

Proposed Cunlaghfadda 110kV Electrical Substation

Cloonbaul, County Mayo | An Coimisiún Pleanála Case VA16.324429

Submitted by	Dr Phelim Ryan
Address	Knockaunakill, Mayo Abbey, Co. Mayo, F12 F2N3
Date	29 August 2026
Case type	Electricity Development Application under section 182A
Development	110kV onsite electrical substation, loop-in grid connection and associated infrastructure and works

To the Commissioners of An Coimisiún Pleanála:

I, Dr Phelim Ryan, make this submission objecting to the proposed 110kV onsite electrical substation, loop-in grid connection and associated works at Cloonbaul. I live at Knockaunakill in the immediate Mayo Abbey area. My husband and I farm locally, including land close to the wider proposed project, and our holding participates in the Organic Farming Scheme. I therefore have a direct and long-term interest in the protection of this landscape, its water environment, archaeology, biodiversity and rural character.

I support the transition away from fossil fuels. **That support does not require the approval of every renewable-energy proposal in every location.** Climate action is **not a planning trump card**, and a grid connection does not become environmentally acceptable merely because the equipment is electrical. The question is whether this particular development, on this particular site, has been properly justified and lawfully assessed.

Executive summary and request

I respectfully request that the Commission refuse approval. At minimum, no decision granting approval should be made while the connected wind-farm appeal and the adjacent/linked BESS proposal remain unresolved. The principal grounds are as follows:

- The substation is not a genuinely independent project. The applicant's own EIAR repeatedly defines the wind farm and grid connection together as the 'Proposed Project', while pursuing separate consenting routes. A decision must therefore address the whole functional project and the serious sequencing problem identified by Friends of the Irish Environment (FIE).

- The application site contains or overlaps a recorded archaeological site, MA101-106, identified in the 1995 Mayo Abbey Archaeological Survey as an **enclosure of 'immense importance'**. The applicant's desktop assessment does not engage with that survey and instead reduces visible banks and enclosures to possible animal pens or field boundaries. That is not an adequate treatment of a known, research-sensitive archaeological landscape.
- The development lies within the wider prehistoric and early-medieval cultural landscape of Mayo Abbey. Nearby discoveries include a rare Late Neolithic timber circle at Kilbride, while independent LiDAR work has identified further earthworks and settlement features. Preservation in situ and non-destructive investigation should take precedence over construction-led testing and preservation by record.
- The site is an obvious candidate for nature restoration. The applicant itself records cutover bog, transition mire, species-rich wet grassland, Annex I Molinia meadow, extensive Devil's-bit Scabious, a Marsh Fritillary breeding population and probable Curlew breeding. Regulation (EU) 2024/1991 now requires Ireland to plan and deliver ecosystem restoration, pollinator recovery and improvement in agricultural-ecosystem indicators. Industrialising this site would squander rather than realise that potential.
- The Marsh Fritillary evidence demonstrates ecological volatility and the limits of snapshot surveying: no larval webs were recorded in 2023 or 2024, but 41 active webs were found in 2025. **A moving insect population cannot be protected by drawing a narrow line around the webs** found in one year and assuming the remainder of the habitat is dispensable.
- The alternatives assessment is materially weak. The chosen private-land route is admitted to have a greater potential to affect undiscovered subsurface archaeology than a public-road option, and the larger 110kV substation has greater permanent landscape impact than the earlier 38kV option. The claimed convenience of a shorter connection cannot outweigh an irreplaceable archaeological and ecological resource.
- The combined and cumulative effects of the wind farm, substation, grid connection, BESS proposal, peat disturbance, access works, drainage changes and progressive industrialisation have not been resolved through a single coherent consent decision.

1. The Commission must assess the real project, not an isolated piece of it

The application description refers to an onsite 110kV substation and loop-in connection. The applicant's own documentation, however, removes any doubt about its purpose. Chapter 14 states that the substation is intended to connect the proposed wind farm to the national grid, while Chapter 2 defines the 'Proposed Project' as comprising both the wind farm and the grid connection. It then explains that the components are being advanced through separate applications to Mayo County Council and the Commission. [1]-[3]

This is not a semantic point. The substation has been selected, sized and located to serve the proposed Cunlaghfadda Wind Farm. Its claimed climate and energy benefits are likewise derived from electricity the wind farm would generate. **Without the wind farm, the asserted need for this particular onsite substation at Cloonbaul is fundamentally altered. Conversely, granting the grid infrastructure would create a powerful planning foothold for the wind farm or a reconfigured future energy complex.** The Commission should not grant the enabling component first and leave the public to fight the principal development later.

2. FIE's 'salami slicing' concern is well founded

I expressly adopt and support the concern raised by Friends of the Irish Environment in its submission on this case: the wind farm and its substation have been separated across different consent procedures even though they form one functional project. FIE has aptly described this as 'salami slicing'. [10] The fact that a common EIAR has been lodged does not by itself cure the decision-making problem. Environmental information must not merely exist on a server; it must inform a coherent decision on the whole project at a stage when refusal, redesign and genuine alternatives remain open.

EU law requires an overall assessment and guards against project splitting. The European Commission's 2021 guidance on the EIA Directive summarises the Court of Justice case law: the Directive's purpose cannot be circumvented by splitting projects; projects that may together have significant effects must be assessed as a whole and cumulatively. The same principle appears in cases including *Ecologistas en Accion-CODA* (C-142/07) and *Umweltanwalt von Karnten* (C-205/08). [11]-[13]

Here the risk is concrete, not theoretical. Mayo County Council refused the wind-farm application, planning reference 2660398, on 14 July 2026. That refusal is now under appeal. [16] Meanwhile, the Commission is asked to authorise the wind farm's grid-enabling infrastructure under VA16.324429, and Mayo County Council is separately considering the Cloonbaul BESS proposal under reference 2660653. [17] The planning system is therefore being asked to decide interconnected elements in fragments, on different timelines and before the final form - or even the viability - of the overall development is known.

