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

**Regarding:** An Coimisiún Pleanála - Case reference: VA16.324429

**Applicant:** Cunlaghfadda Green Energy Limited

**Development Description:** Proposed 110kV electrical substation compound (~12,405 m<sup>2</sup>), 982 metres of 110kV underground cabling, 2 no. 16m end masts, a 36m telecommunications tower, temporary construction compound, access tracks, drainage network, tree felling, and ancillary works in the townland of Cloonbaul, Co. Mayo.

**Affected Property / Submitter:** Residence and Established Family Business at  
Eircode F12 XW61

**Re: Strategic Infrastructure Planning Application — Reference VA16.324429**

Dear Sir/Madam,

I wish to formally lodge an objection to the grant of planning permission for Strategic Infrastructure Development (SID) Application Reference VA16.324429.

While supporting national renewable energy objectives, major decision-making on infrastructural additions must ensure they are appropriately sited. A rigorous examination of the submitted documentation reveals that the proposed 110kV substation, 36m lattice tower, end masts, and extensive cabling—both independently and cumulatively with the parent 7-turbine wind farm (PI. Ref. 2660398)—introduce severe, unmitigable hydrogeological, ecological, structural, and residential amenity impacts.

The site forms an active environmental mosaic upstream of sensitive natural systems. This proposal threatens local domestic infrastructure, critical aquifers, and globally endangered biodiversity.

Under established Irish and EU jurisprudence (*Kelly v. An Bord Pleanála*, *Waddenzee C-127/02*), planning permission must be refused where complete, precise, and definitive findings capable of removing all reasonable scientific doubt are absent. An Coimisiún Pleanála is urged to apply the Precautionary Principle and refuse approval based on the following grounds:

## **Grounds of Objection and Submission**

### **1. Hydrological & Peat Stability Risks (Karst Aquifers, Water Quality, and Downstream Flooding)**

- **Karst Hydrogeology & Aquifer Exposure:** The underlying bedrock is designated as a Regionally Important Aquifer – Karstified (conduit), characterized by High (H) Groundwater Vulnerability. Trenching 982m of 110kV underground cable, pouring massive subterranean foundations for the 12,405 m<sup>2</sup> substation compound, and excavating for 16m end masts and a 36m telecommunications tower risk shattering karst conduits. Surface contaminants, hydrocarbons, and alkaline concrete wash-water will bypass thin subsoils, directly contaminating regional groundwater reserves.
- **Massive Peat Excavation & Instability:** The project involves excavating and moving large volumes of peat and overburden/spoil, disturbing peat depths up to 6.1 metres. Dewatering and stripping these deep peat profiles introduce acute peat stability and slide risks, generating heavy suspended solids that drain into local water bodies including Drumady Lough, Lough Nambrackkeagh, Lough Fark, and the River Moy SAC catchment (Site Code: 002298).
- **Open Hydro-Ecological Pathways & Subterranean Siltation:** The site directly feeds the Meander and Robe River sub-catchments. Silt management relies on standard surface traps; however, the applicant completely fails to evaluate subsurface macro-pore piping (peat pipes). Heavy machinery weight and operational vibrations will force water-borne peat silt through subterranean pipes, bypassing surface silt fences into the Meander River where it will choke gravel spawning beds for Annex II Atlantic Salmon (*Salmo salar*) and threaten protected populations of White-clawed Crayfish (*Austropotamobius pallipes*), Sea Lamprey, and Brook Lamprey.

### **2. Critical Engineering Omissions in Surface Water Design & Lack of Attenuation Sizing**

A fundamental flaw within the applicant's Surface Water Management Plan and Environmental Impact Assessment Report (EIAR) for Case Reference VA16.324429 is the total lack of transparency and empirical data regarding the structural capacity of the surface water drainage design.

- **Failure to Provide Verifiable Volumetric Storage Capacities:** The applicant's layout plans indicate that surface water runoff from the 12,405 m<sup>2</sup> substation compound, temporary construction compound, 982m underground cable trenching routes, access tracks, and associated spoil management areas will be directed into a network of stilling ponds, swales, and settlement lagoons. However, the documentation fails to provide the exact technical specifications, physical dimensions, and cubic-metre storage capacities required for each individual attenuation structure, including defined top water levels. Without explicit metrics detailing the maximum physical volume these structures can contain before overtopping, the application relies entirely on qualitative assertions. It is mathematically impossible for An Coimisiún Pleanála to verify that these surface water controls are structurally adequate to achieve a true Greenfield Runoff Rate.

