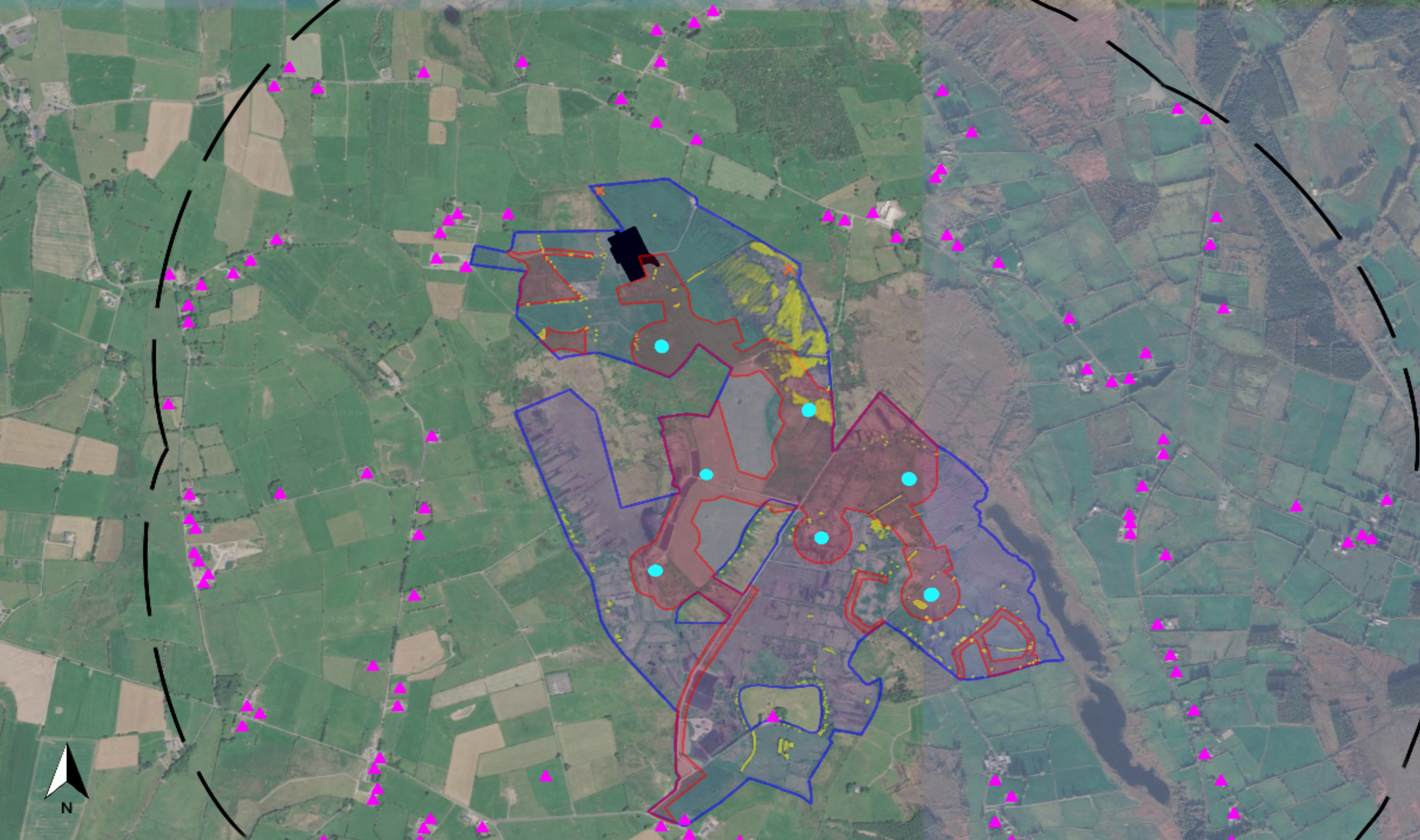
Local Flooding around Knockaunakill / Harefield





Local Flooding around Knockaunakill / Harefield





- SITE BOUNDARY



- SENSITIVE RECEPTORS



- WIND TURBINE



- GRID MAST



- SITE INFRASTRUCTURE



- SUBSTATION



- FORESTRY



Knockaunakill – from West end of loop





Knockaunakill – from West end of loop





Knockaunakill – from West end of loop





SITE REALITY VS. APPLICANT'S SCREENING CLAIMS

Unscreened Panoramic View Towards Turbine Site





SITE REALITY VS. APPLICANT'S SCREENING CLAIMS

Unscreened Panoramic View Towards Turbine Site





SITE REALITY VS. APPLICANT'S SCREENING CLAIMS

Unscreened Panoramic View Towards Turbine Site





SITE REALITY VS. APPLICANT'S SCREENING CLAIMS

Unscreened Panoramic View Towards Turbine Site





SITE REALITY VS. APPLICANT'S SCREENING CLAIMS

Unscreened Panoramic View Towards Turbine Site





SITE REALITY VS. APPLICANT'S SCREENING CLAIMS
Unscreened Panoramic View Towards Turbine Site





SITE REALITY VS. APPLICANT'S SCREENING CLAIMS

Unscreened Panoramic View Towards Turbine Site





SITE REALITY VS. APPLICANT'S SCREENING CLAIMS

Unscreened Panoramic View Towards Turbine Site





SITE REALITY VS. APPLICANT'S SCREENING CLAIMS

Unscreened Panoramic View Towards Turbine Site





SITE REALITY VS. APPLICANT'S SCREENING CLAIMS

Unscreened Panoramic View Towards Turbine Site