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Case type: **Strategic Industrial Development**

Case Reference: **VA16.324429**

Proposed Development which consists of a 110kV onsite electrical substation, loop-in grid connection, and associated infrastructure and works - Cunlaghfadda Green Energy.

An Coimisiún Pleanála,

I wish to make the following submission in relation to the above planning application.

1. Functional Interdependence

The proposed Grid Connection and Substation were intended to facilitate the Cunlaghfadda Green Energy Wind Farm, Mayo County Council Planning Reference 2660398. That application was refused permission by Mayo County Council on 13 July 2026. Therefore, there is no established planning need for the proposed grid infrastructure.

- The site notice demonstrates that the proposed Grid Connection and Substation is functionally, physically and environmentally linked to the seven turbine wind farm development, sharing the same construction access and infrastructure corridor.
- The proposed Grid Connection and Substation, and the wind farm development are referred to as “the Proposed Project”. They are woven consistently throughout the planning application and the EIAR.

1. Executive Summary. “The Proposed Cunlaghfadda Green Energy Project ‘the Proposed Project’ consists of a 110kV onsite substation, loop-in grid connection, and associated infrastructure and works (‘the Proposed Grid Connection’) and 7 no. wind turbines, and associated infrastructure and works (‘the Proposed Wind Farm’) in Co. Mayo.”

2. Introduction. “The Proposed Development forms part of the Cunlaghfadda Green Energy Project (‘the Proposed Project’) which is comprised of the Proposed Development and the proposed 7 no. wind turbines, and associated infrastructure and works (‘the Proposed Wind Farm’).”

2. Introduction. “The Environmental Impact Assessment Report (EIAR) and Appropriate Assessment Screening Report (AASR) and Natura Impact Statement (NIS) assess the Proposed Project which comprises both the Proposed Grid Connection and the Proposed Wind Farm and accompany both applications. The EIAR, and AASR and NIS also assess works to the Turbine Delivery Route and junction accommodation works.”

5.2 Proposed Development Design Process. “The Proposed Development is being proposed to enable the generation and transfer of renewable wind energy from the Proposed Wind Farm to the national electricity grid, the design process of the Proposed Development forms part of the overall design process of the Proposed Project, which includes the Proposed Development and the Proposed Wind Farm.”

2.2.2.1 “Access to the Substation will be through internal Wind Farm.”

2. Landscape Impact

In refusing planning, Mayo County Council found that the development would interfere with the character of the landscape, adversely affect designated scenic routes and protected views, and conflict with Policy REP 1 of the Development Plan.

The proposed Grid Connection and Substation and associated works are situated within the exact same sensitive receiving environment that led to the refusal of the wind farm.

There are beautiful walks along quiet tranquil country roads and boreens, along a patchwork of fields, bogs and lakes.

Knockaunakill Loop Walk: Fig 3-1 Site Location Context

- **L-15053**, known locally as “The Bog Road” is also used for leisure activities. L-15053 links up with the Knockaunakill Loop Walk.
- There is a right of way, **going through** the Proposed Substation, which also links to L-15053 (marked on historic 25-inch Ordnance Survey map).
- The relationship between the natural landscape, archaeology and built heritage is central to the experience of these routes.

Apart from nature or the splash of raindrops, there is barely a sound. People are “going back to nature”, looking for peace and calm, which is found in abundance in the surrounding area of the beautiful village of Mayo Abbey. This area is a sanctuary.

It is a place where nature, history and everyday life all exist together in one of the most beautiful and interesting landscapes in Ireland.

3. Heritage Impact

Mayo Abbey is of exceptional archaeological, historical and cultural significance.

Here lies one of the most important religious sites in Western Europe founded by St. Colman in c.668AD (7th Century). **What remain today are the ruins** of a 15th century **Abbey** that is an Archaeological site of **National and International importance**. It is classed as an Archaeological goldmine by experts in that field.

- Professor Dame Rosemary Cramp said “The site at Mayo Abbey is one of outstanding importance within the history of European monasticism.”
- The old graveyard adjacent to the Abbey is a layered graveyard and is in continuous use for over 1300 years. 1176, Donal, brother of Rory O’Connor, the last High King of Ireland died and is buried in Mayo Abbey.
- During the penal times the parishioners openly worshipped in defiance of the law inside a church on the site of the “**Famine Church**”. The Famine Church (St.Colmans Church) was built adjacent to the old graveyard in the 1840s and officially opened in 1845.)
- It is one of the few unaltered pre-famine churches in County Mayo.

The Mayo Abbey Famine Church (St.Colmans Church), forms part of a site of significant architectural, archaeological, historical and cultural importance, and must be preserved.

