

SUBMISSION / OBSERVATION TO

AN COIMISIÚN PLEANÁLA

Proposed Cunlaghfadda Green Energy Project – 110 kV Grid Connection

Direct application under section 182A of the Planning and Development Act 2000 (as amended)

Applicant	Cunlaghfadda Green Energy Limited
Location	Townland of Cloonbaul, County Mayo
Commission reference	An Coimisiún Pleanála - Case reference: VA16.324429
Observer	Teresa Boyle
Observer address	Currykirwan, Mayoabbey, Claremorris, Co. Mayo
Date	24 August 2026

RELIEF SOUGHT

I respectfully request that An Coimisiún Pleanála refuse permission for the proposed 110 kV substation, loop-in/loop-out grid connection and associated development. The application is expressly designed to enable and connect the seven-turbine Cunlaghfadda wind farm which Mayo County Council refused on 13 July 2026. The grid development has not been shown to have a credible independent function or site-specific need in the absence of that wind farm. Permission should not be granted for permanent industrial transmission infrastructure whose stated generating purpose has been refused and whose environmental justification depends on the same integrated project.

In the alternative, the Commission should not determine the application favourably unless and until the planning status, final design and environmental effects of the complete wind farm and grid project can be assessed together on a stable and complete evidential basis. The Commission should also consider holding an oral hearing because of the interdependence of the two consenting processes, the scale of the overall project, the Council's contrary findings, and the importance of local landscape and heritage evidence.

EXECUTIVE SUMMARY OF GROUNDS

- **The proposal is functionally inseparable from the refused wind farm.** The applicant repeatedly describes the substation as the means of connecting and enabling the proposed seven-turbine wind farm, not as a general network reinforcement with an identified independent use.
- **The stated need has materially fallen away.** Every quantified benefit—31.5 MW export, household-equivalent supply and avoided carbon—is attributed to electricity from the refused wind farm. The application does not identify another consented generator, contracted network need or alternative independent purpose.
- **The Council's refusal is directly material.** The Council found the wider site to be an open, exposed, populated rural area and refused the wind scheme for unacceptable landscape, scenic-route, Mayo Abbey heritage and residential-amenity impacts.
- **The application understates localised industrial effects.** The proposal includes a substation compound, two control buildings, electrical plant, lighting and lightning masts, two 16 m end masts, a 36 m

telecommunications tower, fencing, hardstands, access tracks, drainage and tree/vegetation removal. These are permanent or long-lived industrial features in the same sensitive landscape.

- **The environmental conclusions are contingent and unstable.** The applicant's conclusions depend on the complete wind farm and grid project, extensive mitigation and the then-assumed planning status of the wind farm. The Planning Report predates and does not engage with the Council's refusal.
- **Hydrology, invasive species and construction risks require particular caution.** The site drains by surface-water pathways towards the River Robe and Meander River; Japanese knotweed is recorded within the construction footprint; and the works require cable trenching, foundations, access, drainage and handling of transformer oil.
- **Teresa Boyle's land and family interests remain affected.** Her family bog lands lie approximately 20 m from a proposed turbine location. The substation is the enabling infrastructure for that same scheme, so permitting it would perpetuate uncertainty and pressure on neighbouring peatland and the future use of family lands.

1. The observer and her direct interest

I am the owner of family bog lands lying approximately 20 metres from one of the turbine sites forming part of the wider Cunlaghfadda project. Those lands have not been cut for decades and remain an important part of our family holding and the local peatland environment. I am concerned about the cumulative effect of the wind farm and its enabling grid infrastructure on the peatland environment, the character and amenity of the area, and the future use and planning potential of our family lands for my grandchildren.

My earlier objection to the wind farm identified the sensitivity of the receiving environment, including raised bog, cutover bog, transition mire and quaking bog, wet grassland and drainage features, and the close relationship between proposed project infrastructure and sensitive peatland habitat. I rely on and maintain those concerns insofar as they relate to the complete project, its cumulative effects and the justification advanced for this grid application.

2. The application is an enabling and integral element of the refused wind farm

This is not an application for a substation with a demonstrated free-standing public-network purpose. The applicant defines the "Proposed Project" as the 110 kV grid connection together with the proposed seven-turbine wind farm. It states that the proposed development "will connect the Proposed Wind Farm to the national electricity grid" and will enable the delivery of the wind farm's renewable electricity. The site notice likewise says the EIAR and NIS assess the grid development and the "integral elements" of the wider seven-turbine project.

