

Kevin Jennings
Knockaunakill, Co. Mayo
30/08/2026

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

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

Dear Sir/Madam,

I wish to lodge this observation objecting to the above-referenced Strategic Infrastructure Development application, made under Section 182A of the Planning and Development Act 2000, as amended. The €50 fee accompanies this submission.

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

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

2. Archaeological heritage. The site overlaps and affects an enclosure identified in the 1995 Mayo Abbey archaeological survey as being of "immense importance," potentially prehistoric or Neolithic in date. The applicant's assessment appears to rely on desk-based research and visual inspection rather than geophysical or topographical survey. This is not sufficient to fully understand and document the local environment and where historical sites of significance come to light after the start of such projects - when it is too late to preserve in-situ and fully retain the significance for future generations.

3. Landscape and heritage precedent. Mayo County Council's refusal of the connected wind farm (P26/60398) found this site lies within Landscape Sensitivity Policy Area 4 of the Mayo County Development Plan 2022–2028, on a designated scenic route with a protected view, and that development here would undermine the setting of Mayo Abbey. A permanent 110kV substation compound introduces the same industrial impact into the same sensitive landscape, and its capacity to host further infrastructure, as the BESS confirms, compounds that impact. One factor in considering where to build our long-term family home, relocating home from the USA was living in a location of natural beauty and scenic importance. This application, along with the other planned infrastructure will diminish that goal significantly, if not eliminate entirely.

4. Ecology. The site supports wintering Whooper Swan, Golden Plover and Snipe, and breeding Curlew, a Red-listed species. The ecological assessment relies substantially on the Bird Atlas 2007–2011, now outdated, and appears to undervalue declining species such as Meadow Pipit and Kestrel. The site's cutover bog, raised bog remnant and species-rich wet grassland are amongst Ireland's most depleted habitats and warrant protection under the precautionary principle in Article 6(3) of the Habitats Directive (92/43/EEC) and the EU Nature Restoration Regulation (2024/1991). Having such wildlife on our doorstep and preserving these birds and wildlife for future generations is important - as now a local landowner, I take this responsibility seriously and those efforts will be in vain if at the same time, we facilitate industrialization of this size in small communities rich with natural diversity. It will be too late to realise we have permanently adjusted the birds natural habit once the building is complete. Together my husband and I will be striving to ensure our local wildlife have a home and place for as long as we are able to maintain in its natural form.

5. Water, drainage and karst. Foundations, hardstanding, cable trenches and drainage works risk altering surface water runoff and creating pollution pathways to groundwater in this karst landscape, contrary to the objectives of the Water Framework Directive (2000/60/EC). We have witnessed this at first hand: local road L-55362 becomes impassable in moderate rain conditions, and the enclosed map marks three locations known to flood near the local farm buildings, the fields toward Kilbride, and near the Monaghan Bros premises. The swallow holes serving these fields cannot cope with heavy rainfall as it is; further hard standing and altered drainage would add to that burden. When flooding, closes roads, damages fencing and fields - our lives are impacted daily, rerouting journeys, farming and leisure. The addition of this level of infrastructure will further compound this challenge - and no one from this enterprise and company will be impacted to the same extent.

6. Noise, lighting and fire risk. Transformer noise, permanent security lighting and the fire and emergency-response profile of high-voltage infrastructure would affect a dark, quiet rural area. The applicant's own subsequent BESS announcement, with fire-water tanks and an 18m lightning mast at the same site, means these effects should be assessed cumulatively, project by project. Our home under construction has its living area facing Croagh Patrick; the substation's lighting and fencing would bring light pollution to a rural setting that is currently dark and quiet. Our land nearby that our wider family might otherwise consider for a future home will no longer be suitable, given proximity to a substation, battery storage facility and wind turbines.

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

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

Yours faithfully,

Kevin Jennings