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

Re: Submission/Observation on Case Reference VA16.324429 — Proposed 110kV Electrical Substation, Loop-In Grid Connection and Associated Infrastructure and Works, Townland of Cloonbaul, County Mayo (Applicant: Cunlaghfadda Green Energy Limited)

Dear Sir/Madam,

As set out in the developer's own notice under section 182A of the Planning and Development Act 2000, as amended, the proposed development comprises: a 110kV electrical substation compound with two single-storey control buildings, welfare facilities, electrical plant and apparatus, underground cabling, lighting columns, lightning masts, fencing, access gates, signage, two wastewater holding tanks and two rainwater harvesting tanks; approximately 982 metres of 110kV underground cabling with two new end masts approximately 16 metres in height and associated hardstanding, to facilitate a loop-in/loop-out connection into the existing Castlebar to Cloon 110kV overhead line; a telecommunications tower approximately 36 metres in height with associated foundation, hardstanding, fencing and access gate; a temporary construction compound; new permanent and temporary site access tracks; tree felling and vegetation removal; site drainage; and all related site works. A ten-year planning permission is sought. I set this out in full because the scale of what is proposed — in particular a 36-metre telecommunications tower and 16-metre end masts, together with the associated tree felling and vegetation removal — is considerably more than a modest electrical compound and is central to the grounds of objection set out below.

The observations in this submission are based on my review of the application documents referred to throughout. Given the scale and volume of the documentation submitted in support of this application, across the EIAR, Natura Impact Statement, and their appendices, I have not been able to review every page of every document. Where I raise a concern about an apparent absence of information, I do so on the basis of what I have been able to review, and I respectfully ask that the Commission require the applicant to confirm directly whether the matter is addressed elsewhere, rather than treating my inability to locate it as conclusive either way.

I wish to state clearly that I object to the granting of permission for this development, for the reasons set out below.

1. Impermissible Project-Splitting — This Application Cannot Lawfully Be Assessed in Isolation

This substation application is one of three interlinked pieces of major energy infrastructure now before the planning system in relation to the same lands at Cunlaghfadda/Cloonbaul, Mayo Abbey:

- The Cunlaghfadda Wind Farm (7 no. turbines, refused by Mayo County Council under Planning Authority Ref. 2660398), now the subject of a first-party appeal to An Coimisiún Pleanála under Case Ref. PL16.501853;
- This 110kV substation and loop-in grid connection (Case VA16.324429), lodged directly with An Coimisiún Pleanála as Strategic Infrastructure Development;

- A proposed Battery Energy Storage System (BESS) at the same Cloonbaul location, for which a site notice was erected by the developer's agent on 14 August 2026, and which residents have only very recently been made aware of.

It is well established in Irish law that a wind farm and its grid connection or substation cannot lawfully be split into separate developments for planning and environmental assessment purposes. In *O'Grianna & Ors v An Bord Pleanála* [2014] IEHC 632, the High Court (Peart J) held that a wind farm and its grid connection were one project, neither being independent of the other, because the turbine development serves no function if it cannot be connected to the national grid. That principle has been consistently applied since, including in *North Westmeath Turbine Action Group v An Bord Pleanála* [2025] IEHC 367, where the High Court quashed a wind farm permission because the public notices failed to refer to the accompanying 26km grid connection, holding that a wind farm and its grid connection must be assessed, and notified to the public, as a single integrated project.

Applying these principles here: the substation the subject of this application is not an end in itself. It exists to serve the C unlaghfadda wind farm's grid connection and, on the developer's own site notice, is directly linked by underground cabling to the proposed BESS. Mayo County Council has refused the wind farm; that refusal is under appeal. I submit that the Commission cannot lawfully determine this substation application in isolation from that appeal, and that to do so would repeat the precise error identified in the case law above.

This is confirmed by the applicant's own documentation. The Population and Human Health chapter prepared in support of the BESS application currently before Mayo County Council states, in terms, that the proposed development "will be examined as a whole from a population perspective due to elements relating to the Proposed Wind Farm, Proposed Grid Connection and Proposed BESS being located within the Site," and that these elements are considered separately only where the assessment specifically identifies a need to do so. This is the applicant stating outright, in its own words, that the wind farm, the grid connection encompassing this substation, and the BESS are treated as a single project for the purposes of population and human health assessment. I submit that the Commission should treat this admission as compelling confirmation that this substation cannot lawfully be assessed as a standalone development.

It is also relevant that this application has been made directly to An Coimisiún Pleanála as Strategic Infrastructure Development under section 182A of the Planning and Development Act 2000, as amended, rather than to Mayo County Council in the ordinary way. This procedure exists precisely for developments considered to be of such scale or significance that they warrant assessment by a single national authority, in one comprehensive process, rather than fragmented local determination. I submit that this makes it more, not less, important that the substation be assessed together with the wind farm and BESS as a single integrated project, since the entire rationale for the Strategic Infrastructure Development process is undermined if a development routed to the Commission on the basis of its scale and significance is then assessed as though it were an isolated, minor element of a wider scheme. I would also note that the qualification of this substation for the Strategic Infrastructure Development route arises from its voltage classification, not from any demonstrated standalone strategic function independent of the wind farm it serves; it should not be treated as evidence of independent significance separate from the generation project addressed at Sections 1 to 2 above.

A further consequence of this application proceeding directly to An Coimisiún Pleanála, rather than to Mayo County Council, is that the Council has not had the statutory opportunity to consider or report on this substation application at all. This is a consequence of the circumstances of this development — a 110kV substation of this kind falls to be determined directly by the Commission as Strategic Infrastructure Development — rather than any discretionary choice available to the applicant. Notwithstanding this, Mayo County Council has already made detailed and directly relevant findings on the landscape sensitivity, cultural heritage, and residential amenity of this exact locality in refusing the connected wind farm. I respectfully request that the Commission give particular and careful weight to those existing local authority findings, set out at Section 4 below, precisely because the ordinary opportunity for the Council to weigh in on this specific application was not available given the statutory route this application was required to follow.