The Commission should refuse the application as premature. In the alternative, it should defer any decision capable of authorising construction until it can assess the final, lawful and consented generating/storage project to which the substation would connect.

3. A known archaeological site cannot be treated as an afterthought

The most serious site-specific issue is MA101-106, an archaeological enclosure recorded at the substation site in the independent Mayo Abbey Archaeological Survey of 1995. That survey described the feature as being of 'immense importance'. [18] This is not a vague claim that archaeology might exist

somewhere in the vicinity. It is prior documentary evidence identifying a specific monument/site within the development area selected for major electrical infrastructure.

The applicant's Chapter 14 does not cite or meaningfully engage with the 1995 survey. Its stated desktop sources include national databases, historic mapping, aerial photography and Excavations Bulletin, but the readily available independent survey that directly addresses Mayo Abbey's archaeological landscape is absent. [3] That omission matters because the EIAR then interprets curvilinear and rectilinear banks (CH10) as possible former field boundaries or animal enclosures, notwithstanding that they are not shown on the 1839 or 1896 Ordnance Survey maps. The report confirms that CH10 is visible on aerial photography and on the ground, and lies within the development footprint for the temporary compound, access track and peat/spoil management area. [3]

In other words, the EIAR acknowledges physical enclosure features inside the works footprint, but reaches a low-key interpretation without confronting the earlier specialist survey that assigned immense importance to MA101-106. A desktop assessment that omits the most directly relevant local archaeological source is not a reliable baseline. **An impact assessment cannot be robust where the baseline has been selectively thinned.**

4. Mayo Abbey is an integrated cultural landscape

The site must be understood within the wider historic landscape of Mayo Abbey (Mag nEo na Sacsan), an internationally important early-medieval monastic centre associated with St Colman, Lindisfarne and the wider Christian world of early medieval Europe. **Professor Dame Rosemary Cramp described Mayo Abbey as a site of outstanding importance in the history of European monasticism.** The surrounding landscape contains ringforts, enclosures, field systems, fulachtaí fia, burial grounds, ecclesiastical remains, vernacular structures, routeways and long-term settlement evidence. It is not an empty backdrop between dots on a monuments map.

Recent work makes the prehistoric dimension especially important. Archaeological excavation at nearby Kilbride identified a rare Late Neolithic timber circle, Grooved Ware pottery, burnt bone and ceremonial features. Barton notes that only a handful of comparable timber circles had been excavated nationally and that the characteristic ridge-top setting makes the wider development area archaeologically prospective. [4] The applicant's own heritage chapter records three polished stone axeheads and a further stone axehead/whetstone from Cloonbaul, as well as a field system in neighbouring Knockaunakill. [3] These are not isolated curiosities; they are mutually reinforcing evidence of deep human use of the landscape.

Photographs taken in the adjoining townland of Knockaunakill are included at Appendix B. They show repeated stone alignments, banks, terraces and apparent compartment boundaries surviving in pasture. Photographs alone cannot determine whether these features are prehistoric, later agricultural boundaries, exposed limestone or a combination of those elements. That uncertainty is precisely why they matter.

Chapter 14 already records a field system in Knockaunakill; the visible features raise a legitimate research question as to whether that field system, MA101-106 and other enclosures form part of a wider and potentially prehistoric network of fields, settlement enclosures and routeways. The possibility of interconnected Neolithic or later prehistoric field systems should be tested by qualified archaeological survey, not dismissed through project-boundary thinking. Further views show subtle circular or curvilinear organisation in the pasture and possible low boundary lines, adding to the case for systematic fieldwalking, LiDAR interpretation and geophysical survey.

The 1995 Mayo Abbey Archaeological Survey also records a wedge tomb in Harefield, close to the southern end of the proposed wind-farm area. The applicant's heritage material identifies wedge tomb AH41 within the wider study area, approximately 630 metres north-east of T4. [3], [18] Wedge tombs are Neolithic funerary monuments and among the youngest of Ireland's Stone Age monument classes. [25] Its proximity matters: the Harefield tomb, the Late Neolithic timber circle at Kilbride, MA101-106, polished stone axeheads, the recorded Knockaunakill field system and the newly photographed apparent features form a geographically coherent concentration of prehistoric evidence. **They cannot sensibly be assessed as unrelated dots simply because modern townland or application boundaries divide them.**

The 2023 LiDAR survey commissioned by the Mayo Abbey Heritage Committee has also identified previously unrecognised earthworks, enclosure systems, possible routeways and settlement features around Mayo Abbey. Palaeoenvironmental research from **Lough Fark** demonstrates millennia of vegetation and land-use history and supports the interpretation of the area as a coherent archaeological landscape rather than a collection of isolated monuments. [5]

Against that background, the proper response to MA101-106 is preservation in situ and research-led, non-destructive investigation. The applicant proposes pre-construction test trenching, monitoring and, if necessary, 'preservation by record'. [3] That is not an adequate answer. Preservation by record is destruction with paperwork. Once an enclosure, stratigraphy or associated deposits are excavated away for a substation, future generations cannot revisit the site with improved methods or place new discoveries into their original context.