An area of 11.44 hectares, surrounding the Mayo Abbey Famine Church and Abbey (Ruins) was put under the protection of the Office of Public Works.

Any development that could adversely affect its setting or its curtilage will have impacts on its character and significance.

The ruins of the 15th century Abbey are a Recorded Archaeological Monument (Sites and Monuments Record – SMR)

- **MA090-100004-**
“Six inch first edition: Abbey in ruins”
“Six inch latest edition: Abbey (in Ruins)”

Introducing a Strategic Industrial Development in the vicinity will visually intrude upon and undermine the historical integrity and dignity of this heritage site.

- It introduces a starkly urban, industrial element into an environment where preservation of historical and cultural context is paramount.
- This Strategic Industrial Development is incompatible with its established character. It would affect how people experience its ancient significance.
- The cumulative archaeological, historical and cultural importance of Mayo Abbey reinforces the need to protect its setting from industrial development.

4. Archaeological Heritage Impact

Because of its size, state of preservation and its place in the evolution of the early Christian Church in the British Isles, the area around Mayo Abbey is considered by many experts to be

one of the most important unexplored archaeological sites in Ireland being similar in size and importance to Armagh, Clonmacnoise and Glendalough.

In 1995–1996, the Mayo Abbey Heritage Committee undertook a comprehensive archaeological survey of Mayo Abbey and its surrounding landscape. The survey recorded approximately 120 archaeological sites, including prehistoric, early medieval and later monuments, **highlighting the exceptional archaeological significance of the area.**

Multiple Ring Forts, Souterrains, Fulachta Fiadh, Killians/Lisheen (childrens burial grounds), Circular house sites, Stone Cairn, Ancient Field Systems and Megalithic tombs, were documented, reflecting the areas rich medieval landscape. **An Enclosure (CH10) in Cloonbaul townland was also documented.**

This Enclosure (CH10) is within the Footprint of the Proposed Project.

In refusing planning application number 2660398, the **“Report Received from Internal Staff: Archaeology” (Mayo County Council) also references this monument:**

- “4. The Cultural Heritage (CH) Site No. 10 in the Archaeological Impact Assessment has recently been included in the Recorded Monuments and Places (RMP) for Co. Mayo by the Archaeological Survey of Ireland and has been assigned the monument number MA101-106---- Enclosure.”

This Recorded Monument MA101-106---- must be fully protected and Preserved in Situ.

Given its archaeological significance and protected status, **no development, construction, excavation, ground disturbance, access works, services, infrastructure, landscaping, or other works should be permitted within or immediately adjacent to the monument** where such works could impact upon the monument, its archaeological remains, or its setting.

<https://www.mayo.ie/getmedia/27fff356-ce8e-4492-8651-c6791750f81f/The-Mayo-Abbey-Archaeological-Survey.pdf>

- **Cloonbaul - ENCLOSURE + FIELD SYSTEM** - Site Number 99 (pg.374 & pg.375 & pg.376 & pg.377)
“Though not marked on any earlier maps, **this site would appear to be of immense archaeological significance because of the large area it occupies.**”

Also in the fields adjacent to the Proposed Grid Connection and Substation are:

- **Cloonbaul - MOUND** - Site Number 48 (Mayo Abbey Archaeological Survey pg.371 & pg.372)

In refusing planning application number 2660398 (Wind Farm) the” Report Received from Internal Staff: Archaeology” (Mayo County Council) also references this mound:

- “5. In 1995/96 a previously unrecorded Mound was discovered in/or in the vicinity of Cloonbaul townland by Mr. Leo Morahan, Consultant Archaeologist during a survey of archaeological monument in the Mayo Abbey area.”
- **Cloonbaul - CHILDRENS BURIAL GROUND** - Site Number 59 (Mayo Abbey Archaeological Survey pg.244 & pg.245)

Cloonbaul is adjoining Kilbride, Harefield, Knockaunakill, Cunlaghfadda and surrounding areas, all of which contain archaeological sites. **There is a language of connection between these sites.**

Mayo Abbey has a rich archaeological heritage dating from prehistoric times to the present. **On-going Archaeological and Heritage research shows that the Mayo Abbey area is a highly sensitive archaeological and cultural heritage resource that merits protection.**

2023: A **LiDAR survey** (a remote sensing technique for creating a high resolution, high accuracy topographic model of a landscape) was carried out by the Mayo Abbey Heritage Committee. A late Neolithic circle was found in Kilbride, **beside my home.**

- **This site is c550 meters from the proposed Grid Connection and Substation.**

The site at Kilbride dates to c.3160 BC and there can be no doubt that this area had considerable settlement in the Neolithic (Mitchell & Ryan 2001).