2. No Credible Standalone Planning Need Has Been Demonstrated

Separately from the legal project-splitting point, the applicant has not, as far as I am aware, demonstrated any standalone justification for this substation independent of the refused wind farm. The Commission is entitled to ask: what specific generation or network demand does this substation serve; absent the turbines it was designed

to connect? Why is this exact site and scale required now, when the associated generation project has been refused planning permission? What alternatives, including deferral, were considered? Permission should not be granted for major industrial electricity infrastructure in the abstract, on the basis that it might in future facilitate renewable development, when its real and only purpose is to serve a specific, currently refused generation project.

On this point, the applicant's own documentation prepared for the related wind farm application removes any doubt. It states in terms that the onsite 110kV substation is required to consolidate the electrical energy generated by each wind turbine and export that electricity to the national grid and confirms that access to the substation itself is via the wind farm's own internal access tracks, off the L-15053. This is the applicant's own confirmation that the substation has no function independent of the turbines it was designed to connect, and that it is not even independently accessible without the wind farm's own access infrastructure being constructed. I submit that this removes any credible basis for treating the substation as a standalone development capable of being assessed, or permitted, separately from the wind farm it exists to serve.

3. The Developer's Own Site Notice Confirms This Is Treated as One Integrated Project

The site notice erected in respect of the BESS application, dated 14 August 2026, describes the BESS as connected by approximately 220 metres of underground electrical and communications cabling to this substation's control building, and states that the EIAR and NIS prepared in respect of the BESS assess the full extent of the BESS development together with the wider project infrastructure, including the associated wind farm development and grid connection, which are the subject of separate applications to Mayo County Council and to this Commission respectively. This is, in substance, an acknowledgement by the developer itself that the wind farm, the substation, and the BESS form a single, integrated electricity-generation and storage project. I submit that the Commission should treat this acknowledgement as further confirmation that the substation cannot properly be assessed, or determined, as a free-standing development.

4. The Mayo County Council Refusal of the Wind Farm Is a Highly Material Planning Consideration

While a substation is a distinct form of development and will be assessed on its own merits, Mayo County Council's refusal of the associated wind farm is nonetheless highly material to this application, for three reasons.

First, the Council found the wider location itself unsuitable for major energy infrastructure, describing the site as an open, exposed, populated rural area within a landscape sensitivity policy area carrying high to medium potential for adverse landscape impact. A substation, with its compound fencing, transformers, gantries, lighting, end masts and access works, is also industrial infrastructure sited within that same sensitive landscape envelope.

Second, the Council found that the development would detract from the area's cultural heritage and undermine the setting of Mayo Abbey Cemetery and Church ruins. A substation situated within the same visual catchment and historic landscape can still cause harm to that setting even where it is a lower structure than a turbine.

Third, the Council found that the extent of mitigation technology required to address shadow flicker for some 40 residential properties itself demonstrated that the area was unsuitable for development of this nature and scale, given the level of surrounding residential development. That finding of a heavily populated, residentially sensitive locality applies with equal force to a substation capable of generating continuous operational noise. The Council's own decision, in the same reason, further found that the development would have the potential to seriously impact residential amenity and depreciate the value of property in the area. This concern is consistent with published Irish research: a 2023 University of Galway study of house prices across seven western and southern counties, including Mayo, found a robust and statistically significant reduction in property value of approximately 14.7% within 1km of a wind turbine, with the discount increasing for taller turbines and higher turbine density. I raise this briefly here as it reinforces the Council's own concern for the residential amenity and property value of this area; I intend to address the point more fully, by reference to the specific turbines involved, in any submission I make on the related wind farm appeal.

I am aware that the applicant's own Population and Human Health chapter addresses property values specifically in relation to grid infrastructure, citing an EirGrid literature review of 31 international transmission project case studies and concluding that it is unlikely the proposed grid connection will have a significant effect on property values. I do not consider that a general international literature review of this kind displaces the Council's own considered, site-specific planning judgement on this exact locality. A review drawing on unrelated transmission

projects in different countries, landscapes, and settlement patterns cannot substitute for the planning authority's own assessment of this particular site, its particular concentration of surrounding dwellings, and its particular cultural and heritage sensitivities. I ask the Commission to give the Council's own local finding materially greater weight than a generic literature review not specific to this site.

It is also notable that the applicant's own Landscape and Visual chapter, prepared for the related wind farm application, describes the site as located within "the sparsely populated, undulating landscape within the plains of County Mayo," and states in the same chapter that "it is not a densely populated area, with residential receptors primarily situated along the local road network." The same chapter rates the landscape sensitivity of the site as "Medium," which it separately describes as the lowest sensitivity classification available for this type of development. This self-characterisation sits in direct tension with two things: Mayo County Council's own express finding, in refusing the related wind farm, that the site lies in an open, exposed, populated rural area with high to medium potential for adverse landscape impact; and the applicant's own noise-sensitive receptor mapping, addressed immediately below, which identifies well over 300 individual dwellings surrounding the site. I respectfully submit that the Commission should not accept the applicant's own description of this landscape as sparsely populated, not densely populated, or of low sensitivity at face value, where it conflicts so directly with both the planning authority's considered assessment and the applicant's own separate mapping of the resident population.