5. The archaeological mitigation is deferred and therefore uncertain

The Development Applications Unit requested a baseline study, site inspection, assessment of the wider archaeological landscape and a programme of targeted geophysical survey and archaeological testing. [3] Yet the decisive work is postponed until after permission. The EIAR's proposal to test trench CH8, CH9 and CH10 before construction concedes that the character and significance of the affected archaeology are not yet known.

This is precisely the wrong sequence for a site of recognised importance. The Commission should know the nature, extent, date and significance of the archaeological resource before it decides whether the development is acceptable. A condition requiring later investigation cannot repair an EIAR baseline that is presently insufficient, nor can it guarantee preservation in situ if important remains are found beneath a fixed, consented substation layout. The application should not be approved on the basis that archaeology will be discovered and negotiated away after the strategic decision has already been made.

6. The alternatives assessment favours engineering convenience over irreplaceable heritage

Chapter 3 shows that other connection arrangements were considered. Earlier layouts involved a 38kV onsite substation and underground routes to Dalton 110kV Substation using the public-road corridor. The final option uses a larger 110kV loop-in substation and approximately 982 metres of private-land cabling. [2]

The applicant's own comparison records two disadvantages of the chosen option that are central to this objection: it creates greater permanent landscape impact because of two end masts and the larger 110kV substation footprint; and it has a greater potential to affect undiscovered subsurface archaeology because the route crosses private improved grassland rather than remaining within the public-road curtilage. [2] The report nevertheless selects the option largely because it is shorter, reduces construction traffic and is convenient to the overhead line.

That is not a convincing demonstration that the selected location is environmentally optimal. It shows that the applicant traded a longer engineered cable route for a larger permanent installation within an archaeologically and ecologically sensitive landscape. Where the receiving environment includes a recorded enclosure of immense importance, the burden lies on the applicant to show that avoidance is impossible, not merely less convenient or more expensive. It has not done so.

7. Ireland's Nature Restoration obligations change the planning context

Regulation (EU) 2024/1991 on nature restoration entered into force in August 2024. It is binding EU law, not an aspirational biodiversity slogan. It requires Member States to put effective, area-based restoration measures in place across terrestrial, coastal, freshwater and marine ecosystems and to prepare national restoration plans. The implementing framework requires a draft national plan to be submitted by 1 September 2026; Ireland is now actively preparing that plan and commenced public consultation in June 2026. [6]-[9]

The Regulation does not mean that every degraded field is automatically a protected site, and the legal obligations fall primarily on the State rather than individual landowners. That does not make it irrelevant to planning. **An Coimisiún Pleanála is an organ of the State exercising a function that can either preserve or sterilise land with exceptional restoration potential.** It should not authorise permanent industrial infrastructure on an obvious candidate site without squarely addressing how that decision aligns with Ireland's binding restoration trajectory and the preparation of the national plan.

The Regulation is directly relevant in at least four ways. First, Article 10 requires Member States to improve pollinator diversity and reverse pollinator decline by 2030, followed by an increasing trend until satisfactory levels are reached. Second, Article 11 requires improving trends in agricultural ecosystems, including through the grassland butterfly index and high-diversity landscape features. Third, Articles 4 and 15 require restoration planning and measures against significant deterioration in relevant habitat areas. Fourth, the Regulation expressly requires coherence between restoration, climate and renewable-energy planning; it does not license renewable energy to consume the very land needed for biodiversity recovery. [6]-[8]

8. Cloonbaul should be considered for restoration, not industrialisation

The applicant's own baseline reads like a restoration prospectus. It records 23 habitat or habitat-mosaic types across the site, including raised bog, cutover bog, transition mire and quaking bog on cutover, wet grassland, hedgerows, treelines, scrub, ponds and drainage ditches. It identifies species-rich cutover bog with high Sphagnum cover; wet grassland that meets the criteria for Annex I Molinia meadows [6410]; extensive Devil's-bit Scabious; and a Marsh Fritillary population. [2]

The ecological value is not diminished simply because some parcels do not currently meet an Annex I threshold. Restoration law exists precisely because degraded ecosystems need to recover. The applicant itself cites the 2025 Article 17 reporting position that regenerating cutover with high Sphagnum cover may develop into embryonic active raised bog over longer periods. [2] A habitat's capacity to recover is a reason to protect hydrology and reduce pressure, not a reason to build before recovery occurs.

A coherent restoration programme could combine rewetting and drain management on cutover peat; removal or control of invasive conifer regeneration; appropriate low-intensity grazing or mowing of Molinia/Devil's-bit Scabious grasslands; retention and expansion of hedgerows and treelines; management of connected habitat patches for Marsh Fritillary; and protection of open wet grassland and peatland capable of supporting Curlew. This is an unusually strong opportunity to deliver climate, biodiversity, water-retention and cultural-landscape benefits in one place.

At an absolute minimum, the species-rich wet grassland, remnant raised bog, species-rich cutover bog, transition mire and their hydrological support areas should be excluded from development footprints and

protected from indirect drainage, fragmentation, lighting and construction effects. Wet grassland and bog are not leftover land. They are among the habitat types most depleted by drainage, reclamation, intensification and peat extraction in Ireland, and the remaining recoverable examples are precisely where the State's restoration effort must begin. A planning permission which forecloses that opportunity would move in the opposite direction.