You are seeing the pulse of history. It’s a sacred landscape. This is a Relict Landscape.

Mayo Abbey today is a vibrant village with a thriving community quietly preserving this legacy of its remarkable place in local and European history. **As it was in the past, Mayo has become a focus of learning, through geophysical, palaeoenvironmental, archaeological and historical research.**

2020: ATU Castlebar/Masters Thesis: “Mayo Abbey’s History and Archaeology from 600 to 1600AD”- Mr.Michael Timothy.

2009: A sewerage scheme and new water supply were installed in the village; this resulted in two **archaeological digs** being carried out within the Monastic Enclosure and surrounds.

2005: The Corrib Gas Line traversed the parish resulting in an **extensive excavation** being undertaken in the townland of Kilbride.

NUIG 1996 - 2000

- **Applied Geophysics Unit:** Geophysics survey of a number of monuments and a section of the Monastic Enclosure - Mr. John Madden.

- **Botany Department:** Pollen research on cores from Lough Fark (c 0.8km from the Proposed Strategic Industrial development) - Ms. Janice Fuller.
The main conclusions of Pollen data from Lough Fark indicate that people have been active in the landscape around Mayo Abbey for millennia.
- **History Department:** The early history of Mayo of the Saxons - Ms. Vera Moynes.

Mayo County Development Plan 2022-2028 - relevant policies and objectives

- **BEO 1** To protect the archaeological heritage and sites identified in the Record of Monuments and Places, National Monuments in the ownership or guardianship of the State in addition to National Monuments that are the subject of Preservation Orders, and to safeguard the integrity of the archaeological sites in their setting.
- **BEP 3** To encourage the management and maintenance of the county's archaeological heritage, including historic burial grounds, in accordance with best conservation practice that considers the impact of climate change.
- **BEO 6** To protect archaeological sites, monuments, underwater archaeology and archaeological objects in their setting, which are listed on the Record of Monuments and Places for Mayo.

5. Impact on Heritage Tourism (5.3.2.2 Tourism Attractions)

Archaeological sites, Monuments and Spiritual Walks are part of Irish national heritage and are recognised tourist attractions across the country.

There is a well-known pilgrim route from Mayo Abbey to Ballintubber Abbey (11km). This walk is part of the Tóchar Phádraig, an ancient pilgrimage path that weaves faith, landscape and tradition together into a journey that eventually leads all the way to Croagh Patrick. It is a living piece of Co. Mayo's heritage.

https://www.mayo-ireland.ie/en/towns-villages/balla/balla.html?utm_source=chatgpt.com

- “There also existed in the 5th Century the "Tochar Phadraig" which marked the route travelled by St Patrick from Croagh Patrick and which travels through places such as Ballintubber and Mayo Abbey. “

Tóchar Phádraig is traditionally regarded as an ancient route from **Cruachán (Rathcroghan), the royal centre of Connacht, to Cruachán Aigle**, the ancient name associated with Croagh Patrick.

The **Annals of Ulster under 1110** record the construction at Mayo Abbey of a *damhliag* (stone church) specifically **for pilgrims**.

- “The Saxons of Mayo granted the tithes of their city to God and St Michael, and they made a *damhliag* in it for **the pilgrims of God for ever.**”

- It then records that the *damhliag* was destroyed, killing people and cattle, and that it was subsequently renewed and **again confirmed for pilgrims perpetually**.

That is significant because it demonstrates that by **1110 there was an organised pilgrimage institution at Mayo Abbey with permanent infrastructure specifically intended for pilgrims**.

The 1110 Mayo Abbey entry (Annals of Ulster) calls the place **“their city”** and the church was endowed **specifically for pilgrims**. Mayo Abbey was functioning as a **destination or station within a wider pilgrimage system**, not simply as an isolated Abbey.

- **1113** The Annals of Ulster under **1113** record an event on **Cruachain Aighle (Croagh Patrick)** on the feast of Patrick: “a ball of fire came upon the mountain and killed thirty of those who were fasting.”

That is very strong evidence that people were undertaking a religious observance on Cruachain Aighle/Croagh Patrick at this date.

- **1216 Ballintubber Abbey had a pilgrim hostel**. The abbey was founded by Cathal Crobhdearg Ua Conchobair in 1216, and its own historical material says that a hostel was established there to accommodate pilgrims.

Mayo Abbey is not an arbitrary location. It sits within the same western Connacht pilgrimage landscape through which the traditional Tóchar route passes.