The true scale of the surrounding population is, in fact, considerably greater than the 40 properties addressed for shadow flicker alone. The applicant's own noise-sensitive receptor mapping for this project, found at Appendix 12-4 of the applicant's own documentation and an extract of which is attached as Appendix C, identifies individual dwellings by reference number running from H001 to beyond H340 — well over 300 separate noise-sensitive properties surrounding the site. This is not a sparsely populated location where a small number of neighbouring landowners are affected. It is a densely settled rural landscape in which several hundred individual households fall within the study area the applicant's own consultants considered necessary to survey. Every one of these families and neighbours, not mine alone, is entitled to have their home and residential amenity protected from this development. I request that the Commission weigh the true scale of this resident population, as demonstrated by the applicant's own mapping, when assessing whether this location is suitable for a 110kV substation, its end masts, and the wider energy infrastructure project of which it forms part.

5. Cumulative Impact of the Substation, Wind Farm and Battery Storage Proposals

The substation itself is not a minor structure. The applicant's own wind farm environmental documentation states that the onsite 110kV substation compound measures approximately 12,405 square metres and includes two control buildings and the electrical substation components necessary to consolidate the electricity generated by each turbine, in addition to a telecommunications tower, end mast structures, compound lighting and lightning protection masts, underground cabling, access roads and drainage infrastructure. Taken together with seven 160-metre wind turbines and a large-scale battery storage facility, this represents the industrialisation of a rural area over a sustained period, not a single modest infrastructure project.

I ask that the Commission require a full cumulative impact assessment of all three elements — substation, wind farm, and BESS — considered together, rather than continuing to assess each in isolation through separate processes, and that it decline to determine this substation application until such a cumulative assessment is available.

I am also concerned by the pattern in which the scope of industrial energy infrastructure proposed for this single site has grown since the original wind farm application was first lodged. What began as a proposal for wind turbines and their necessary grid connection has since expanded to include this substation, applied for separately as Strategic Infrastructure Development, and now a Battery Energy Storage System, for which a site notice was erected on 14 August 2026 and which is currently before Mayo County Council. This BESS was not part of the original scheme disclosed to residents or to the Commission; it emerged only after both the wind farm and this substation applications were already underway. Each addition has arrived as a further, separate application rather than as part of one complete proposal disclosed from the outset. I am concerned that the full and final extent of industrial energy infrastructure intended for this site has still not been disclosed to residents or to the Commission, and I request that the Commission require the applicant to confirm, in clear terms, whether any further expansion, extension, or additional infrastructure at this site — including further battery storage capacity, additional grid

connections, or expansion of the substation compound itself — is currently planned, anticipated, or under consideration, so that this application is not being assessed in ignorance of a scheme that continues to grow.

I have also reviewed the applicant's own Appendix 2-3, "Projects Considered in the Cumulative Impact Assessment," prepared in support of this application. That schedule explicitly lists both the Cunalghfadda Wind Farm (Planning Authority Ref. 2660398, now under appeal to An Coimisiún Pleanála as PL16.501853) and this substation (Case VA16.324429) by name and reference number. It does not list the proposed Battery Energy Storage System at Cloonbaul (Mayo County Council Ref. 2660653) anywhere, despite the BESS being made by the same developer, being physically connected to this substation by approximately 220 metres of underground cabling and being located on directly adjoining land. I do not know why the BESS was omitted from this schedule, and I make no assumption as to whether this was an oversight or otherwise. I ask that the Commission require the applicant to explain this omission directly, and to confirm that the combined and cumulative environmental effects of the wind farm, this substation, and the BESS have in fact been fully and properly assessed together, notwithstanding the absence of the BESS from the applicant's own cumulative projects schedule.

6. Archaeological and Cultural Heritage Impact — Mayo Abbey

The proposed site lies within the wider setting of Mayo Abbey, and the true significance of this location warrants setting out in more detail than a general description of "an early Christian ecclesiastical site" conveys. A monastery was founded here around 668–670 AD by St Colman, formerly Bishop of Lindisfarne, for a community of Saxon monks, giving rise to the site's historic name, "Mayo of the Saxons." The settlement is independently documented as early as 731 AD in the Venerable Bede's Ecclesiastical History of the English People, making it one of the earliest Irish ecclesiastical sites to be corroborated in a primary historical source, rather than relying solely on local tradition. The site later became the seat of the medieval Diocese of Mayo, formally recognised at the Synod of Kells in 1152, and the Augustinian abbey ruins that stand today date from approximately 1400. It was this monastic settlement, known in Irish as Maigh Eo (the Plain of the Yew Trees), that gave County Mayo its name during the Composition of Connacht in 1595. The adjoining graveyard remains an active burial ground in continuous use for well over a thousand years and is not merely a historic ruin but a living site of ongoing pastoral and community significance to this day.

Mayo County Council itself recognised this significance in refusing the related wind farm application, describing the site as a very important early Christian ecclesiastical site. The substation and its associated works, access tracks, and grid connection infrastructure risk direct and indirect harm to this sensitive archaeological and cultural landscape, including impacts on the setting and visual context of recorded monuments and previously unrecorded cultural heritage features in the wider area. I do not consider that the application adequately addresses or mitigates this risk, and I request that the Commission's Conservation Officer and archaeological advisors give this matter particular scrutiny, having regard to the wider historic landscape, its continued use as an active place of burial, and not solely to individual monuments.

I note from the applicant's own site layout drawings that the development involves cut and fill earthworks across the site, in addition to tree felling, vegetation removal, and excavation for underground cabling, control building foundations, and access tracks. Ground disturbance of this kind carries a real risk of damaging or destroying undiscovered archaeological material before it is even identified, particularly given the site's location within the wider setting of an early Christian ecclesiastical landscape with over 1,300 years of continuous human activity.