The wind-farm application itself also included underground electrical and communications cabling connecting the seven turbines to this proposed 110 kV substation. The two applications are therefore reciprocal parts of one operational development: the turbines require the substation to export power, while the substation's stated purpose and benefits depend on those turbines.

Separate statutory consenting routes do not remove the Commission's obligation to understand and assess the real project before it. The decisive planning point is functional reality. Permission should not be granted by treating the substation as an abstract item of transmission infrastructure while its sole identified generator has been refused. The Commission should assess the direct, indirect, secondary, cumulative and in-combination effects of the whole project and avoid a decision that would predetermine or facilitate a later reworked wind scheme without a complete integrated assessment.

3. No demonstrated standalone need or regional network justification

The applicant's quantified case is entirely wind-farm dependent. The Planning Report attributes an export capacity of approximately 31.5 MW, the claimed supply equivalent of approximately 19,542 households, and the claimed annual carbon displacement to the proposed wind farm. Those benefits cannot be credited to the substation if the generator from which they arise does not have permission.

The applicant's own development-management table records that applications for new transmission lines should include a justification of regional importance and demonstrated need for strengthening the electricity network.

Yet the response given does not identify a network deficit, security constraint, capacity requirement, EirGrid project, connection agreement, alternative consented generator or independent demand that this particular substation would serve. Instead it returns to the environmental assessment and the benefits of the proposed 31.5 MW wind farm.

National and regional support for renewable energy and transmission infrastructure is important, but it is not an automatic entitlement to permission at any location. The relevant local policies expressly qualify support by the need to minimise impacts on communities and protect biodiversity, wildlife habitats, scenic amenities and protected views. The Council has already concluded that this location fails the corresponding landscape, heritage and amenity tests for the generating project the substation is designed to serve.

4. The subsequent refusal fundamentally changes the factual basis of the application

The applicant's Planning Report states that the Council's decision on planning reference P26/60398 was due on 14 July 2026. In fact, Mayo County Council decided on 13 July 2026 to refuse permission. The application materials therefore do not evaluate the substation against the actual and now-known planning outcome for its sole identified generating project.

This is not a minor update. It removes the immediate generating purpose advanced for the substation and directly contradicts important assumptions in the Planning Report, including that the site is suitable, that the complete project can be accommodated without significant landscape effects, and that it complies with local planning policy. The Commission should attach substantial weight to the Council's reasoned, site-specific findings rather than the applicant's earlier predictions.

5. Landscape, visual amenity and industrialisation of an open rural setting

Mayo County Council formally found that the wind-farm site lies in an exposed and open landscape within Policy Area 4, with high-to-medium potential for adverse impact on existing landscape character. It found significant negative effects on that sensitive policy area and on a designated scenic route with a protected view. The Council further described the location as an open, exposed, populated rural area.

The grid proposal must be judged in that established context. It is not simply an underground cable. It includes a 110 kV compound with two control buildings, electrical plant and apparatus, lighting columns, lightning masts, fencing and gates; approximately 982 metres of underground cabling; two approximately 16-metre lattice end masts and hardstands; a 36-metre telecommunications tower; permanent and temporary access tracks; tree felling and vegetation removal; drainage; and ancillary development.

The applicant itself accepts localised negative effects: construction effects on nearby visual receptors are classified as negative, and operational substation effects as long-term, negative and slight. The conclusion that those effects are "not significant" is an evaluative judgment, not an absence of harm. In a flat, open, populated and heritage-sensitive landscape, the compound, towers, masts, lighting, fencing, hardstanding and access works would introduce a concentrated industrial character. Their effect must be assessed cumulatively with the existing 110 kV line and with any future turbine proposal which this infrastructure is intended to enable.

The applicant's claim that the overall project can be accommodated without significant effects is no longer persuasive in light of the Council's contrary site-specific assessment of the photomontages, landscape character and scenic route. A lower structure is not automatically acceptable merely because turbines would be taller. The correct question is whether this industrial compound and associated vertical elements are appropriate in this particular receiving environment and for a purpose that currently lacks permission.

