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An Coimisiún Pleanála
64 Marlborough Street
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Observation on the Proposed Cloonbaul 110 kV Substation

An Coimisiún Pleanála Case Reference: 324429

Applicant: Cunlaghfadda Green Energy Limited | Location: Cloonbaul, Co. Mayo

Dear Sir/Madam,

The substation must be refused given its proposed location on top of a national monument, MA101-106. The EIAR completely fails to consider the townland as a deeply integrated archaeological landscape. Within close proximity to the site are a previously described Bronze Age mound and the Kilbride late Neolithic ceremonial circle. There is also a children's burial ground within a few hundred metres. The comprehensive Mayo Abbey Archaeological Survey of 1995 describes MA101-106 as being of 'immense importance'. This independent description is in stark contrast to MKO's description of CH-10. It is remarkable that even the desktop study did not reference the easily accessible 1995 survey. This monument must be preserved in situ, as we have already lost the Kilbride monument. The suggestion of a Neolithic field system is bolstered by further documented field systems in the neighbouring townland of Knockaunakill. It would be an international travesty if this ancient site were disturbed, given its potential for further research. If emeritus Prof Rosemary Cramp believed Mayo Abbey to be of outstanding importance for the early Christian heritage alone surely our own planning authority can acknowledge same.

The ornithological survey is also deeply flawed. It references the dated Bird Atlas 2007-2011, which has clearly underestimated recorded populations. It describes both the meadow pipit and kestrel populations as being of 'local importance'. How can this be accurate given the dated reference and the fact that there have been well-documented declines in these populations since? The meadow pipit is now absent in many areas, and the kestrel is a Red-listed species, yet it is recorded as actively breeding on the site.

The EIAR describes species-rich wet grassland on the site and regenerating cutover bog. Given the abundance of Red-listed species on the site, surely, in the age of the Nature Restoration Law, we should be earmarking this site as ripe for future restoration. The precautionary principle must be followed.

Finally, the EIAR describes rich marsh fritillary butterfly habitat with active breeding. The mitigation measures outlined are ludicrous. The suggestion that the current population could be protected by simply placing a five-metre buffer around previously recorded larval webs is a sad reflection of where we are. **Where is the evidence that such a method would be effective?** The mitigation section is an appendix of supposition. A vast network of devil's-bit scabious was discovered across the site. How can we be sure that the survey year of 2025, which showed 43 larval webs outside the site, would be repeated in future years? The marsh fritillary butterfly may choose to breed within the site at a later

date, given that the distance involved is a remarkable two metres at one point. The mitigation measures do not reflect the EU Habitats Directive, which seeks to protect this species.

The Coolglass judgment of 2026 does not supersede the absolute protections set out under EU legislation. This is a sensitive location with huge habitat potential. It is not an appropriate site for industrialisation.

Yours faithfully,

Mary Ryan