This is not a hypothetical risk. The applicant's own Cultural Heritage chapter identifies specific, named recorded archaeological features within the footprint of the substation itself and its temporary construction compound. A mound, recorded as Site 98 in the 1996 Archaeological Survey of the Parish of Mayo Abbey, is located on a drumlin within the substation site. The applicant's own chapter states that no surface evidence of this mound was found during its site inspection, attributing this to historic quarrying having likely removed it — in other words, the applicant's own assessment records that archaeological evidence on this exact site has already been lost once before. The same chapter also records a well and historic buildings, marked on the 1839 and 1896 Ordnance Survey maps, at the substation location, again with no surface expression today. Separately, and of particular concern, a recorded enclosure with associated field boundary banks, recorded as Site 99 in the same 1996 Archaeological Survey, is located within the substation's own temporary construction compound. The applicant's own text states that, due to the overgrown nature of the area, the full extent and form of this monument is difficult to determine from ground level.

The BESS chapter's own significance assessment for Site 99 records that the internal cable route passes directly through the eastern extent of this monument, and that the remainder will be permanently buried beneath deposited peat and spoil. That assessment concedes this represents a high magnitude of impact and states, in terms, that prior to the application of mitigation, this effect will be significant. I do not accept that permanently burying a recorded monument beneath spoil, while an underground cable is run directly through part of it, can properly be described as preservation in situ. Preservation in situ means leaving a monument undisturbed in its original context; it does not mean covering it with imported material and running services through it. I ask the Commission to treat the applicant's own use of that term here with appropriate scrutiny.

I note that the applicant's own Chapter 14, submitted in support of this very substation application, rates an apparently identical feature — described there as 'CH10,' banks visible in the same field, in near-identical terms — as low sensitivity, with the resulting effect assessed as slight and not significant. This is the opposite conclusion to the applicant's own BESS chapter for what appears to be the same feature. I do not know which of these two assessments, both prepared by or on behalf of the same applicant, is correct. I ask the Commission to require the applicant to explain this inconsistency directly, and to confirm which assessment — if either — can be relied upon. An applicant reaching opposite conclusions about the archaeological sensitivity of the same feature, within its own documentation for this very application and its documentation for a directly linked application, is precisely the kind of risk that fragmented assessment creates.

I am also concerned by the methodology applied to the well, the mound, and the historic buildings referred to above. In each case, the applicant's own assessment concedes a very high magnitude of impact, yet concludes the resulting effect is not significant, on the basis that each site is rated of very low sensitivity precisely because no physical trace of it survives at the surface today. I submit that this methodology is capable of systematically neutralising protection for exactly the kind of buried, undiscovered archaeological material this submission is most concerned to protect: a monument that leaves no surface trace is not thereby a monument of no value and rating it as such risks converting the absence of visible remains into a licence to disturb what actually lies beneath the ground. I request that the Commission scrutinise this aspect of the applicant's methodology carefully, rather than accepting its "not significant" conclusions for these features at face value. I submit that a recorded monument whose true extent has not yet even been established from ground level is precisely the kind of feature that preservation in situ exists to protect, and that a site with a documented history of archaeological loss through quarrying warrants particular caution before further ground disturbance is permitted, rather than less.

I wish to emphasise that archaeological monitoring during construction is not an adequate substitute for avoiding disturbance in the first place. Preservation in situ is the recognised preference in Irish archaeological and heritage policy precisely because, once archaeological material or its surrounding context is disturbed, excavated, or destroyed, it can never be restored. A written or photographic record made during monitoring documents what has been lost; it does not preserve it. Given the exceptional antiquity and documented significance of this landscape, I request that the Commission require the applicant to demonstrate, in the first instance, that the layout of the substation, its access tracks, and its cabling routes have been designed to avoid ground disturbance in archaeologically sensitive areas altogether, with excavation-based mitigation treated as a last resort only where avoidance has been shown to be genuinely impossible, and with a full programme of archaeological monitoring and clearly defined discovery protocols applied wherever avoidance is not achieved.

This is not a hypothetical concern. The M3 Clonee to North of Kells motorway scheme in County Meath, approved by An Bord Pleanála in 2003, provides a stark illustration of what can happen when preservation by record is accepted as sufficient in place of preservation in situ. Construction works led to the discovery of the Lismullin ceremonial enclosure near the Hill of Tara, one of the most significant Iron Age monuments found in the State, which was subsequently excavated and effectively destroyed under a ministerial direction issued under the National Monuments (Amendment) Act 2004, notwithstanding sustained objection from archaeologists, heritage bodies, and the wider public. The European Commission subsequently issued a Reasoned Opinion criticising Ireland's handling of this episode, taking the view that destroying a national monument discovered only after planning permission had already been granted amounted to a material change to the project that ought to have triggered a fresh environmental impact assessment, and that domestic law allowing this to proceed without one was contrary to EU law. That episode remains, to this day, a widely cited example of the irreversible loss that follows once a decision-maker treats excavation and recording as an acceptable substitute for genuine protection, and of the wider legal principle that a project's environmental assessment must keep pace with what is actually discovered

and done on the ground. I respectfully submit that the Commission should not allow a comparable approach to be taken in respect of the historic landscape surrounding Mayo Abbey.

7. Ecological Sensitivity and Appropriate Assessment

This site does not sit in isolation from designated or sensitive natural heritage. Taken together, the following statutory and ecological designations and sensitivities all converge on, or immediately surround, this single site: three separate Natura 2000 sites requiring Stage 2 Appropriate Assessment for the related wind farm (the River Moy SAC, Balla Turlough SAC, and Lough Mask SPA); a High Sensitivity Key Ornithological Receptor on the basis of its nationally important population (Curlew); an internationally important protected species (Otter); confirmed roosts of soprano pipistrelle, common pipistrelle, and brown long-eared bat; recorded Marsh Fritillary habitat, itself an Annex II protected species; peatland habitat; and areas mapped as having High and Extreme Groundwater Vulnerability. This is, by any reasonable measure, an unusually ecologically constrained location for major electrical infrastructure, and I submit that the cumulative weight of these separate designations and sensitivities, considered together rather than individually, ought to weigh heavily against granting permission for further permanent infrastructure at this site.