6. Cultural heritage and the setting of Mayo Abbey

Mayo County Council found that the wind development would detract from the cultural heritage of the area, undermine the setting of Mayo Abbey Cemetery and Church ruins—identified as a very important early Christian ecclesiastical site—erode the visual quality of public open views and adversely affect the unique rural character of the immediate area.

The Council planner recorded Mayo Abbey Cemetery and Church Ruins as a cultural-heritage receptor of high sensitivity and noted that visitors would experience visibility of the proposed project. The planner considered

that the applicant's assessment understated the real impact on cultural heritage and that the turbines would introduce disproportionate, incongruous elements into the wider rural landscape.

Although the substation is physically different from the turbines, the grid application is part of the same industrial energy project and the same cultural landscape. The Commission should assess effects on setting, approaches, public views, landscape context and cumulative industrialisation—not merely whether a recorded monument lies inside a 50-metre study corridor. The applicant itself predicts negative operational effects to heritage receptors and acknowledges that the proposed development can cause localised landscape and visual effects.

7. Residential amenity, noise and lighting

The Council's third reason for refusal found that the existing concentration of dwellings made the site unsuitable for the proposed wind development, with 40 residential properties predicted to exceed shadow-flicker guidelines before technological controls. While shadow flicker is turbine-specific, the finding is compelling evidence that this is a populated rural environment rather than a remote industrial location.

The substation has its own amenity effects. The applicant accepts that operational noise will arise from the onsite 110 kV substation, relying on predictions, post-commissioning monitoring and complaint investigation. Construction will also generate noise and vibration from access-track construction, grid works and traffic. In a quiet rural area, tonal or low-frequency transformer noise, security and operational lighting, the 36-metre telecommunications tower, fencing, and maintenance activity require a conservative assessment at the nearest noise-sensitive locations, including at night.

Monitoring after construction is not a substitute for demonstrating acceptability before permission. If the Commission is not with me on refusal, it should at minimum require enforceable limits for tonal and low-frequency noise, pre-construction baseline monitoring, independent post-commissioning verification, restricted lighting, no unnecessary night-time illumination, and a binding complaints and remedial protocol.

8. Biodiversity, peatland and the need for an integrated assessment

My family bog lands lie approximately 20 metres from one of the turbine sites. The earlier wind-farm material identifies peatland and wetland habitats in the wider project area, including raised bog, cutover bog, transition mire and quaking bog, and acknowledges infrastructure close to sensitive bog remnants. Those concerns remain relevant because the applicant has chosen to assess the substation and wind farm as one proposed project for EIA and Appropriate Assessment purposes.

The Commission should ensure that the assessment is based on the full project actually likely to be carried out, including any revised turbine scheme, all internal cabling, access and drainage works, delivery works, construction compounds and the grid connection. A conclusion based on the presently refused seven-turbine design may not remain reliable if the generating project is materially redesigned, relocated or resubmitted. Equally, granting the grid infrastructure now would constrain the alternatives available for any future wind proposal and could make this site and connection route a fait accompli.

The applicant's broad assertion that high-value Annex I habitat was avoided does not eliminate indirect hydrological effects, fragmentation, disturbance, construction pathways or cumulative impacts on neighbouring bog and wetland areas. The Commission should require the project description, mitigation, monitoring and cumulative assessment to be internally consistent across both consenting processes before reaching any favourable conclusion.

9. Appropriate Assessment, hydrology and water protection

The applicant's material identifies the River Moy SAC, Balla Turlough SAC and Lough Mask SPA for assessment and states that surface water generally leaves the wider site towards the River Robe and Meander River, providing the primary pathway to downstream designated sites. The NIS conclusion depends on avoidance, design and mitigation measures blocking identified pathways.

The grid works themselves involve extensive excavation and disturbance: a substation platform and foundations, a 982-metre cable trench, end-mast and telecommunications-tower foundations and hardstands, access tracks, tree and vegetation removal, drainage and a temporary compound. Risks include sediment

release, altered local drainage, fuels and chemicals, concrete works, and transformer oil. The applicant proposes a transformer bund of 110% of stored oil volume, which confirms the presence of a pollution source requiring long-term containment and maintenance.