The applicant offers a 1.16-hectare *Molinia*-meadow enhancement area and planting as mitigation. Those measures do not answer the larger question. Small developer-controlled enhancement parcels cannot substitute for retaining the integrity and future restoration options of the wider site. **Nor should restoration be treated as compensation for choosing an avoidably sensitive location when less damaging alternatives have not been exhausted.**

9. Marsh Fritillary: the survey results undermine the proposed mitigation

Marsh Fritillary (*Euphydryas aurinia*) is listed in Annex II to the Habitats Directive. The applicant mapped suitable habitat and carried out larval-web surveys from 2023 to 2025. No webs were found in 2023 or 2024. In 2025, 41 active larval webs were recorded: 36 in a core area of Annex I *Molinia* meadow and five in cutover bog and wet grassland. Five habitat parcels were assessed as being in Good Condition and a further five as Suitable (Under-grazed), largely because of abundant Devil's-bit Scabious. [2], [14]

That dramatic year-to-year change is crucial. It demonstrates that the butterfly uses a shifting network of suitable habitat and that absence in a particular survey year is not reliable evidence of ecological irrelevance. Yet the mitigation logic remains tied to the footprint and to webs found during a pre-construction survey. The EIAR accepts that three webs were found within five metres of proposed works elsewhere in the project, that suitable habitat would be lost, and that **unmitigated mortality could be significant at county scale**. It proposes fencing, an Ecological Clerk of Works and, if necessary, moving sods containing active webs and food plants. [2]

This is not precautionary avoidance but rescue mitigation after the site has been selected. Translocating a larval web is not equivalent to preserving the hydrology, vegetation structure, grazing regime, connectivity and metapopulation dynamics that sustain Marsh Fritillary over time. A five-metre construction-management buffer is especially unconvincing in the face of dust, drainage, vehicle tracking, scrub clearance and the demonstrated mobility of breeding locations between years.

The Nature Restoration Regulation's pollinator and grassland-butterfly provisions reinforce the correct planning response: protect and enlarge the habitat network, rather than permit its piecemeal narrowing and then label the residual arrangement a net gain.

Additional community research undertaken by me with my neighbour, Olivia Galvin, identified and mapped further occurrences of Devil's-bit Scabious in the wider project area. The photographs and indicative mapping are included at Appendix A. One photograph shows Devil's-bit Scabious prominently in the foreground, with the proposed BESS/substation area and grid-connection alignment marked indicatively beyond it. This does not, by itself, prove current Marsh Fritillary occupation at that exact point. It does, however, identify potentially suitable foodplant habitat which appears not to have been adequately reflected in the EIAR mapping or assessment. If these occurrences fall outside the applicant's mapped habitat parcels, that discrepancy is material and should be independently ground-truthed before any decision is made. The Commission should not assume that unmarked habitat is absent habitat.

10. Curlew, Kestrel and the wider bird assemblage

The applicant recorded a probable breeding pair of Curlew within the site in 2022 and accepted, on a precautionary basis, that the birds were associated with a nationally important breeding population. The EIAR states that a single regularly occurring breeding pair is sufficient for classification at national importance because Ireland's breeding population is so small. [15] It then discounts the site's importance because the birds were not recorded in 2023-2025 and similar habitat occurs elsewhere.

That reasoning is backwards. The disappearance of a breeding pair from a catastrophically declining national population is not evidence that the habitat has become expendable. It is a warning that recovery space must be retained. The applicant itself recognises that the historic nesting area could be disturbed if Curlew return. In a Nature Restoration context, the relevant question is not simply whether Curlew were present on the last survey date, but whether the site can contribute to recovery.

The EIAR also records active Kestrel use: confirmed or probable breeding territories, prey-passing, juveniles and regular hunting within or partly within the site. [15] Kestrel is Red-listed in Ireland. Assigning only local importance to a Red-listed species that is actually breeding and hunting within the project area understates the conservation significance of the record. This is not a transient bird passing at height; it is evidence that the site functions as breeding and foraging habitat for a species whose Irish population is in serious decline. [21]

The same concern arises with Meadow Pipit. The EIAR's lower/local valuation conveys an unjustified impression of security. BirdWatch Ireland's current species account records short- and long-term breeding-range declines of approximately 55%, while the Countryside Bird Survey describes the population trend as a moderate decrease. [22] A formerly widespread species can decline quietly because each individual site is dismissed as only locally important. Its continuing relative abundance is not a licence to discount the habitat on which that abundance depends.

More generally, reliance on Bird Atlas 2007-2011 as a principal yardstick for present ecological value is no longer sufficient without being tested against current monitoring and conservation status. The Atlas remains a valuable historical baseline, but its field data are now roughly fifteen to nineteen years old. During that interval Kestrel entered the Red List and several farmland and wetland birds continued to decline. A contemporary assessment must use the latest Countryside Bird Survey, Irish Wetland Bird Survey and Birds of Conservation Concern evidence, not freeze the receiving environment at its 2007-2011 condition. [21]-[23]

The applicant accords county importance to wintering Whooper Swan, Golden Plover and Snipe. Taken with the nationally important Curlew record, breeding Kestrel, declining Meadow Pipit, Buzzard, Sparrowhawk and Lapwing, this is a coherent assemblage associated with open wet ground rather than a collection of isolated observations. Bog, wet grassland, rough grassland, pools, drains and adjoining farmland work together as nesting, roosting and feeding habitat. Fragmented assessment of the substation cannot strip those records of their whole-project significance.

This makes location the decisive issue. The precautionary response to a site capable of supporting nationally important breeding Curlew, county-important wintering waterbirds and Red-listed breeding Kestrel is to retain and restore the habitat, not to install enabling infrastructure and hope the birds can use what remains. Ireland's Curlew recovery effort cannot succeed unless enough suitable breeding landscapes are left available for birds to return to. The fact that Curlew have not been observed here since 2022 strengthens the restoration case; it does not extinguish it. There are other places to put substations and wind-energy infrastructure. There are very few places where a connected bog-and-wet-grassland mosaic can realistically be restored for this suite of declining species. [24]

11. Peat, drainage, karst and water risk

The site contains cutover peat, wet grassland, drains and groundwater pathways in a limestone-karst landscape. The substation, compound, access tracks, cable trenches and end masts require excavation, hardstanding, drainage and long-term maintenance. Even where the final substation footprint is described as improved or wet grassland, the works form part of a hydrologically connected site containing peatland and wet habitats.