The wider Cunlaghfadda/Cloonbaul/Knockaunakill/Mayo Abbey area has been identified, in the developer's own environmental assessments prepared for the related wind farm application, as supporting a number of ecologically sensitive species and habitats, including Curlew (identified as a High Sensitivity Key Ornithological Receptor on the basis of its nationally important population), Marsh Fritillary habitat and recorded larval webs, protected bat species including confirmed roosts of soprano pipistrelle, common pipistrelle, and brown long-eared bat, and additional roosting soprano pipistrelle and Leisler's bat recorded near the turbines, Otter (of International Importance), peatland habitats, and areas of High and Extreme Groundwater Vulnerability, including in the vicinity of a proposed borrow pit. The applicant's own Land, Soils and Geology chapter confirms the site is underlain by a Regionally Important Karstified (conduit) Aquifer, a geological formation in which water moves quickly through conduits with comparatively little natural filtration, making contamination risk to groundwater a particular concern at this location. The related wind farm application also required Stage 2 Appropriate Assessment in respect of the River Moy SAC, Balla Turlough SAC, and Lough Mask SPA.

I am concerned that the ecological surveys and mitigation measures submitted in support of this substation application may not adequately reflect the cumulative pressure that the substation, in combination with the wind farm and BESS works, will place on these species and habitats, and I request that the Commission satisfy itself on this point before determining the application.

In particular, I understand the applicant proposes to maintain a dark corridor or unlit zone at the substation site to protect the confirmed bat roosts and associated commuting and foraging routes referred to above. I do not consider that the credibility of this measure has been demonstrated. A dark corridor for bats can only function if it remains genuinely dark, yet this substation compound will itself require security and operational lighting and sits within a wider project that also includes BESS compound lighting, access track lighting, and, most significantly, obstacle and aviation warning lighting likely to be required on the wind turbines and the 36-metre telecommunications tower. I request that the Commission require the applicant to demonstrate, by reference to a proper cumulative lighting assessment covering the substation, the end masts, the telecommunications tower, the BESS, and the wind turbines together, that any proposed dark corridor or unlit zone for bats can actually be maintained in practice, rather than being undermined by light spill from the other lit elements of the same overall project.

I have reviewed the applicant's own pollution prevention and drainage drawings for this substation, which identify watercourse crossings, buffer zones, silt fencing, settlement ponds, level spreaders, and a temporary concrete washout pit associated with the development. The presence of these measures confirms that the applicant itself recognises a real risk of sediment, silt, and construction runoff reaching watercourses in the vicinity of the site. Reliance on silt fencing, settlement ponds, and similar measures is a mitigation-dependent approach, and consistent with the principle in *People Over Wind*, such measures cannot be relied upon to screen out likely significant effects at the assessment stage. I request that the Commission require site-specific, verified evidence that these watercourse crossings and buffer zones will be effective for the full duration of construction and operation, including during periods of heavy rainfall, rather than accepting the presence of standard drainage details as sufficient in itself.

I also note a specific gap in the climate change allowance underpinning the drainage design relied upon for the wider project. The applicant's own Natura Impact Statement confirms that projected climate change effects on rainfall have been modelled only to a mid-century, 2050 timeline. However, the same document confirms the turbines are assumed to have a 35-year operational lifespan. Even allowing for a construction start in the near term, a 35-year operational life extends the development well beyond 2050, potentially to the early 2060s. This leaves a material portion of the development's operational life, including this substation's drainage and settlement pond infrastructure, without the benefit of climate-adjusted rainfall modelling. I request that the Commission require the applicant to justify why the drainage design and associated pollution prevention measures for this substation are adequate for the full operational lifetime of the development, rather than only its first two to three decades.

I further note that day-to-day inspection and monitoring of these drainage and pollution prevention measures is to be carried out by an Environmental Clerk of Works engaged by the applicant, who is responsible for daily inspection, recording, and instructing remedial measures. Compliance monitoring of this kind, carried out by a person engaged and paid by the developer rather than by an independent or statutory body, is not, in my submission, an adequate substitute for independent verification, particularly given the scale of the works and the sensitivity of the receiving environment. This reliance on self-monitoring is a further reason why this development is unsuitable for this location and why permission should be refused.

8. Visual and Landscape Impact

The proposed substation, at approximately 4 acres, together with its associated structures, fencing, lighting, and access infrastructure, will introduce a significant industrial-scale feature into a rural and visually sensitive landscape. Of the three elements of this energy infrastructure project, the nearest to my home is the end mast (structure reference 1493ET 104A), sited directly behind my home and nearer to my home than Turbine T6 itself, which is approximately 658 metres away. The BESS and the substation compound are also sited behind my home. A 16-metre lattice structure carrying overhead conductors, sited this close behind my home, will be a prominent and unavoidable feature of my immediate outlook, not a distant one. I will experience direct and substantial visual impact from this development. I do not consider that the landscaping and mitigation measures proposed are sufficient to address this impact, particularly when the substation and end masts are viewed together with the wind farm and BESS proposals for the same general area.

I am particularly concerned by two elements of the development that, in my submission, have not been given sufficient weight in how this application is likely to be perceived: a telecommunications tower approximately 36 metres in height, and two 110kV end masts approximately 16 metres in height, as shown on the applicant's own elevation drawings. A 36-metre tower is a very substantial structure in a low-lying rural landscape, comparable in height to a ten-storey building, and will be visible over a wide area independent of the substation compound itself. I also note that the development involves tree felling and vegetation removal, which will directly reduce the existing natural screening around the site, further increasing the visibility of the compound, the end masts, and the telecommunications tower from my home and from the surrounding area, at the same time as removing hedgerow and treeline habitat relevant to the ecological concerns set out at Section 7 below.

