

Dear An Coimisiún Pleanála,

I am writing to object to the Cunlaghfadda Green Energy 110kV onsite electrical substation development on the following grounds:

1. **Project splitting.** Why is this substation and its cabling, needed to connect Cunlaghfadda Green Energy windfarm (PL16.501853) to the national grid, being assessed separately and in isolation? What is this substation for if not for the windfarm? Such project splitting flies in the face of a number of High Court rulings that a windfarm and its connection form a single project under EU environmental law, and I urge An Coimisiún Pleanála to refuse planning permission.
2. **Cultural heritage.** The townlands which will be affected by the proposed substation+windfarm (Knockroe, Cunlaghfadda, Harefield, Cloonbaul and Knockaunakill) largely form part of the parish of **Mayo Abbey**. The nearest church, school, pub, shop, graveyard, community centre, creche and GAA club are all in Mayo Abbey. Despite this, Mayo Abbey barely gets a mention across the planning application documentation, which instead favours Claremorris, Castlebar and Balla, which are all miles away. The overall downplaying of the importance of Mayo Abbey in the planning application documents is thoroughly misleading. Mayo Abbey is the ancient capital of Mayo, and the village which gives the county its name. It has been described as “one of the most important monastic sites in Western Europe” (Boyle, 2021) and “a major centre in the Celtic-Anglo Saxon Christian world in the 7th and 8th century” (Mayo Abbey Heritage Committee, 2023). Archaeological remains radiate out from its centre across the parish, including as yet unresearched monuments. In Cloonbaul, where this substation is to be located, an enclosure (MA-101-106 National Monuments Service, 2026) which falls within the development footprint (14.3.9 Table 14-10 'CH10') may be Neolithic in origin. Ireland already has a long list of lost/ destroyed/ vandalised heritage, the most infamous being Woodquay in Dublin, and Cloonbaul too has suffered huge loss: a Late Neolithic timber circle, carbon-dated back to 3000BC, was excavated during the Corrib Gas Pipeline works in the 2005 (<https://excavations.ie/report/2005/Mayo/0014121/>). All that survives now are a few artefacts and a file in the National Museum. A recent Heritage Council funded LiDAR survey (2023) underlined just how much archaeology remains to be discovered, highlighted and researched across the locality. It can be argued that the area is potentially a deeply integrated Neolithic landscape with continued habitation down to modern times, and therefore what remains across Mayo Abbey today must be preserved *in situ*. Enough has been sacrificed by this historic community already and I urge An Coimisiún Pleanála to safeguard what remains and refuse planning permission.
3. **Flooding.** The location for the windfarm, inextricably linked to this substation, is largely bog. Bogs are giant sponges, with an enormous capacity to hold and store water. Climate crisis modelling has forecasted wetter winters for Ireland and more extreme weather events, meaning that the future potential for/ increased frequency of flooding in this area is very real: “Winter: Rainfall could increase by up to 24%, elevating the risk of flooding in various regions” (Met Éireann, 2025). The townland where I live (Knockaunakill), has predictably experienced alarming flood events in recent years, the most recent being Storm Bert Nov. 2024, during which access to/ from the area was blocked by floodwaters over several days, and floodwaters came to within c10m of our back door. This flooding event was the lived experience of locals, but it has not been included in the application's Flood Risk Assessment (Vol. 3 Appendix 9-1). The amount of concrete which will have to be poured into the bog in order to secure seven turbines, as well as planned substation, and resulting ground compaction, will drastically reduce floodwater absorption capacity across the area. For

every cubic metre of concrete poured into the bog, our locality will lose the equivalent in rainwater absorption capacity. This means that what saved us in Nov. 2024 will be hugely compromised in future flooding events. Add to this the expected sedimentation and run-off from earthmoving and construction works clogging ditches and drains across the site. These factors combined will put not just my but all homes, farms and businesses bordering the windfarm at an even greater risk of flooding, flash-flooding and destruction, and I urge An Coimisiún Pleanála to apply the Precautionary Principle and refuse planning permission.



Fig. 1: Storm Bert Nov. 2024 flooding between H006 and proposed Turbines 6 and 7 and substation

4. **Red List species.** The site of the proposed Cunlaghfadda Green Energy windfarm, inextricably linked to this substation, is home to several protected species, including two Red List birds: snipe and curlew. Curlew observed on the site in 2022 are “associated with a nationally important breeding population” (7.3.7.12). It was not observed 2023-2025 (7.5.2.4), but across May-June 2026 it has been heard and recorded by observant locals, including myself. The curlew is back and is using the site. There are less than 300 individual breeding curlews left in the country, constituting “an alarming loss of at least 96% over just 30 years since the late 1980s” (Colhoun *et al*, 2022). As a Red List species, the curlew is included in Ireland’s Natura 2000 Action Framework as a conservation priority, and under the EU Birds Directive member states are obligated to protect its breeding habitats. This site has been chosen by this highly endangered creature and it should not be sacrificed to industrialisation.
5. **Invasive species.** Japanese knotweed exists in worryingly large stands across the southern half of the proposed windfarm location, including along the sides of the road earmarked for widening, along which all plant and materials for the construction of this substation will travel. As part of my MSc, I studied invasive species in depth and the capacity of Japanese knotweed to spread and persist is truly frightening, with it being “rated among the 100

worst invasive alien species in the world by the Global Invasive Species Programme” (INVAS Biosecurity, 2022). I acknowledge that the Cunlaghfadda Green Energy project surveyors have mapped and put in place mitigation measures for the containment/ treatment of the species, but I am deeply concerned that it does not specifically state that the recognised best practice *minimum* of 3-5 years (*ibid.*) of consistent treatment with glyphosate based chemical herbicide, needed to completely destroy the plant *before* any disturbance of the soil, will be adhered to, i.e. will construction/ movement begin on site whilst the plants are still very much alive? The potential for the spread of Japanese knotweed further across and well beyond the project area during construction works cannot therefore be discounted, and I urge An Coimisiún Pleanála to apply the Precautionary Principle and refuse planning permission.

6. **Lack of engagement.** In a meeting with An Bord Pleanála 09/05/2024, the applicant undertook to engage with local residents/ landowners across 2023-2024 in relation to the development of the 110kV grid connection (see snippet below from Case VC16.319153, Records of First Meeting 319/P319153). The first time we actually became aware of this grid connection was when communication regarding the windfarm began in March 2026. Prior to March 2026, we had no knowledge whatsoever of the planned windfarm or grid connection.

The prospective applicant has employed a community liaison officer available to provide an interface for the community to address any queries or concerns raised in relation to the proposed development. A project website has been developed to provide information regarding the proposed development to the local community. In Q3 and Q4 of 2023, the prospective applicant consulted with local landowners/residents in relation to baseline surveys and set out details of the proposed project. In Q2 of 2024, the prospective applicant will engage with locally elected representatives, issue a letter to residents within 2 kilometres of the proposed site outlining the nature of the proposed development, advertise details of the development in local media and make door-to-door visits to residents in the vicinity of the proposed project. In Q3 2024, a public exhibition event will be held in the local community hall. As part of community engagement, the prospective applicant has also organised a tour of an operational wind farm.

Yours faithfully,
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(H006)