Local experience in Knockaunakill includes significant flooding and evidence of cavernous or rapid groundwater movement. Karst systems do not always conform to simple surface catchment assumptions. Changes to drainage, temporary pumping, sediment mobilisation or polluted firewater can travel through pathways that are difficult to predict. The nearby Drumady Lough system and downstream waters support sensitive aquatic ecology, including species protected under EU law. Lough Fark also has exceptional palaeoenvironmental importance because its pollen record reconstructs land use around Mayo Abbey over millennia. [5]

Appendix C contains a photograph taken during flooding in November 2024. My family's organic holding is visible on the right-hand side of the scene. Also on the right is the location of a locally known swallow hole into which a stream running through the proposed-site area drains. The photograph is direct evidence of real flood behaviour in the receiving landscape, not a theoretical line on a model. A swallow hole is both a drainage receptor and a potentially rapid subsurface pathway. If site works increase the speed or volume of runoff, interfere with drains, mobilise sediment, or reduce the capacity of this natural drainage system, water can back up or be displaced onto adjoining farmland. Conversely, any polluted runoff entering the swallow hole may be carried rapidly into the karst groundwater system. The possibility of development-related aggravation of existing flooding therefore required focused, site-specific investigation; it was not adequately addressed as a central issue in the EIAR.

A second photograph in Appendix C records flooding on the eastern Knockaunakill loop walk in January 2026. Floodwater covered the local access route and disrupted access to my home and farm. Viewed with the November 2024 event, this shows recurrent flooding in more than one part of Knockaunakill and demonstrates that drainage constraints already affect ordinary residential and agricultural access. Any proposal involving further hardstanding, road works, cable trenches, culverts or engineered drainage must establish, with evidence, that it will not increase flood depth, duration, frequency or obstruction of access. The EIAR did not make this lived flood behaviour a focus.

The Commission should therefore require a genuinely conservative assessment of combined drainage and water effects from the substation, wind farm and BESS, including construction overlap, cumulative hardstanding, peat/spoil storage, accidental releases and firewater. The absence of a mapped surface-water crossing is not the same as the absence of a groundwater or ecological pathway.

12. Cumulative industrialisation and the BESS proposal

The substation application cannot be considered against a fictional baseline in which no other energy development exists. The area already experiences cumulative pressure from multiple wind farms, overhead transmission infrastructure and the proposed Cunlaghfadda turbines. The Cloonbaul BESS application, Mayo reference 2660653, adds another major industrial energy component in the same locality. [17]

Each individual application may describe its own footprint as limited, but the community experiences the combined result: permanent compounds, security fencing, lighting, masts, tracks, drainage works, habitat fragmentation, construction traffic, noise, fire and emergency-planning concerns, and the progressive conversion of a historic rural landscape into an energy-industrial campus. That cumulative land-use change is the very effect that project-by-project assessment is prone to miss.

The Commission should also be cautious of strategic lock-in. Once a 110kV loop-in substation is authorised and built, its existence will inevitably be advanced as a reason to approve further generation,

storage or grid infrastructure. The decision is therefore not merely about today's fenced compound. It would materially alter the planning baseline and future development pressure at Cloonbaul.

13. Climate obligations do not disapply environmental law

The applicant places heavy reliance on national and EU renewable-energy policy and the overriding public interest in accelerating renewables. Those policies are important, but they do not erase the EIA Directive, Habitats Directive, Birds Directive, archaeological protection, the precautionary principle or the Nature Restoration Regulation. Renewable energy must be delivered in suitable locations and designed to avoid unnecessary environmental damage.

The Supreme Court's Coolglass judgment, [2026] IESC 5, requires proper engagement with statutory climate obligations; it does not create an automatic entitlement to permission or supersede mandatory EU environmental protections. [19] Nor does it make alternatives irrelevant. Indeed, the Nature Restoration Regulation expressly recognises the need to address climate change and biodiversity loss together. The lawful response is good spatial planning: renewable and grid infrastructure where it can be accommodated, and restoration where land has exceptional recovery potential.

There is a sharp irony in presenting this development as environmentally necessary while selecting land that supports a protected butterfly, Annex I grassland, recovering peatland and nationally important bird habitat. Ireland cannot meet one environmental obligation by casually spending the natural capital required to meet another.

14. Key deficiencies requiring refusal

Taken together, the following deficiencies are material and cannot safely be left to post-consent conditions:

- Failure to engage with the 1995 Mayo Abbey Archaeological Survey and its assessment of MA101-106.
- Failure to establish the nature and significance of the enclosure and associated subsurface archaeology before consent.
- Failure to assess the apparent banks, stone alignments and possible field-system features in adjoining Knockaunakill as part of the wider archaeological landscape.
- Reliance on construction-stage test trenching, monitoring and possible preservation by record rather than prior non-destructive investigation and preservation in situ.
- An alternatives assessment that acknowledges greater archaeological and permanent landscape risk in the selected private-land/110kV option but prioritises a shorter route.
- Fragmented consenting of the wind farm, grid connection and BESS despite their functional and cumulative relationship.