I do not consider that the application materials make it easy for an ordinary member of the public to establish the actual distance from these individual tall structures to the nearest dwellings. The application provides distance figures for the substation compound (H003, approximately 314 metres) and the underground cabling (H006, approximately 223 metres), but no equivalent figure for either individual end mast. This is despite the nearest end mast being sited directly behind my home. I request that the Commission require the applicant to provide a clear, explicit table of distances from each individual structure — the substation compound, each end mast, and the telecommunications tower — to every noise- and visually-sensitive property within at least 1 kilometre, so that the Commission and the public can properly assess the true proximity of what is proposed.

I am also concerned about the loss of dark night skies as a genuine rural amenity, separate from the ecological bat-corridor concern raised at Section 7 above. This is a quiet, unlit rural area at present. The substation compound, its lighting columns and lightning masts, the BESS compound lighting, the access track lighting, and any obstacle or aviation warning lighting required on the end masts, telecommunications tower, and wind turbines will together introduce a substantial and permanent new source of artificial light into a landscape that currently has very little, fundamentally and irreversibly changing the character of the area for those of us living nearby. This is a further reason why I consider this development unsuitable for this location and why permission should be refused.

The developer's own cumulative photomontage, prepared for the related wind farm application and attached as Appendix B, confirms that the view from the immediate vicinity of my home will include multiple turbines simultaneously in a single sightline, together with the wider project infrastructure. This is not a marginal or occasional view. It is the direct outlook from my home, and it will be a permanent feature of my daily life for the lifetime of the development. I do not consider that an assessment which treats the substation's own visual footprint separately from this cumulative turbine view gives the Commission, or the public, an accurate picture of the true visual impact I will experience. The scale of this cumulative exposure is illustrated by the proximity of individual turbines to my home: T6 is approximately 658 metres away, T7 approximately 733 metres, T4 approximately 897 metres, and T2 approximately 980 metres. This represents a very large number of turbines concentrated within, or barely beyond, a kilometre of a single home, not a distant or occasional presence on the horizon. As set out in Section 11 below, I have a documented medical history of intermittent vertigo, and a pre-existing clinical condition of this kind threatens my ability to live safely in my own home given this level of surrounding turbine and grid infrastructure. A sightline that includes the continuous rotating motion of multiple wind turbine blades is a recognised trigger for symptom flare-ups in some vestibular conditions. I reject in advance any suggestion by the applicant that impacts of this kind — including reports of dizziness or anxiety experienced by residents living near turbines — should be dismissed or reframed as a psychological stress response rather than a genuine, clinically documented physical vulnerability. My condition is diagnosed and documented in writing by my treating doctor; it is not a subjective reaction to the proposal, and I ask the Commission to have particular regard to it when weighing the cumulative visual impact of the substation, the wind farm, and the BESS as experienced from my home.

9. Noise Impact

110kV substations generate continuous operational noise, principally transformer hum, which is audible at considerable distances, particularly at night when background noise levels are lower. The nearest of the three elements of this project to my home is the end mast, sited directly behind my home and nearer to my home than Turbine T6, which is approximately 658 metres away. The BESS and the substation compound are also sited behind my home. I am concerned that the noise assessment submitted may not adequately reflect real-world conditions at any of these locations, and that residential amenity — including sleep disturbance — will be adversely affected. This is a further reason why this development is unsuitable for this location and why permission should be refused.

I am also able to confirm that my home is the property identified as "Location B" in the developer's own background noise monitoring survey for this project. The applicant's own noise chapter (Table 12-6) explicitly identifies "Loc B" as corresponding to "H004" — this is not an inference on my part, but a fact stated directly in the applicant's own document. My home is therefore not a hypothetical or generic nearby dwelling for the purposes of this assessment: it is one of only five locations the developer's own consultants selected as representative reference points for the entire background noise survey underpinning this application.

I wish to raise two further concerns regarding the background noise survey conducted at my home. The survey period at Location B ran from 22 June 2023 to 1 August 2023, a period of approximately six weeks in early to mid-summer. I did not live at this property at the time of that survey; I purchased it in May 2025, and my family and I did not move in until 19 December 2025. My knowledge of conditions at the property during the survey period is therefore based on the applicant's own documentation, not personal recollection. At the time this survey was conducted, hedging and vegetation around my home was considerably more substantial than it may be in future, and would have provided a meaningful degree of acoustic screening from surrounding ambient noise sources. This is visible in the applicant's own photographic record of the monitoring installation, Appendix 12-3, Figure B-2 (Location B Installation), which shows the noise monitoring equipment positioned close to trees and hedging at my home. This substation development itself involves tree felling and vegetation removal, as set out earlier in this submission. I am concerned that a background noise baseline recorded behind a level of natural screening that this same development proposes to remove does not reliably represent the noise environment my home will actually experience once that vegetation is gone, and I ask that the Commission require the applicant to address this directly.

Separately, I am concerned that a six-week summer survey period may not adequately represent noise and wind conditions typical of the West of Ireland across a full year. I ask the Commission to have this addressed, given that wind conditions in this region are not evenly distributed across the seasons.

I am the resident at noise-sensitive location H004. On the developer's own predicted wind farm turbine noise figures, H004 is not a marginal or interchangeable receptor for turbine noise: at every wind speed assessed, the

predicted turbine noise level at H004 is higher than at the neighbouring receptor H003. At the higher wind speeds assessed, for example, the predicted turbine noise level at H003 is 38.5 dB(A) against a night-time criterion of 43 dB(A) — a margin of 4.5 dB — whereas the predicted level at H004 is 40.6 dB(A) against the same criterion, a margin of only 2.4 dB. H004 is therefore the more noise-exposed of the two receptors for turbine noise specifically, and operates with a materially tighter compliance margin, particularly at night, on the developer's own figures. I further note that the applicant's own turbine noise assessment expressly identifies its predicted noise results table as covering only the 15 noise-sensitive locations with the highest predicted wind turbine noise levels across the entire project, stating that all other locations are predicted to experience turbine noise below 40 dB. H004 appears within that table of the 15 highest predicted locations; H003 does not. My home is therefore, on the applicant's own assessment, among the fifteen most turbine-noise-affected properties associated with this entire wind energy project, not merely a receptor that happens to be somewhat higher than one neighbour.