- **Maigheo represents two Irish words**, “Mag” meaning an open stretch of land and “Éo” meaning a yew tree, the Old Irish name Mag Éo can be translated as 'The Plain of Yew Trees', also known as the 'Plains of Mayo'.
- **2020: ATU Castebar - Masters Thesis** by Mr. Michael Timothy, “Mayo Abbey’s History and Archaeology from 600 to 1600AD”, references this Spiritual Tóchar Route through “the Plains of Mayo.”
- **The 2023 LiDAR survey** also recorded an image that seems to represent the original main approach to the monastery in Mayo Abbey, the ancient route from Cruachán (Rathcroghan).

Ballintubber Abbey has been allocated €6.4million under the Rural Regeneration and Development Fund for the construction of its new Cultural and Heritage Visitor Centre and associated conservation works. This will result in;

- Increased visitor numbers to the region including Mayo Abbey.
- Economic spillover effects.
- Greater awareness of Mayo's early Christian heritage.

UNESCO recognition - Joyce Country and Western Lakes Geopark - will attract more international and domestic visitors to the Mayo Abbey region. Research on UNESCO tourism shows that recognised sites often act as **“gateway attractions”** that spread economic benefits to surrounding communities.

Mayo Abbey can be considered part of its wider surrounding landscape and tourism catchment area. **Vol. 2 Photomontage View Point 12 - Lough Mask.**

Inland Mayo Region Destination and Experience Development Plan: The Inland Mayo Region Destination and Experience Development Plan presents a significant opportunity for Mayo Abbey to become a more prominent heritage tourism destination. Mayo Abbey possesses a unique historical significance that aligns strongly with Fáilte Ireland's objective of using heritage as a catalyst for tourism development.

Fáilte Ireland said: **“The Irish landscape has been the cornerstone of international tourism marketing for decades. Quality, character and distinctiveness of this valuable resource should be protected.”**

We inhabit a peaceful environment, stunning landscape and have a strong connection to the land. **The introduction of a Strategic Industrial Development, threatens to severely undermine these benefits.** It will permanently damage the natural splendour of the area; reduce uninterrupted views and potentially damaging any future development of tourism to the area.

6. Natural habitats, Local wildlife (flora & fauna) Impact

A total of fifteen habitats were recorded within the Proposed Project Site. These habitats provide shelter, navigational structure and connectivity within the Proposed Project Site for wildlife. **The proposed Grid Connection and Substation access route would be within these habitats.**

One habitat within the Proposed Project Site is **bog**. This natural feature can do something almost no other ecosystem can. Bogs lock away vast quantities of carbon, provide a home for critically endangered or protected wildlife, absorb and slowly release floodwater during increasingly chaotic winter inundations. A triple function that is of enormous benefit.

<https://www.weforum.org/stories/2025/02/peatlands-store-carbon-climate-change/>

There is overwhelming evidence in favour of peatland restoration as a benefit for climate, biodiversity, water and people. Bogs should not be allowed to be used for Industrial Development.

Professor of Geomorphology at the Department of Geography at Trinity College Dublin Dr Mary Bourke (who is working with the Wicklow Mountains National Park project) has said that bogs are the “secret weapon “in our Irish landscape.

<https://www.rte.ie/news/regional/2026/0327/1565445-bog-project-wicklow/>

National Parks and Wildlife Service Scientific Advisor and Research Director DR Shane Regan said that a bog can absorb about two tonnes of CO2 from the atmosphere per hectare every year.

Restoration of peatlands is worth investing in, not **the destruction of a sensitive carbon-rich landscape** that currently acts as a vital natural sponge for water and a store for greenhouse gases. Bogs can be a cost effective element of the response to climate change.

Ireland faces an acute water crisis – in 2025, drought affected 49 water supplies across 15 counties. The restoration of bogs can deliver water filtration, carbon drawdown, flood mitigation and drought buffering.

Let nature do its work.

Mycorrhizal fungal create a symbiotic, underground network of mycelium that connects the roots of trees and plants, **even across different species**. Trees use this network to transfer carbon, nutrients and water. The landscape is not just a collection of individual trees and plants but a highly connected, interactive and cooperative community.

The landscape is alive.

- The introduction of a Strategic Industrial Development along with associated disturbance and potential cumulative impacts would result in a degradation of these functional habitats, **contrary to the requirements of the EU Birds Directive and EU Habitat Directive and relevant policies to protect biodiversity.**

Trees and plants within the Proposed Project also provide a food source for birds and pollinators.

Our native Irish honey bee (Apis Mellifera Mellifera) is under threat. **It has been designated as endangered by the EU.** It has been recorded within the Proposed Project.