- Insufficient engagement with the current legal and policy implications of Regulation (EU) 2024/1991 and Ireland's National Restoration Plan process.
- Over-reliance on narrow buffers, pre-construction surveys, translocation and developer-managed enhancement for a dynamic Marsh Fritillary population.
- Failure to treat the former Curlew breeding territory as recovery habitat in the context of catastrophic national decline.
- Failure to map and investigate the locally observed swallow hole, the stream draining the proposed-site area and documented November 2024 and January 2026 flooding, including disruption of access to a home and organic farm.
- Insufficiently precautionary treatment of cumulative peat, drainage, karst, water, fire and industrialisation effects.

15. Requested decision and further steps

I respectfully ask the Commission to:

1. refuse approval for the proposed 110kV substation, loop-in connection and associated works under case VA16.324429;
2. in the alternative, decline to grant approval until the connected wind-farm appeal and the BESS application have been finally determined and a coherent whole-project assessment is possible;
3. require the applicant to address FIE's project-splitting submission and demonstrate how the Commission can lawfully make a whole-project decision notwithstanding the separate consent routes;
4. require independent archaeological review of MA101-106, the 1995 survey, the recorded Knockaunakill field system and the wider Mayo Abbey landscape, followed by field inspection, LiDAR analysis and appropriate non-invasive geophysical survey before any consent decision;
5. seek a focused submission from the National Monuments Service on preservation in situ and the adequacy of the applicant's archaeological baseline;
6. require a site-specific karst hydrogeological and flood-risk investigation addressing the locally observed swallow hole, stream connectivity, the November 2024 and January 2026 flood extents, obstruction of residential/agricultural access, groundwater pathways and the combined drainage effects of the substation, wind farm and BESS;
7. require an explicit assessment of the site's nature-restoration potential under Regulation (EU) 2024/1991, including pollinator, grassland, peatland and Curlew-recovery objectives; and
8. apply the precautionary principle where survey gaps, ecological variability or uncertain groundwater pathways remain.

Conclusion

Cloonbaul and the wider Mayo Abbey landscape have already yielded evidence spanning thousands of years. The substation site is not blank land awaiting a useful purpose. It already has one: it holds archaeological memory, supports a living habitat mosaic and offers a credible opportunity for restoration at the very moment Ireland is legally required to identify and recover such places.

The applicant asks the Commission to accept irreversible construction now and to trust that archaeology can be recorded, butterflies can be moved, habitat can be recreated, drainage can be controlled and the wider project can be sorted out across separate files. That is too much uncertainty, deferred mitigation and environmental risk for a site of this sensitivity. Once the enclosure is excavated, the peat is drained, the grassland is fragmented and the industrial baseline is established, the loss cannot be undone by a monitoring report.

Ireland needs renewable energy infrastructure. It also needs planning authorities willing to say that some places are too important, too complex and too full of future value to sacrifice for the convenience of a shorter cable run. This is such a place. I respectfully request refusal.

Yours faithfully,

Dr Phelim Ryan

References

- [1] An Coimisiún Pleanála, Case VA16.324429, case details and applicant documentation: <https://www.pleanala.ie/en-ie/case/324429>
- [2] Cunlaghfadda Green Energy Project EIAR, Chapter 3 (Consideration of Reasonable Alternatives) and Chapter 6 (Biodiversity), applicant documents lodged in VA16.324429, 2026.
- [3] Cunlaghfadda Green Energy Project EIAR, Chapter 14 (Archaeological, Architectural and Cultural Heritage), applicant documents lodged in VA16.324429, 2026.
- [4] Kevin Barton, submission on the Cunlaghfadda Wind Farm cultural-heritage assessment, 22 June 2026; citing E. Cotter, Mayo-Galway Pipeline, Kilbride 1, Excavation Licence 05E0833, final report to Bord Gais Eireann (2008).
- [5] J. L. Fuller, 'Past Vegetation and Land-Use Dynamics in Mayo Abbey, Central Mayo' (2002).
- [6] Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration, OJ L 2024/1991, 29 July 2024: <https://eur-lex.europa.eu/eli/reg/2024/1991/oj>
- [7] Commission Implementing Regulation (EU) 2025/912 of 19 May 2025 laying down the uniform format for national restoration plans: https://eur-lex.europa.eu/eli/reg_impl/2025/912/oj
- [8] Commission Delegated Regulation (EU) 2025/2188 of 19 September 2025 on the science-based method for monitoring pollinator diversity and populations: https://eur-lex.europa.eu/eli/reg_del/2025/2188/oj
- [9] Department of Housing, Local Government and Heritage, First public consultation on Ireland's draft National Nature Restoration Plan, 3 June 2026: <https://www.gov.ie/en/department-of-housing-local-government-and-heritage/consultations/first-public-consultation-on-irelands-draft-national-nature-restoration-plan/>
- [10] Friends of the Irish Environment, submission/press statement, 'Environmental Charity Says Splitting Mayo Windfarm From Substation Salami Slicing', 8 August 2026: <https://www.friendsoftheirishenvironment.org/press-releases/environmental-charity-says-splitting-mayo-windfarm-from-substation-salami-slicing>
- [11] European Commission, Commission Notice regarding application of the Environmental Impact Assessment Directive, OJ C 486, 3 December 2021: [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021XC1203\(01\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021XC1203(01))
- [12] Case C-142/07, Ecologistas en Accion-CODA v Ayuntamiento de Madrid, EU:C:2008:445.
- [13] Case C-205/08, Umweltanwalt von Kamten v Kamtner Landesregierung, EU:C:2009:767.
- [14] Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (Habitats Directive), including Annex II listing for Euphydryas aurinia.
- [15] Cunlaghfadda Green Energy Project EIAR, Chapter 7 (Birds), including Curlew and Kestrel survey results, applicant documents lodged in VA16.324429, 2026.
- [16] Mayo County Council planning reference 2660398, Cunlaghfadda Wind Farm: decision to refuse permission, 14 July 2026, and subsequent appeal.
- [17] Mayo County Council planning reference 2660653, proposed Cloonbaul Battery Energy Storage System and associated 33kV infrastructure, 2026.
- [18] Mayo Abbey Archaeological Survey (1995), record concerning MA101-106 and the wider Mayo Abbey archaeological landscape; cited in local submissions on VA16.324429 and planning reference 2660653.
- [19] Coolglass Wind Farm Ltd v An Bord Pleanála & Ors [2026] IESC 5.
- [20] Dr Phelim Ryan, observation/objection on Mayo County Council planning reference 2660398 (June 2026); Mary Ryan, submission on planning reference 2660653 (23 August 2026).