The Council planner also recorded that the River Moy SAC is hydrologically connected to the site and noted downstream groundwater-dependent sites and drinking-water abstractions. Inland Fisheries Ireland recommended multiple construction controls to prevent siltation. Although the Council's environment section reached a favourable AA conclusion for the wind application, those conclusions remain dependent on the precise project and mitigation assessed and do not answer the consequences of a later redesign of the refused

The Commission should not adopt a generic "no significant effects" conclusion without independently verifying the detailed drainage design, treatment-train capacity, discharge points, cable-trench dewatering, extreme rainfall provisions, maintenance obligations, emergency spill response, and cumulative effects of all wind-farm and grid works. If complete, precise and definitive findings cannot be made for the project as it will actually proceed, permission should be refused.

10. Japanese knotweed and biosecurity

The applicant records Japanese knotweed within the proposed construction footprint and relies on a site-specific Invasive Species Management Plan. This is a material construction risk because trenching, earthworks, vegetation clearance, vehicle movements and movement of soils can spread viable material within the site and onto public or third-party lands.

The Commission should require proof that the invasive-species survey is current and covers every work area, access route, compound, laydown area and spoil destination. Treatment proposals dependent on future licences or consents should not be assumed to be available.

11. Construction traffic, access, safety and farming activity

The substation requires delivery of transformers, electrical plant, steelwork and tower components together with excavation equipment, concrete and construction materials. Even though the 982-metre cable is proposed on private land, construction traffic must reach the site by local roads and use new permanent and temporary access tracks. The assessment should clearly separate grid-only traffic from turbine-delivery traffic and identify the routes, vehicle numbers, axle loads, construction duration, passing arrangements and any verge, culvert, wall or drainage works needed for the grid project.

The Council planner recorded concerns relating to local roads, bridges, culverts, utilities and public infrastructure and noted Inland Fisheries Ireland's construction-phase measures against siltation. The Commission should consider road safety for residents, farm access, livestock, walkers and other road users, and should not leave material route or accommodation works to later agreement where their environmental effects have not been assessed.

12. Alternatives and premature commitment of the site

The Planning Report describes an initial 38 kV option and a later 110 kV loop-in design, with the substation relocated to shorten the connection to the Castlebar–Cloon line. That is principally a design optimisation for the wind farm; it does not demonstrate why this permanent 110 kV development should be consented now, after the generator has been refused, or why no alternative future connection location or technology would be environmentally preferable for any redesigned project.

Granting permission would materially narrow the alternatives for any future generating proposal. Commercial investment and sunk costs in the substation could create pressure to design a future wind farm around a pre-consented grid location rather than select the least harmful overall configuration. The environmentally responsible sequence is to establish an acceptable generating project and then determine its appropriately designed and fully assessed connection, or to determine both on a genuinely integrated basis.

13. Response to the claimed climate and energy benefits

I recognise the importance of renewable energy, grid resilience and emissions reduction. My objection is not an objection to renewable energy in principle. The Mayo County Development Plan supports renewable energy and transmission subject to environmental protection, landscape, heritage, biodiversity and local amenity safeguards. The Council expressly recognised the benefits of renewable energy but found that the significant visual and cultural impacts at this exposed location outweighed them.

Climate policy does not establish that every proposed project is suitable at every site. Nor can the substation claim the wind farm's 31.5 MW and carbon benefits where permission for that wind farm has been refused. The Commission should distinguish the general desirability of renewable infrastructure from the site-specific planning merits and the absence of a presently consented use for this development.

14. Conditions cannot cure the central defects

The central problems are not matters of landscaping detail or construction management. They are: the absence of a permitted generating project; the lack of demonstrated standalone need; the conflict between the application's assumptions and the Council's subsequent refusal; and the premature commitment of the site and connection route. Those defects go to the principle and timing of the development and cannot safely be deferred to conditions.

15. Request for oral hearing

I ask the Commission to consider an oral hearing. The case raises an unusual and important interaction between a direct strategic-infrastructure application and a separate wind-farm application which was refused during the SID process. An oral hearing would allow proper testing of the claimed need, the functional dependence on the refused wind farm, the alternatives, the applicant's response to the Council's findings, and local evidence on landscape, heritage, residential amenity, peatland, hydrology, access and cumulative effects.

16. Conclusion

For the reasons above, I respectfully request that An Coimisiún Pleanála:

- refuse permission for the proposed 110 kV substation, loop-in/loop-out connection and associated development;

Yours faithfully,

Teresa
Currykirwan
Mayoabbey
Claremorris
Co. Mayo

Boyle