- **Mayo Abbey Wetlands Project** has a community beehive supporting this threatened species (c2km from the proposed Grid Connection and Substation). Its habitat

warrants protection - the Irish honey bee can fly 3-4km in search of a food source. Honeybees tend to return repeatedly to the same nectar sources.

Professor Grace McCormack, Head of School of Natural Sciences at University of Galway, said given the global loss of biodiversity and climate change, **it is unthinkable that Ireland would allow this dark bee to become extinct or severely impacted.**

<https://nihbs.org/2025/07/31/protecting-the-native-irish-honey-bee-an-interview-with-professor-grace-mccormack/>

“The history of the black bee in Ireland has been documented since as far back as the 7th century when beekeeping was recorded and a set of bee laws forming part of the Brehon laws. Beeswax has also been found in archaeological sites dating from 3000 BC in the west of Ireland.”

<https://theconversation.com/why-early-medieval-ireland-had-laws-for-bees-283168>

The Native Irish Honeybee has adapted to the unique climate in Ireland. **We are the last stronghold of the European black bee and custodians of a genetic heritage of European and National significance.**

The loss of bogs and heathlands can have **serious consequences for pollinators** because these habitats provide food, shelter, and breeding areas for many species of bees, butterflies, hoverflies, moths, and other insects. Without them, we would have fewer flowers, plants, and trees.

Bat species within the Proposed Project would be **adversely affected** through habitat disturbance and loss, displacement from established foraging areas, and disruption of commuting routes.

- Seven of Ireland's nine resident bat species were recorded/EIAR:
Myotis species, Leisler's Bat, Brown long-eared Bat, Nathusius' pipistrelle
Common pipistrelle, Soprano pipistrelle, Lesser Horseshoe Bat

This demonstrates the exceptional ecological value of the Proposed Project Site. Such a high level of bat diversity indicates the availability of a wide range of suitable habitats and resources, **highlighting the site's importance for bat conservation at both a local and regional scale.**

There is also connectivity of suitable bat habitats within the wider landscape, enabling bats to move between foraging, commuting and roosting areas.

- Existing features such as hedgerows, treelines, woodland patches, watercourses, and areas of semi-natural vegetation provide **linked habitat corridors** that facilitate bat movement and support ecological connectivity.

6.4.1.3.6 Treelines (WL2) “The proposed onsite substation and proposed new tracks will result in the loss of some treeline habitats”.

- The loss of this habitat would result in a reduction in habitat availability and connectivity for bats.
- Functionality for bats is not just structural; it depends on continuity of linear features across the landscape. Simply replanting or allowing regrowth does **not guarantee restoration of the ecological function** used by commuting and foraging bats.
- The presence of **an established roost**, together with documented commuting routes and high levels of foraging activity, demonstrates that the Proposed Project Site forms part of a wider bat habitat network of ecological importance.
- The Lesser Horseshoe Bat, Brown Long-eared Bat and Myotis spp. are **highly sensitive to habitat fragmentation**. Short-term **removal of linear features** would **disproportionately affect these species**.
- Bats may abandon traditional commuting routes.
- Foraging efficiency reduced.

Ash Trees are present within the Footprint of the Proposed Grid Connection and Substation

- When healthy trees are left standing, they pass on, recombine, and **reshuffle beneficial genes** into their seeds and pollen. Genetic sequencing proves that the younger generation of Ash trees resulting from these survivors possesses a **superior genetic makeup** to resist the disease.
- Cutting down a healthy tree permanently deletes vital gene combinations from the local ecosystem.
- Organizations like Teagasc rely on these living, field-tested survivors to build up a **national gene bank**.

<https://www.mayo.ie/news/ash-dieback-survey>

PRF-I (Potential Roost Features) - “supporting features with the potential to accommodate individual bats or small numbers of bats.”

Trees with PRF-Is to Be Removed - Figure 6-1 - are within the Proposed Grid Connection and Substation Footprint.

- The EIAR describes these trees as “limited” without explaining **cumulative importance** - **PRF-I features still have ecological value**.

PRF-Is are still functionally important habitat components, especially when;

- distributed along commuting routes
- used as temporary night roosts
- providing shelter between foraging bouts

It can not be demonstrated beyond reasonable doubt that there will be no significant adverse effects on bat populations or their habitats due to the loss of some treeline habitats.

- Desk studies only show where roosts have been recorded, not where bats are **actually using** the landscape **today**.

Acknowledged under-recording

3.4“Despite manual checking, a level of underrepresentation is still expected for these two species”.

3.2.6.2 The Underground Sites assessment relies primarily on the Geological Survey Ireland mapping system, the University of Bristol Speleological Society cave database and the National Monuments database. While these are valuable resources, **there is no evidence that detailed local archaeological research was sourced and reviewed**. In particular, “An Archaeological Survey of Mayo Abbey Parish” appears not to have been consulted.