Turning to the substation and grid connection noise chapter specifically, I note that the applicant has identified H003, at approximately 314 metres, as the nearest noise-sensitive location to the substation compound for construction noise purposes, with a predicted level of 53 dB LAeq,T against a stated significance threshold of 65 dB. The applicant has separately identified H006, at approximately 223 metres, as the nearest noise-sensitive location to the underground grid connection cabling works. I do not take issue with the identification of the nearest receptor to each of these specific elements as such. What I do take issue with is that no equivalent nearest-receptor identification, and no equivalent predicted noise assessment, appears to have been carried out for the two proposed 110kV end masts individually, despite the nearest end mast being sited directly behind my home. I request that the Commission require the applicant to identify the nearest noise-sensitive location to each individual end mast, and to provide a predicted noise assessment for that location covering both construction and, importantly, operational noise, including any audible or corona noise associated with energised 110kV overhead conductors and end mast apparatus, particularly during wet weather.

I note that an operational noise assessment for the substation itself has also been carried out, separate from the construction figures referred to above. The applicant's noise chapter states that the predicted operational noise level from the substation at the nearest NSL, H003, approximately 366 metres to the northwest, is 30 dB LAeq,T, against a night-time criterion of 35 dB LAeq,T applied specifically to the substation given its 24-hour operation — a margin of only 5 dB. I do not take issue with the assessment having been carried out at H003 as the nearest receptor to the substation building itself. However, no equivalent operational noise figure has been provided for H004, or for either end mast, despite H004 being one of the fifteen most turbine-noise-affected properties associated with the wider project and despite my home's particular proximity to the end masts specifically. A 5 dB margin at the nearest assessed receptor is not, in my submission, a basis for assuming a comparable or greater margin holds at every other noise-sensitive property in the vicinity. I request that the Commission require the applicant to provide equivalent operational noise figures for H004 and for the nearest noise-sensitive location to each individual end mast.

More fundamentally, I do not consider that an assessment of substation noise alone is adequate. This substation and its end masts cannot properly be assessed in isolation from the noise arising from the wind farm they are designed to serve, or from the proposed Battery Energy Storage System to which the substation is directly connected by underground cabling. Given that H004 already operates within only 2.4 dB of the applicable night-time criterion on wind farm turbine noise alone, the addition of continuous substation transformer hum, end mast noise, and BESS operational noise at or near the same receptor is of real concern and must be properly quantified, not assumed to be insignificant. I request that the Commission require a single, combined noise assessment addressing the cumulative operational and construction noise of the substation, the end masts, the wind farm, and the BESS together, modelled explicitly at H004 and at the nearest noise-sensitive location to each individual end mast, rather than assessing each element as though it existed in isolation from the others.

In *Balz v An Bord Pleanála* [2019] IESC 90, the Supreme Court held that the Board had erred in failing to engage adequately with submissions that noise guidance relied upon was outdated, rather than simply treating such submissions as irrelevant. I request that the Commission engage directly and substantively with the noise concerns raised in this and other submissions, including the receptor-specific and cumulative impact concerns set out above, rather than relying solely on compliance with existing guidance without further scrutiny.

10. Adequacy of Public Notification and Consultation

I am concerned that the level of public awareness and consultation surrounding this substation application, and the wider Cúnlaghfadda/Cloonbaul energy infrastructure project as a whole, has not been proportionate to its scale and potential impact. In particular, residents were only made aware of the developer's intention to apply for a Battery Energy Storage System at the same location when a site notice was erected on 14 August 2026, despite this forming part of the same overall project as the substation and wind farm. As the High Court held in *North Westmeath Turbine Action Group v An Bord Pleanála* [2025] IEHC 367, public notification is a requirement for a valid environmental impact assessment, and where a wind farm and its grid connection must be assessed together, a public notice that does not refer to the full project fails to properly notify the public and undermines the validity of the assessment process. Residents are entitled to understand the full, long-term picture for this area before, rather than after, individual elements of it are permitted. In direct response to these concerns, and entirely independently of the applicant, the local community itself organised a community meeting and submission clinic on 17 August 2026, precisely because the applicant's own consultation had left residents feeling inadequately informed.

11. Personal Medical Circumstances

I moved with my family from the town of Claremorris to this rural location on 19 December 2025, precisely because of my hearing condition, in order to live in a quiet environment away from the noise of a busy town centre. This was not an incidental choice of address; it was a recent and deliberate decision made for the specific medical reasons set out below, and my family and I have only just begun to build the quiet life we sought at this home before this development was proposed. I hold a letter from my treating doctor advising against my continued residence in proximity to noise-generating equipment, construction activity, or development of this nature. My doctor's letter states:

"The above named lady has a background history of hearing deficit, otosclerosis and intermittent vertigo and to that end, I would not advise or recommend her to live within the environs of any noise generating equipment or constructions."

— Dr Éadaoin Townley, MCRN 023187, Townley Medical Practice, Ballyhaunis Road, Claremorris, Co. Mayo, letter dated 15 May 2026 (attached as Appendix A).

It is a matter of real personal injustice to me that the very qualities that led my family to choose this location — it's quiet, its distance from noise-generating development — are now directly threatened by this proposal. I did not move to escape noise in one place only to have industrial-scale noise-generating infrastructure brought to my door in another.