- [21] Gilbert, G., Stanbury, A. and Lewis, L. (2021), 'Birds of Conservation Concern in Ireland 4: 2020-2026', Irish Birds 43, including the Red-list classification of Kestrel; BirdWatch Ireland, Birds of Conservation Concern in Ireland: <https://birdwatchireland.ie/publications/birds-of-conservation-concern-in-ireland-bocci4-2020-2026/>
- [22] BirdWatch Ireland, 'Meadow Pipit', current species account and Countryside Bird Survey trend information: <https://birdwatchireland.ie/birds/meadow-pipit/>; Countryside Bird Survey trend portal: <https://c0cre470.caspio.com/dp/4bae3000b11f2454575141d6884b>
- [23] Balmer, D.E. et al. (2013), Bird Atlas 2007-11: The Breeding and Wintering Birds of Britain and Ireland; compared with current BirdWatch Ireland Countryside Bird Survey and Birds of Conservation Concern assessments.
- [24] National Parks and Wildlife Service, Ballygar (Aghrane) Bog SAC (site code 002199), Conservation Objectives Supporting Document - Raised Bog Habitats (2023), recording Curlew nesting on bog and dependence on neighbouring wet grassland for feeding.
- [25] Office of Public Works, Heritage Ireland, 'Dorus Wedge Tomb' and 'Altar Wedge Tomb', describing wedge tombs as Neolithic funerary monuments and the youngest class of Irish Stone Age megalithic tomb: <https://heritageireland.ie/unguided-sites/dorus-wedge-tomb/>; <https://heritageireland.ie/unguided-sites/altar-wedge-tomb/>

Appendix A - Community mapping of Devil's-bit Scabious

The following material records a community ground-truthing exercise undertaken by Dr Phelim Ryan and Olivia Galvin. It is submitted as photographic and indicative location evidence, not as a substitute for a professional botanical survey. Its purpose is to identify an apparent gap requiring independent ecological verification.