- This local archaeological survey contains records of souterrains and other subsurface features that could plausibly be used by **Lesser Horseshoe Bat** for roosts.

Given the confirmed presence of seven protected bat species, active roosts, and the importance of the surrounding habitat for feeding and movement, the findings suggest that the site is of greater ecological sensitivity than would be compatible with a Strategic Industrial Development.

Birds. All species of wild birds that occur naturally in Ireland **are fully protected at all times** by the Wildlife Act and relevant amending legislation.

The presence of nine Annex I species protected under the EU Birds Directive, together with numerous Red-listed Birds and Amber-listed Birds of Conservation Concern in Ireland (BoCCI), indicates that **the Proposed Project supports a rich variety of habitats and provides important breeding, feeding, wintering, roosting, and migratory resources.**

- The diversity and abundance of bird species demonstrate that it is an **area of significant ecological importance**. It functions as a valuable and diverse habitat supporting multiple bird populations throughout the year.

The Proposed Grid Connection and Substation access route would be within these habitats, as would the Proposed Grid Connection and Substation Site.

Sparrowhawk

Sparrowhawk play an **important role in nature** by keeping bird populations balanced. By hunting weaker or sick birds, they help keep other bird species healthy and strong. This species build their nests **often in the same spot year after year**.

- **Residents records Sparrowhawk 2026:**

Turbine 2 (T2) Observed carrying food, indicating probable **nest at T2/Mast**

Turbine 5 (T5) Observed carrying food, indicating probable **nest at T5**

Turbine 6 (T6) Observed flying low

(Sparrowhawk - “**Confidential Appendix 7-5** contains sensitive records of protected species breeding and roosting sites.”)

Curlew

Adult Curlews are strongly Philopatric - return to the same nesting site every year. They have been recorded by residents within the Footprint of the Proposed Project 2026 - **suggesting the species remained resident within the site area throughout the breeding period.**

- **Residents records Curlew 2026:**

Turbine 6 (T6) Heard: April - June

Turbine 6 (T6) Recorded on Merlin App

Drumady Lake - heard, seen and recorded on Merlin App

Kilbride/Cloonbaul - Seen and Heard calling **July 2026** while flying over Kilbride (H022) and flew in the direction of the Cloonbaul/bog.

- **When a bird calls out, it is calling to another bird** – which indicates more than one bird in the area.

(Curlew – “**Confidential Appendix 7-5** contains sensitive records of protected species breeding and roosting sites.”)

Meadow Pipit

- **Red Listed species**, following severe population declines (Countryside Bird Survey).
- “Lower importance” (at local level) is therefore **ecologically erroneous**.
- This species is severely compromised by a lack of high-quality habitat - it nests exclusively on the ground in open landscapes (peatlands, bogs, and rough grasslands).

The decline of the Meadow Pipit directly impacts the Common Cuckoo (*Cuculus canorus*) because **the Meadow Pipit is the Cuckoo’s primary host species in Ireland.**

Lesser Black-backed Gull

Lough Mask is one of the most important inland gull breeding sites in the country, with Nationally important populations.

- **7.3.1** “The potential for likely **significant effects** was identified for the Lough Mask SPA.”
- **7.3.1** “in the form of potential direct habitat loss, disturbance/displacement and collision risk for the Lesser black-backed gull.”

- **Significant Ex-Situ Impacts:** While the site sits outside the SPA boundary, it falls within the documented **core foraging range** of the Lesser Black-backed Gull. Under Article 6(3) of the EU Habitats Directive, any adverse impact on these birds or their foraging habitat constitutes a significant **ex-situ impact on the SPA population itself**, undermining its binding conservation objectives.
- **Under the Holohan CJEU precedent**, an applicant cannot simply point to a map and say "there is plenty of room elsewhere".
- **Residents Incidental observations 2026:**
Proposed Substation and grid Connection - seen following tractors and silage machinery
Turbine 2 (T2) - seen following tractors and silage machinery
Turbine 6 (T2) - seen following tractors and silage machinery

Badgers use the same tracks and paths for generations, spanning over a hundred years.

Badgers are creatures of habit and follow regular pathways between their setts and foraging grounds.

- **Sightings of Badgers by Residents:** Harefield, Knockaunakill, Kilbride
- **Residents Incidental observations 2026:**
Turbine 6 (T6) - Snuffle holes
Tracks towards Turbine 7 (T7), tracks continue on to the Proposed Substation
Proposed Substation - Snuffle holes

Marsh Fritillary Butterfly (*Euphydryas aurinia*) has suffered severe decline and is now a conservation priority species, Annex II.