This medical evidence is directly relevant to my objection given the construction-phase and long-term operational noise associated with this 110kV substation, its end masts, and the associated BESS, including transformer hum, and given my home's close proximity to all three elements of this project, each of which is sited behind my home, with the nearest end mast closer to my home than Turbine T6 itself. It is also relevant beyond noise: as set out in Section 8 above, my home's outlook includes a direct sightline to multiple wind turbines in the cumulative photomontage prepared for the related wind farm application. The continuous rotating motion of turbine blades within a fixed sightline is a recognised trigger for symptom flare-ups in some vestibular conditions, including intermittent vertigo of the kind documented in my doctor's letter. I respectfully request that the Commission have specific regard to this medical evidence in its assessment of both noise impact and visual/landscape impact on residential amenity, and I attach my doctor's letter as Appendix A to this submission.

12. The Precautionary Principle

The precautionary principle is an established principle of environmental and planning decision-making and is particularly relevant where uncertainty exists as to the potential impacts of a proposed development on sensitive environmental, archaeological, and residential receptors. Its force here does not rest on any single ground raised in this submission. It rests on the cumulative weight of uncertainty and risk arising across almost every issue addressed above.

Considered together, the following give rise to real and continuing doubt as to whether this development can be safely, lawfully, and appropriately permitted at this location: the developer's own admission that this substation exists only to serve a wind farm that has been refused by Mayo County Council and remains under appeal; the fact

that the substation, its end masts, and the associated BESS have been advanced through three separate approval processes rather than assessed as the single project the developer's own documents describe them as; the absence of any distance table, or dedicated noise or lighting assessment, for the individual structures nearest to residents, including the end mast, sited directly behind my home and nearer to it than Turbine T6 itself, and closer than any noise-sensitive location the applicant has itself assessed; the developer's own figures placing my home among the fifteen most turbine-noise-affected properties associated with the entire project, operating within only 2.4 dB of the applicable night-time criterion before any substation, end mast, or BESS noise is added; the concentration of four turbines within, or barely beyond, a kilometre of my home; the presence of three Natura 2000 sites, confirmed bat roosts of multiple protected species, Marsh Fritillary habitat, Otter, and Curlew of national importance, all within or adjoining this single site; the location of this development within the historic setting of Mayo Abbey, independently documented since 731 AD and still in active use as a place of burial; the credibility gap between a proposed dark corridor for bats and a project that will introduce substantial new lighting from every other element of the same site; a drainage design whose climate change allowance does not cover the full operational lifetime of the development; and reliance on the applicant's own retained Clerk of Works, rather than independent monitoring, to oversee compliance with all of the above.

No single one of these matters may, in isolation, be considered sufficient to warrant refusal. Taken together, they represent a level of unresolved risk, uncertainty, and cumulative burden that the precautionary principle requires to be resolved in favour of protecting the receiving environment, the historic landscape, and every family and neighbour living within this area, not my own household alone. I do not consider that deferral, or the imposition of conditions, is an adequate response to uncertainty of this breadth and depth. I submit that the precautionary principle, properly applied to the cumulative picture presented by this application, requires the outright refusal of permission for this substation.

Conclusion and Relief Requested

For the reasons set out above, I do not want this industrial energy infrastructure — the substation, its end masts, the telecommunications tower, and the wider wind farm and battery storage project it forms part of — built beside my home and my family, or beside the homes and families of the several hundred neighbouring households identified in the applicant's own mapping. All of us living in this area are entitled to have our homes and our families protected from the cumulative burden this project represents. I respectfully but firmly request that An Coimisiún Pleanála refuse permission for this development.

The proposed substation is not a stand-alone development but an essential and legally inseparable component of the wider wind energy and battery storage project now before the planning system. To grant permission for it separately risks impermissible project-splitting, inadequate environmental and Appropriate Assessment, and inadequate public participation, contrary to the principles established in *O'Grianna v An Bord Pleanála* [2014] IEHC 632 and *North Westmeath Turbine Action Group v An Bord Pleanála* [2025] IEHC 367.

If, notwithstanding the foregoing, the Commission is not minded to refuse permission outright, I request, at an absolute minimum, that it defer determination until the related wind farm appeal and the BESS application can be assessed alongside it as one integrated project, require a single, combined cumulative noise assessment modelled explicitly at receptor H004, and have specific regard to the medical evidence set out at Section 11. For the reasons set out at Section 12 above, I do not consider that conditions attached to a grant of permission would adequately address the cumulative risks and uncertainties raised in this submission.

I trust the Commission will give full and careful consideration to the matters raised in this submission.

Yours faithfully,

Karen Morley
29 August 2026

Appendices

Appendix A — Letter from treating doctor.

Appendix B — Developer's cumulative photomontage, showing view of proposed turbines from the vicinity of the observer's home (extracted from the EIR prepared for the related wind farm application)

Appendix C — Extract of the developer's noise-sensitive receptor mapping (Appendix 12-4 of the applicant's own documentation), showing individual dwellings identified from H001 to beyond H340 surrounding the site.

Appendix A — Letter from Treating Doctor

TOWNLEY | Medical Practice

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15/05/2026

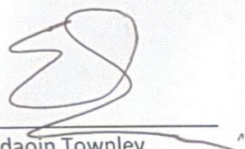
To Whom It May Concern

RE Ms Karen Morley of Knockaunakill, Mayo Abbey, CLAREMORRIS, Co. Mayo, DOB 29/01/1972, Tel 09493 62619 /
087 966 4295, GMS: R186570A

Dear To Whom It May Concern,

The above named lady has a background history of hearing deficit, otosclerosis and intermittent vertigo and to that end, I would not advise or recommend her to live within the environs of any noise generating equipment or constructions.

Yours faithfully,



Dr. Éadaoin Townley,
MCRN: 023187

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Appendix B — Cumulative Photomontage

Developer's cumulative photomontage, showing view of proposed turbines from the vicinity of the observer's home (extracted from the EIAI prepared for the related wind farm application).



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