

OBSERVATION ON STRATEGIC INFRASTRUCTURE DEVELOPMENT APPLICATION

Case reference

An Coimisiún Pleanála Ref. 324429

Applicant

Cunlaghfadda Green Energy Ltd.

Development

Proposed

110 kV substation, loop-in grid connection and two lattice end masts at Cloonbaul, Co. Mayo

Observer

Maureen Mc Namara, 26 Elmvale, Wilton, Cork, T12 CDX9

I wish to make an observation objecting to this application. I am a speech and language therapist and, through my work, I see how health, communication, routine and access to calm outdoor spaces affect people's wellbeing, particularly children, older people and those with sensory or additional needs. My objection therefore focuses on the effect of the proposed development, together with the wind farm and battery storage it serves, on health, daily life and the natural environment.

1. Human health, residential amenity and enjoyment of life

The substation is not a neutral piece of infrastructure. It would introduce a large industrial compound, transformers and two lattice masts into a quiet rural area and would operate alongside seven proposed turbines and a battery storage facility. The applicant's material models the 110 kV substation as a continuous tonal noise source, while the wider wind-farm assessment predicts that 40 homes would exceed the shadow-flicker guideline unless turbines are shut down by control systems. In my professional experience, persistent noise, visual movement and disruption of a quiet environment can be especially difficult for people who rely on predictable and low-stimulation surroundings. The combined effect on sleep, concentration, communication, outdoor activity and ordinary enjoyment of the home has not been properly assessed. A development whose acceptability depends on sensors, software and continuing curtailment over its operating life is not appropriately sited.

2. Damage to habitats and wildlife

The applicant's own surveys identify Annex I Molinia meadows and transition mire/quaking bog, Marsh Fritillary larval webs, a probable breeding pair of Curlew, Whooper Swan and four bat species. The biodiversity assessment accepts potential significant effects on Marsh Fritillary at county scale, and on transition mire through habitat loss and drainage, before mitigation. These are not abstract environmental assets. Healthy wetlands, birds, pollinators and other wildlife support the character of the area and the community's ability to experience and enjoy nature. Drainage,

excavation, dust, lighting, noise and habitat fragmentation from the substation and the connected works risk lasting damage. Proposed habitat management or replacement cannot be treated as equivalent to avoiding harm to established habitats in the first place.

3. Project splitting and incomplete cumulative assessment

This substation is one part of the applicant's own "Cunlaghfadda Green Energy Project", comprising the seven-turbine wind farm, this substation/grid connection and a battery energy storage system. The three elements are physically and functionally connected and should be assessed as one project. Instead, they have been divided across three applications and two decision-makers. The Commission's inspector specifically warned that the substation EIAR should not merely replicate the wind-farm EIAR and that all cumulative impacts, including the wind farm, should be identified. Nevertheless, the substation water chapter, Water Framework Directive assessment and surface-water plan reuse the wind-farm documents and report numbers, while omitting the battery storage. The result is neither a proper assessment of the substation's own effects nor a complete assessment of the whole project. This fragmentation also prevents the public from considering the combined health, amenity and ecological effects in one coherent process.

Request

For these reasons, I respectfully request that permission be refused. In the alternative, the Commission should not determine this application in isolation and should require a complete, project-wide environmental and cumulative assessment of the wind farm, substation/grid connection and battery storage together, with a fresh opportunity for public comment before any decision is made.

Maureen Mc Namara Date: 28.08.26
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