- The EIAR includes a Confidential Appendix 6-7 relating to Marsh Fritillary **larval webs** and **suitable habitat**.
- This is significant ecological evidence that the site provides suitable breeding habitat for this protected species - **Devil's-bit Scabious** is its main larval food plant.
- **Devil's-bit Scabious is found abundant throughout the Proposed Project Site.**

6.4.2.4 "No webs were identified within the footprint of the Proposed Project, with the nearest web located approximately **2.5m** from the temporary hardstand areas associated with **Turbine 3.**"

- **The finding of no webs in the footprint during one survey period cannot by itself demonstrate that the construction footprint has no functional significance to the species**, particularly where suitable habitat is present, and occupied habitat occurs only metres away.
- **"Outside the footprint" does not mean "no impact".**
- The Proposed Project and associated infrastructure, including access tracks and construction works, have the potential to result in **direct and irreversible** habitat loss, fragmentation and disturbance.

- Attempting to artificially displace this population to adjacent fields **does not** legally compensate for the physical destruction of their habitats.

“Significant” dust effect appears to be changed by mitigation, but the mechanism isn't completely clear.

- **The mitigation does not clearly explain** how dust will **actually be prevented** from reaching the habitat **or how it reduces the dust-related effect from significant to non-significant.**
- Dust deposition could cause: “a short-term, slight negative effect” but the EIAR then calls that effect **significant at County Scale.**
- **Residents Incidental Observations 2026:**
 Turbine 2 (T2) - Devil’s bit Scabious
 Turbine 2 (T2) / Mast - Marsh Fritillary Butterfly
 Turbine 3 (T3) - Devil’s bit Scabious
 Turbine 4 (T4) - Devil’s bit Scabious
 Turbine 6 (T6) - Devil’s bit Scabious
 Proposed Grid Connection (along drain at Proposed Linear Planting) - Devil’s bit Scabious.
 Access road L -15053 - from the discarded tree trunks to the turn off/road for T1 (both sides of the road – and continues along both sides of L-15053 to T3).

(Sightings and recordings by local residents, within the Proposed Project have been documented online, and by photographic and video evidence).

<https://records.biodiversityireland.ie/>

<https://www.irishbirding.com/birds/web>

Merlin App

7. Japanese knotweed 3.3.1.8 Invasive Plant Species

- This species was recorded within the footprint of the Proposed Project.

8. Water contamination risk

3.1.4.2 Site Hydrogeology “no significant karst was encountered in the borehole at the proposed borrow pit location.”

- Report received from the **Environment Section** (2660398 – refused Wind Farm) - “The report does conclude however, with a recommendation to investigate a potential **alternative location** within the site for the proposed **borrow pit**, in order to reduce the possibility of impacting on the **extremely vulnerable Karst Aquifer within the site.**”

The Proposed Grid Connection and Substation is located in an area where **historic wells** have been identified and where flooding and groundwater emergence are known to occur.

- The presence of Wells recorded on the historic 25-inch Ordnance Survey map at **Receptor H003/Cloonbaul and a Well (CH8) recorded within the Proposed Grid Connection and Substation** site, together with a **disused well** near Turbine 7 (pump house is still visible), indicates that groundwater is an important feature of the local environment.
- Mayo has an intricate network of streams, rivers and lakes. **Local tributaries flow into the River Moy SAC.**
- April 2024 Knockaunakill, Scientists Mapped (added dye) to a Swallow Hole near H006. The dye drained into the River Moy, via the Meander, and the Manulla River.

9. Fire

Areas of dense scrub, particularly European gorse, are present across the Proposed Project, including on cutover bog, along field boundaries, drainage ditches and woodland edges.

- Dense vegetation such as gorse, heather, bramble and dry tussocks, together with old rotting tree stumps, and conifer plantation provide a **substantial source of combustible material**, particularly during prolonged dry weather.

The site's **rural and remote location** may result in extended emergency response times from fire and rescue services.

- Given the presence of electrical infrastructure (substation and turbines) and surrounding **highly combustible fuels** including bog, heath, scrub, and forestry, any fire incident could develop significantly before intervention is possible.
- A significant fire event occurred within the Proposed Project Site in April 2013.

10. Noise

Mayo Abbey area is a quiet rural location.

