

FORMAL SUBMISSION / OBJECTION

Cunlaghfadda 110 kV Substation

Local resident submission: premature project splitting and flooding risk

Submitted to	An Coimisiún Pleanála
Reference	VA16.324429
Submitted by	Michael and Anne Prendergast
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To the Commissioners of An Coimisiún Pleanála:

We, Michael and Anne Prendergast of Cloondroon, Claremorris, object to the proposed 110 kV substation, loop-in grid connection and associated works at Cloonbaul. Our family has lived and farmed in this area for generations. Michael is a farmer and pedigree Simmental breeder, giving us a direct and lasting interest in the protection of agricultural land, water, local roads and rural amenity. We support renewable energy in principle, but not on an inappropriate and environmentally sensitive site. The proposed substation is an enabling component of a wider energy development being advanced through separate applications, and it should not be approved before the whole project and its cumulative flooding implications have been resolved.

Request: refuse approval under case VA16.324429. At minimum, no approval should issue while the connected wind-farm appeal and Cloonbaul BESS application remain unresolved and the combined hydrological effects have not been established.

The substation is not a genuinely independent project

The application documents identify the purpose of this infrastructure as connecting the proposed Cunlaghfadda Wind Farm to the national grid. The same documentation defines the wind farm and grid connection together as the proposed project, even though they are being pursued through separate consent routes. The substation's location, capacity, design and asserted public benefits are therefore tied to the generating project it is intended to serve.

Without the wind farm, the need for this particular onsite substation at Cloonbaul is fundamentally altered. Conversely, approving the substation would create a major planning and physical foothold for the refused wind farm or a reconfigured energy complex. That is why the enabling infrastructure cannot fairly be considered first and in isolation.

This is a concrete project-splitting problem

Mayo County Council refused the wind-farm application, reference 2660398, on 14 July 2026. That decision is now under appeal under ACP reference PL-501853-MO-26. The proposed Cloonbaul BESS is separately before Mayo County Council under reference 2660653. Three authorities or procedures are therefore being asked to decide interdependent or closely related parts on different timelines, before the final form and viability of the overall development are known.

The concern is not that every infrastructure component must always appear in one application. It is that the chosen sequence must not deprive environmental assessment of practical effect. The public and the decision-maker must be able to see the whole development, test its cumulative impacts, examine reasonable alternatives and retain a genuine option to refuse or relocate it before any key component is fixed.

Friends of the Irish Environment has raised the same salami-slicing concern in this case. That concern is well founded. A shared EIAR cannot cure a process in which the actual decisions remain fragmented and one approval may prejudice the next.

EU law requires an overall and cumulative assessment

The Court of Justice has repeatedly held that the objective of the EIA Directive cannot be circumvented through project splitting. The European Commission's 2021 guidance explains that where projects taken together may have significant effects, their environmental impact should be assessed as a whole and cumulatively. The assessment must cover not only direct construction effects but also the environmental consequences of the completed and operating project.

For VA16.324429, that requires a combined plan and assessment of the substation, loop-in works, wind farm, BESS, access routes, trenches, drainage, compounds, peat and spoil handling, lighting, traffic and decommissioning. Each component cannot be assessed against an artificial baseline in which the others are treated as uncertain, future or external.

Approval now would be premature and prejudicial

The Commission should not authorise grid infrastructure whose principal generating project has been refused and remains under appeal. If the appeal is dismissed, the stated justification and proportionality of this substation require fresh examination. If the wind farm is redesigned, the appropriate grid solution, capacity, route and site may also change. If the BESS proceeds, the combined footprint, drainage and emergency arrangements change again.

Approval at this stage would therefore risk locking the community into a particular grid location before the project it serves has achieved a final lawful form. The correct sequence is to determine the acceptability of the whole energy development and then assess the infrastructure actually required by that consented scheme.

Flooding evidence must be assessed across the complete scheme

The area already experiences real flooding. Local photographic evidence records flooding in November 2024 and in eastern Knockaunakill in January 2026, including disruption of access to homes and farms. A local swallow hole receives a stream linked with the proposed development area. This is important evidence of an active karst drainage system and of possible rapid connection between surface water and groundwater.

The substation would introduce substantial hardstanding, foundations, cable trenches, access works and engineered drainage. Those works cannot be modelled meaningfully without including the wind farm's turbine bases, roads, hardstands, cabling and peat disturbance and the BESS's further compounds, foundations, roads and drainage. The combined scheme may change both the volume and timing of runoff and may redirect water towards already vulnerable receptors.

The existing assessment should not be accepted unless it demonstrates, through one integrated catchment and hydrogeological model, that the whole development will not worsen flood depth, duration, frequency or access disruption. That model should be calibrated against the observed 2024 and 2026 events, investigate the swallow hole and subsurface pathways, include extreme-rainfall and climate allowances, and test construction-phase failures such as blocked drains, exposed peat and incomplete attenuation.

Where karst pathways are present, conventional attenuation calculations alone may be insufficient. The Commission requires site-specific evidence on infiltration, groundwater connectivity, water quality and downstream receptors before permission, not a condition requiring the developer to refine drainage after the location has already been approved.

The fragmented approach also weakens alternatives and heritage protection

A proper alternatives assessment should compare options for the entire wind-generation, storage and grid arrangement. Assessing the substation alone tends to privilege the developer's chosen connection point while excluding alternatives that might emerge if the wind farm were refused, reduced, relocated or redesigned. Engineering convenience and a shorter cable route do not establish that this sensitive location is environmentally optimal.

The site also lies within the wider Mayo Abbey archaeological landscape and overlaps or affects the area associated with recorded site MA101-106, described in the 1995 survey as being of immense importance. Archaeological risk, hydrology and habitat cannot be allocated neatly to separate red-line boundaries. Roads, trenches, compounds, spoil areas and drainage may affect the relationships and setting of features beyond the permanent substation footprint.

Key sources relied upon

- Directive 2011/92/EU on environmental impact assessment, as amended by Directive 2014/52/EU.
- European Commission, Guidance on the application of the EIA Directive to changes and extensions of projects (2021), section 2.2.3: splitting of projects.
- Court of Justice of the European Union: Case C-142/07, Ecologistas en Acción-CODA; Case C-205/08, Umweltanwalt von Kärnten.
- Cunlaghfadda 110 kV substation and grid-connection application and EIAR, ACP case VA16.324429.
- Cunlaghfadda Wind Farm appeal, ACP ref. PL-501853-MO-26; Mayo County Council ref. 2660398.
- Cloonbaul BESS planning application, Mayo County Council ref. 2660653.
- 1995 Mayo Abbey Archaeological Survey, including recorded site MA101-106.
- Local photographic evidence of flooding in November 2024 and January 2026 and evidence concerning the Knockaunakill swallow hole and connected stream.

Conclusion

For the reasons set out above, we respectfully request that the proposal be refused. The planning system should assess the whole energy development, its complete footprint and its combined hydrological and environmental effects before any individual enabling component is permitted.

Yours faithfully,

Michael and Anne Prendergast

Date: 30 August 2026