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To:
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Re: ACP Reference 324429 – Proposed 110 kV Substation
Applicant: Cunlaghfadda Green Energy Limited
Submission / Objection

Dear Sir/Madam,

I wish to formally lodge an objection to the proposed 110 kV substation development under ACP Reference 324429.

I am a resident of the local area and live close to the proposed development. I am not opposed to renewable energy in principle, but I believe infrastructure of this scale must be appropriately located and its effects on nearby residents, the environment and the surrounding rural area fully assessed.

My principal concerns are set out below.

1. Flooding and Surface Water Drainage

The surrounding area contains wet and poorly drained peat and drumlin ground. As a local resident, I am concerned that the construction of a large substation compound, access roads and associated hardstanding could alter existing drainage patterns and increase surface-water runoff.

The proposed substation compound alone represents a substantial area of hardstanding. This could reduce the natural ability of the ground to absorb rainfall and result in water moving more quickly towards surrounding and downstream areas.

Although drainage measures such as swales, settlement ponds and attenuation features are proposed, I am concerned about whether these systems have sufficient capacity during prolonged or extreme rainfall.

Clear evidence should be provided demonstrating that the development will not increase flood risk to nearby homes, land, roads or businesses, particularly having regard to more intense rainfall associated with climate change.

2. Groundwater, Peat and Water Quality

The proposed works involve significant excavation for the substation, underground cabling, foundations and associated infrastructure.

The area includes peatland and vulnerable groundwater conditions. Excavation, peat removal and dewatering could alter natural groundwater and surface-water pathways and increase the risk of sediment or pollutants entering nearby drains and watercourses.

I am particularly concerned about disturbance of deep peat and the potential consequences for peat stability, water quality and downstream habitats.

The applicant should demonstrate that construction and operation of the substation will not adversely affect local groundwater, watercourses or the wider Robe, Meander and River Moy catchments.

3. Ecology and Habitats

The surrounding area contains environmentally sensitive habitats and supports a range of wildlife.

Construction of the substation, underground cabling, access routes and associated infrastructure may result in habitat loss, vegetation removal and changes to existing drainage conditions.

There are concerns regarding protected and sensitive species in the wider area, including Curlew, bats and Marsh Fritillary.

Lighting associated with the operational substation and telecommunications infrastructure could also affect bats and other nocturnal wildlife.

Any ecological mitigation proposed should be clearly demonstrated to be effective and should not simply rely on replacement or enhancement habitat elsewhere where existing habitat is being directly lost.

4. Residential Amenity

As a nearby resident, I am concerned about the impact that a large electrical substation and associated infrastructure could have on the residential amenity of the area.

Construction would involve excavation, heavy machinery, traffic, noise, dust and vibration over a prolonged period.

Once operational, the potential noise associated with transformers and other electrical equipment also needs to be properly assessed, particularly during quieter evening and night-time periods.

The development should be assessed having regard to the people who already live in the area and their reasonable expectation of maintaining the existing rural character and amenity of their surroundings.

5. Landscape and Visual Impact

The proposed development includes a substantial substation compound together with telecommunications infrastructure, end masts, cabling and associated works.

This would introduce significant industrial-scale electrical infrastructure into an otherwise rural landscape.

The visual impact of this development should also be considered cumulatively with the proposed Cunlugh Fadda wind farm and its associated turbines, met mast, access tracks and other infrastructure.

Taken together, these developments would result in a substantial change to the character and appearance of the local area.

6. Construction Traffic, Noise and Road Impacts

Construction of the substation is likely to involve significant movements of heavy vehicles, construction equipment and materials on local rural roads.

I am concerned about the effect this could have on road safety, road surfaces and residents through increased traffic, noise, dust and vibration.

Local roads were not originally designed to accommodate sustained volumes of heavy construction traffic.

Any proposed road widening, hedge removal or tree removal would also have a permanent effect on the rural character of the area.

7. Cumulative Impact with the Proposed Wind Farm

Although this application relates to the 110 kV substation and associated infrastructure, it is directly connected with the wider proposed Cunlagh Fadda wind farm.

In my view, the environmental and residential effects of the substation should therefore not be considered in isolation.

The cumulative development would include seven wind turbines, a met mast, the substation compound, underground cabling, telecommunications infrastructure, access roads and associated construction works.

The combined impacts on residents, drainage, water quality, ecology, traffic and the landscape are considerably greater than those of the substation considered on its own.

Conclusion

As a resident living close to the proposed development, I have significant concerns regarding the potential effects of the proposed 110 kV substation.

These concerns include:

- Increased surface-water runoff and potential flood risk.
- Impacts on groundwater, peat and local water quality.
- Disturbance and loss of sensitive habitats.
- Effects on protected species and local wildlife.
- Construction noise, dust, vibration and heavy traffic.
- Operational noise from electrical infrastructure.
- Significant landscape and visual impacts.
- The cumulative impact of the substation together with the proposed wind farm and associated infrastructure.

Given the scale and location of the development, I do not believe that the potential environmental and residential impacts have been adequately addressed.

I therefore respectfully request that An Coimisiún Pleanála refuse permission for the proposed development under **ACP Reference 324429**.

Yours faithfully,

Liam Anthony Rushe