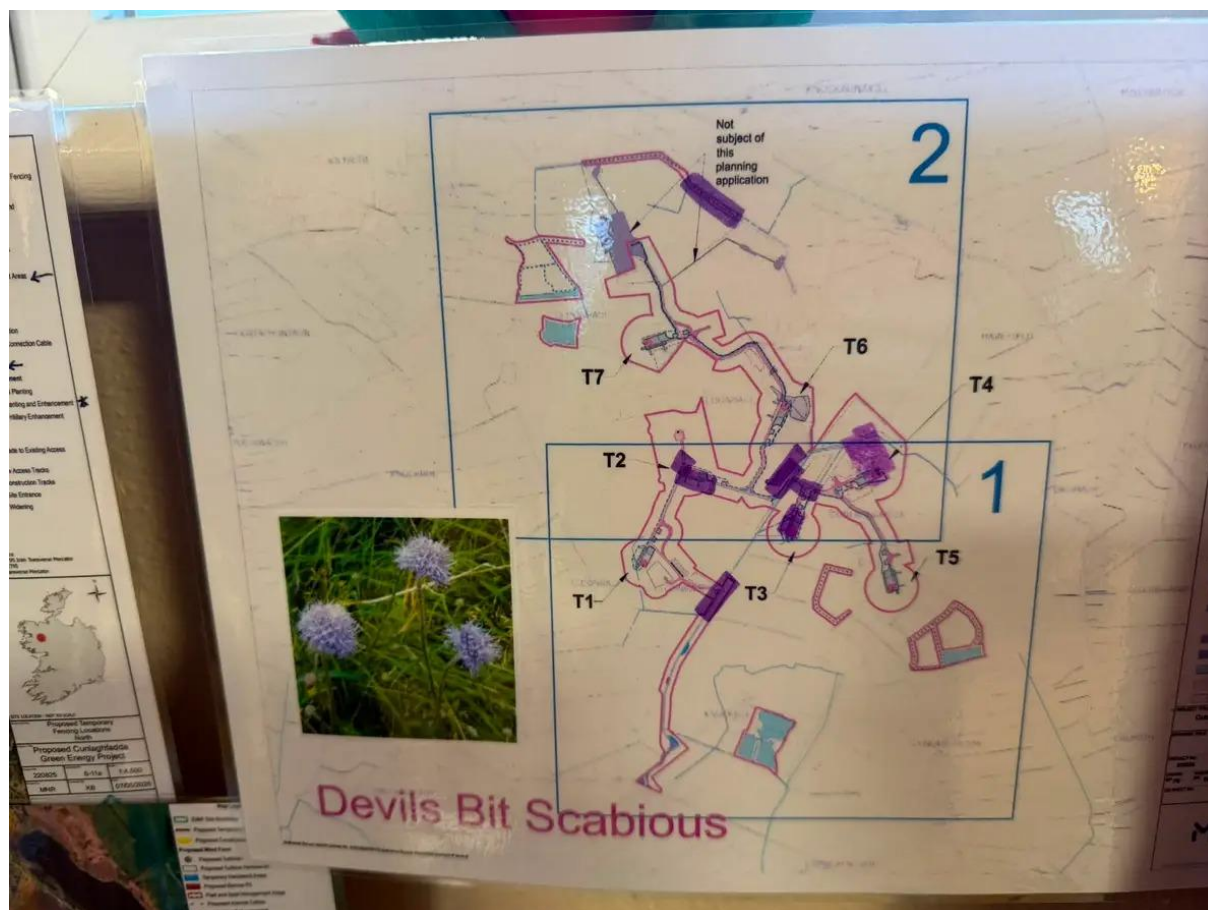


Figure A1. Community mapping overview of Devil's-bit Scabious occurrences across the wider Cunlaghfadda project area. Purple annotations indicate locations recorded during the community exercise. The underlying plan is used for orientation only.

Appendix A - Field photograph and indicative infrastructure



Figure A2. Devil's-bit Scabious visible in the foreground during community ground-truthing. The orange X indicates the general direction/location of the proposed BESS and substation; the orange line indicates the approximate grid-connection alignment. Annotations are indicative and not a surveyed engineering overlay. The photograph nevertheless demonstrates potentially relevant foodplant habitat close to the proposed energy-infrastructure corridor.

Appendix B - Apparent earthworks and field-system features, Knockaunakill

These photographs were taken in the adjoining townland of Knockaunakill on 24 May 2026. They are submitted as landscape evidence requiring professional archaeological assessment. No archaeological date or interpretation is asserted from the photographs alone. Read alongside the field system already recorded in the applicant's Chapter 14 and MA101-106, they demonstrate why the receiving environment must be examined as a connected archaeological landscape rather than only within individual development footprints.



Figure B1. Knockaunakill landscape overview showing repeated low stone alignments, banks and apparent compartments extending through pasture. Their date and function require archaeological assessment.

Appendix B - Detail views of possible field-system features



Figure B2. Upright and partly embedded stones with low relief continuing through the pasture. The arrangement may represent a relict boundary or structural feature, but requires expert inspection.

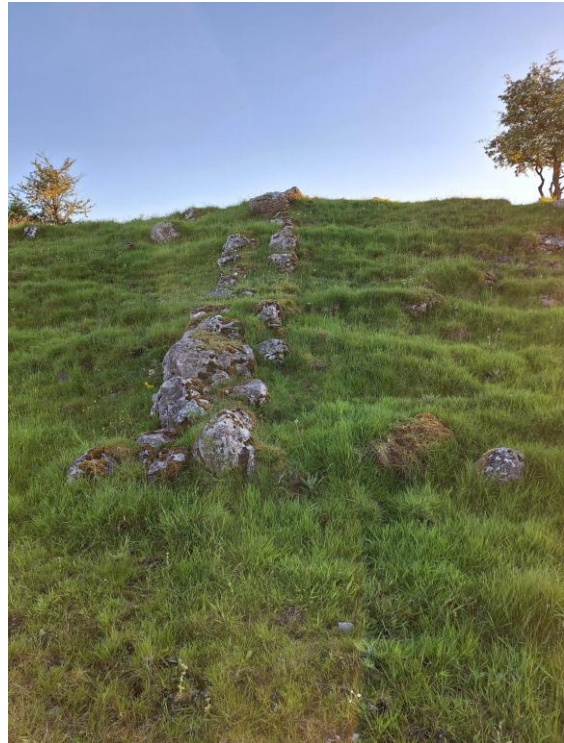


Figure B3. Linear stone alignment ascending the slope, with associated banks and terraces visible in the surrounding ground. The feature's extent, date and relationship to the recorded Knockaunakill field system remain untested.

Appendix B - Additional prospective features in Knockaunakill



Figure B4. Wider Knockaunakill view showing subtle circular or curvilinear organisation in the pasture and possible low boundary lines. The photograph is not diagnostic of date or function, but the spatial pattern is prospective and should be compared with LiDAR, historic imagery and the recorded field system.



Figure B5. Detail of stones and low grass-covered banks forming an apparent curvilinear arrangement. Such features may be natural or agricultural, but in this archaeological setting they warrant professional recording and assessment as possible evidence of early settlement organisation or linked field boundaries.

Appendix C - November 2024 flooding and karst drainage

This photograph was taken in November 2024 during a local flood event. The Ryan family's organic farmland is visible on the right. The right-hand side of the scene also contains the location of a locally known swallow hole receiving a stream that runs through the proposed-site area. The image is submitted as local factual evidence of flood susceptibility and a surface-water/karst connection requiring professional investigation.



Figure C1. Flooding photographed in November 2024. The organic holding is visible to the right. The locally known swallow-hole location is on the right-hand side and receives a stream running through the proposed-site area. The photograph demonstrates existing flood behaviour and the need to assess runoff, backwater effects, sediment blockage and rapid karst-groundwater conveyance before development is authorised.

Appendix C - January 2026 flooding of eastern Knockaunakill access

This photograph records floodwater covering the eastern section of the Knockaunakill loop walk in January 2026. The flooding disrupted access to Dr Ryan's home and farm. It is submitted as evidence of recurring local flooding affecting both movement and agricultural activity, and should be considered together with Figure C1.



Figure C2. Flooding across the eastern Knockaunakill loop-walk access in January 2026. The event disrupted access to a home and farm and demonstrates an existing vulnerability that must be incorporated into baseline flood-risk and cumulative drainage assessment.