- **Failure to Demonstrate Safety Thresholds Against a 1-in-100-Year Storm Event:** Standard engineering specifications for Strategic Infrastructure Developments in Ireland (including CIRIA C753 The SuDS Manual guidelines) mandate that surface water systems must be designed to contain a 1-in-100-year storm event (a 1% Annual Exceedance Probability [AEP] event). The applicant has failed to provide explicit, localized hydrological modeling outputs demonstrating how the proposed attenuation network will perform under such extreme meteorological conditions across the townland of Cloonbaul. The ponds used in the submission are sized for a 1-in-10-year event and only appear aimed at reducing silt discharging to the environmentally sensitive area. There is no information confirming that there will not be adverse flooding issues associated with the addition of a large hardstanding area.

- **Total Absence of Climate Change Headroom Factoring:** In accordance with contemporary Irish planning and climate adaptation standards, surface water drainage models must incorporate a mandatory safety headroom allowance of 20% to 30% to account for projected increases in rainfall intensity. Because the applicant has failed to present transparent, quantified input/output data for a climate-factored 1-in-100-year storm event, the proposed drainage layout must be deemed structurally undersized.

### **3. Aggravation of Flood Risk at Property Eircode F12 XW61**

The surrounding drumlin and peatland environment across Cloonbaul features highly saturated, waterlogged subsoils with restricted natural drainage capacities. The residence and established family business identified by Eircode F12 XW61 already experience localized hydrological stress and flooding vulnerabilities during prolonged precipitation.

- **Capping of the Natural Bog "Sponge":** Replacing natural, absorbent vegetation and deep peat layers (up to 6.1m deep) with a massive 12,405 m<sup>2</sup> concrete substation compound, heavy foundation bases for 2 no. 16m end masts and a 36m telecommunications tower, combined with sprawling crushed-stone access roads, dramatically expands the site's impermeable surface area. Cumulatively with the parent 7-turbine project (Pl. Ref. 2660398), this development significantly compresses the site's "Time of Concentration" (the duration required for runoff to flow from the furthest point of the catchment to the outlet), converting diffuse rainfall into high-velocity surface runoff.

- **Artificial Highway for Runoff:** The proposed drainage strategy relies on extensive interceptor swales and side drains designed to dewater the civil layout for structural stability. This artificial design short-circuits the natural hydrological regime by concentrating diffuse water into high-velocity artificial channels, accelerating flash-flooding surges into downstream tributary networks that drain directly toward low-lying properties, specifically threatening Eircode F12 XW61.

- **Saturation Capacity Failure & Downstream Vulnerability:** Because the applicant has failed to prove that the proposed settlement ponds and attenuation structures possess the physical storage capacity to choke back peak storm surges, the civil works will inevitably result in increased, severe flash flooding downstream, endangering the residential structures and commercial curtilage at Eircode F12 XW61.

#### **4. Ecological Impacts & Priority Habitats (EU Directives & Protected Fauna)**

- Omission of Critically Threatened Avian Fauna (Eurasian Curlew): The Red-listed Eurasian Curlew (*Numenius arquata*, EU Birds Directive Annex II) maintains active foraging and commuting usage across the site. The application's seasonal walkover baseline failed to record long-term local observations. Operating 136m rotor sweeps (Pl. Ref. 2660398) adjacent to tall grid structures creates fatal collision hazards, while ground clearing fragments damp peat foraging grounds and introduces predator vantage points.

- Disruption to Annex I Priority Habitats: Civil earthworks, soil stripping, and heavy transport will permanently destroy and fragment sensitive peatland habitats, including Annex I Transition mires and quaking bogs [7140] and Annex I Molinia meadows [6410], while altering site hydrology.

- Disturbance to Protected Bat Species: Field surveys document foraging and roosting activity for general bat species (including Leisler's bat and soprano pipistrelle). The potential presence of suitable habitat features for Annex II listed species such as the Lesser Horseshoe Bat means that substation floodlighting, tower erection, and tree felling introduce severe light spill and landscape fragmentation that risk destroying established flight corridors.

- Destruction of Annex II Marsh Fritillary Habitat: Confirmed breeding populations and larval webs of the Marsh Fritillary butterfly (*Euphydryas aurinia*) occur on site. Proposed "enhancement zones" fail to legally compensate for the physical destruction of Devil's-bit Scabious breeding patches under the physical development footprint.

- Net-Negative Carbon Contributions: Excavating deep peat profiles releases historically sequestered carbon. Dewatering accelerates active organic decay, converting a long-term carbon sink into a net greenhouse gas emitter in direct conflict with national climate policies.

#### **5. Landscape, Visual Amenity, & Industrialization of Rural Countryside**

- Visual Intrusion of Grid Infrastructure: Introducing a 12,405 m<sup>2</sup> 110kV substation compound, 2 no. 16m end masts, and a prominent 36-metre telecommunications tower imposes a stark industrial presence on an open, low-lying rural drumlin landscape.