12.4.2.1 Choice of Monitoring Locations - "Site visits by survey personnel were carried out during morning and afternoon periods; during these visits, **primary noise sources contributing to noise environment were noted as being occasional local traffic noise and farming activity, birdsongs and distant agricultural activity.** In respect of night-time periods, when noise due to traffic on local roads, agricultural activities and other sources tend to reduce, **there was no indication of any significant local night-time sources of noise at any location. No significant sources of vibration were noted at any of the survey locations.**"

12.4.3 Construction Noise Calculations - "There will be vehicular movements to and from the Site that will make use of existing roads. There is the potential for generation of

significant levels of noise from these activities. **In the absence of specific details on the plant items and construction methods to be employed**, a set of **assumptions** must be made to predict and assess the likely noise emissions from these activities”.

12.6.2.1.2 Vibration - “Rock breaking activity will likely generate the highest levels of vibrations through the ground. **Empirical data for this activity is not provided in BS 5228-2**, however the likely level of vibration from this activity is expected to be substantially below the vibration criteria for building damage based on experience from other sites. AWN Consulting Ltd (the author of this chapter) has previously conducted vibration measurements under controlled conditions, during trial construction works **on a sample site** where breaking was carried out.”

- **Lack of empirical data** – The statement acknowledges that BS 5228-2 **does not** provide empirical data for rock breaking vibration. This means the assessment is not directly supported by the primary standard being referenced.
- **Reliance on professional judgement** – The conclusion depends heavily on experience from other sites rather than site-specific measurements or modelling. This introduces uncertainty.

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- “During the operational phase, noise will arise from the onsite 110kV substation.”

Noise pollution can be detrimental to wildlife and drive local animals from their habitats. It can cause birds to relocate, therefore disrupting breeding and nesting patterns. Habitat degradation results in fewer birds in the area.

- Many species, animals, such as birds or frogs, rely on particular calls to attract mates. Most are low-pitched, and some animals have been making their voices higher in order to **compete with the low-frequency sounds of industrial development**.
- In noisy environments, the breeding pool becomes much smaller as the range is far less, affecting population sizes and diversity.

Birds play an integral role in the ecosystem and provide essential services for humans. They consume insects, helping to control the pest population and prevent pest-induced damage to trees and crops. Birds also disperse seeds and pollinate plants.

- Songbirds have a positive impact on human well-being. People find birdsong reassuring and relaxing because, **for thousands of years, people have learned that they are safe when birds sing**.
- People living in noisy areas not only suffer from the direct harmful effects of noise pollution on their health and well-being, but also suffer indirectly from the negative impacts that noise pollution has on birds.

Animals in noisy environments sometimes show altered levels of stress hormones, which are linked to increased stress responsiveness.

- A phantom road experiment reveals traffic noise is an invisible source of habitat degradation: <https://www.pnas.org/doi/10.1073/pnas.1504710112>

11. Health Impact

Major electricity infrastructure, including high-voltage power lines, transformer stations and substations, generates non-ionising radiation in the form of extremely low-frequency electromagnetic fields (ELF-EMFs).

- In 2002, the International Agency for Research on Cancer (IARC) classified extremely low-frequency magnetic fields as **Group 2B ("possibly carcinogenic to humans")**, based primarily on limited epidemiological evidence linking long-term exposure to an increased risk of childhood leukaemia.

12. Depreciation of Property Value

There is substantial housing density in the area.

Just as the refused Wind Farm (2660398) was found to negatively impact surrounding property values due to its intrusive nature, a permanent industrial electrical installation immediately adjacent to residential homes will create a lasting stigma and depress local property values.

A **2023 University of Galway** study specifically examined the effect of proximity to wind turbines (Proposed Project) on house prices in the west of Ireland. The study found a **statistically significant negative effect on house prices.**

- **The qualities described throughout my submission** are not simply individual elements of the landscape; together, they form the character, identity and sense of place of Mayo Abbey
- The rural landscape, the open countryside, the ancient stone walls, the hedgerows, the fields, the peace and tranquillity, and the strong connection between the people and the land.
- What is at stake is therefore not only the physical landscape, but a cherished way of life, the identity of the community and the qualities that make Mayo Abbey a special place to live.

Conclusion:

I am a Marine Scientist and I have a long-standing interest in the natural environment. I have also undertaken bird surveys at Clare Lake, Claremorris, Co. Mayo with ornithological

guidance from BirdWatch Ireland, and remain a current member. My professional and practical experience informs the environmental and ornithological observations made in this submission. **I am passionate about nature and about ensuring it is preserved and passed on to future generations to enjoy.**

- **The proposed Grid Connection and Substation has no independent operational purpose other than serving the refused wind farm.**
- **“Outside the footprint” does not mean “no impact”.**

We are custodians of the land.

Tá cluing na marbh leis an gaoith.

With gratitude,

Olivia Galvin

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