- Cumulative Overwhelming Impact at Eircode F12 XW61: Evaluated alongside the parent project's 7 no. 160m wind turbines and 92m met mast, the total infrastructure creates extreme visual overdraw and overbearing spatial oppression when viewed from Eircode F12 XW61.

- Unmitigated Shadow Flicker: Solar trajectories place the property at Eircode F12 XW61 directly within the morning/evening shadow flicker zone of the parent turbines. The absence of a binding, 100% automated SCADA stop-line control exposes occupants to continuous strobing and neurological stress.

## **6. Residential Amenity, Construction Impacts, & Traffic**

- **Construction Traffic & Road Degradation:** Moving large volumes of material and constructing major grid infrastructure will direct heavy haulage traffic onto local rural roads (L1505, L15053), subjecting residents at Eircode F12 XW61 and surrounding areas to severe decibel noise, dust, continuous ground vibration, and road degradation.
- **Irrevocable Loss of Rural Character:** Broad scale tree felling, hedge removal, and road widening to facilitate abnormal loads permanently erase the traditional, mature landscape character of the townland.
- **Operational Noise & In-Situ Blasting:** Predictive noise models omit continuous Low-Frequency Noise (LFN) and atmospheric Amplitude Modulation (AM) under Western wind shears. Furthermore, rock-breaking and blasting at the parent site borrow pit will radiate high-intensity impulse noise and micro-seismic vibrations across the locality.

## **7. Conclusion & Request to An Coimisiún Pleanála**

Under established Irish and European case law (*Waddenzee*, *Kelly v. An Bord Pleanála*), an Appropriate Assessment cannot have lacunae and must remove all reasonable scientific doubt. This application fails to satisfy the minimum structural, legal, and environmental thresholds required across all examined dimensions:

- **Hydrological & Peat Stability Risks:** Deep excavation over a conduit karst aquifer threatens regional groundwater tables, sub-surface peat pipes, and downstream SAC ecological connections.
- **Critical Engineering Omissions in Surface Water Design:** The drainage plan lacks verified cubic-metre attenuation storage capacities, fails 1-in-100-year storm event modeling, and omits mandatory climate change headroom allowances.
- **Aggravation of Flood Risk at Eircode F12 XW61:** Replacing absorbent peat with extensive hardstanding surfaces short-circuits natural drainage regimes and redirects severe flash-flooding surges directly toward Eircode F12 XW61.
- **Ecological Impacts & Priority Habitats:** Development directly degrades Annex I peatlands and fragments critical habitats for EU-protected species, including the Eurasian Curlew, Lesser Horseshoe Bat, and Marsh Fritillary.
- **Landscape, Visual Amenity, & Rural Industrialization:** The 12,405 m<sup>2</sup> substation, 36m lattice tower, and end masts impose prominent industrial visual intrusion and spatial oppression when viewed alongside the parent wind farm.
- **Residential Amenity, Construction Impacts, & Traffic:** Heavy construction traffic on narrow roads (L1505, L15053), persistent operational noise, and borrow pit blasting inflict continuous acoustic, vibration, and structural impacts on local residents. Taken individually, any of these engineering, environmental, or legal omissions constitutes a fatal flaw; taken together, they represent an unmitigated threat to the locality.

If this wind turbine project were to be granted planning permission, it could cause unimaginable and potentially irreversible damage to an important environmental site in the Mayo Abbey area. The development poses a serious risk to the entire ecological system of the area, with the potential for habitats, wildlife and the delicate balance of the local ecosystem to be permanently disrupted. Once this ecological balance is damaged, there is no guarantee that it could ever fully recover. While proposals may include moving or relocating certain species, this cannot provide any certainty of success, nor can it guarantee the continued survival of the vital plants and animals that form part of the area's ecological cycle. Such measures cannot adequately replace the natural habitats and interconnected ecosystems that have developed over many years. For these reasons, I believe the potential environmental consequences must be given the highest consideration before any decision is made to grant permission.

Certain reassurances and promises made by the Council and the developer cannot be regarded as any guarantee to the local businesses that are currently thriving in the immediate area, nor to the many generations of farmers in the locality whose livelihoods depend on their land. There remains a very real concern that, should the development proceed, these businesses could suffer significant and lasting disruption, while agricultural land could be flooded, degraded, or permanently damaged. No assurances can provide certainty that these impacts will not occur, and once businesses are lost or productive farmland is permanently damaged, the consequences for the local community and future generations may be impossible to reverse.

I respectfully request An Coimisiún Pleanála to apply the Precautionary Principle, protect local residents and ecosystems, and REFUSE planning permission for An Coimisiún Pleanála - Case reference: VA16.324429.

Yours faithfully,  
Thomas Monaghan