

Submission to An Coimisiún Pleanála

A Formal Objection to Planning Application Ref. 324429

RE: Proposed Development which consists of a 110kV onsite electrical substation, loop-in grid connection, and associated infrastructure and works (in the townland of Cloonbaul, County Mayo).

Submitted by: Cyril Reid, Knockaunakill, Mayo Abbey, Claremorris, Co. Mayo F12F7X8

My grandparents lived and raised their family in Knockaunakill. I have a connection to this townland, and indeed the parish, my entire life. My love for this area lead myself and my wife to purchase a house in Knockaunakill nearly 15 years ago and we have enjoyed the quiet, scenic beauty of this area ever since.

As the owners of a property (H006, as used in the EIAR) that is one of the closest houses to a turbine we will be greatly affected by this entire development, our curtilage is 155 meters from the site boundary of this application.

When reviewing the documents that have been submitted by the applicant it is difficult to view what is included in this application without taking the whole development into account

It is unfair that, currently, we have to deal with 3 separate planning applications for what constitutes a single site development.

To quote the Friends of the Irish Environment press release on the application (<https://www.friendsoftheirishenvironment.org/press-releases/environmental-charity-says-splitting-mayo-windfarm-from-substation-salami-slicing>)

“this is unlawful "project splitting" or "salami-slicing". The charity's submission cites a consistent line of Irish High Court rulings — O’Grianna v An Bord Pleanála (2014), Sweetman v An Bord Pleanála (2023) and, most recently, North Westmeath Turbine Action Group & Sweetman v An Bord Pleanála (2025) — all holding that a windfarm and its grid connection form a single project under EU environmental law and must be assessed together, not as two unrelated applications before two different bodies.”.

Indeed, under European environmental and planning law, competent authorities are explicitly required to consider cumulative effects (‘cumulation of projects’) and the applicant appears to be intentionally breaking the entire project into separate applications prevents this.

The press release above was dated the 8th of August, and since then a third application has been submitted to Mayo County Council, Planning Application: 2660653, for a BESS facility (Battery Energy Storage System) on the same site. Indeed in their application its noted as “a co-located energy storage development”, i.e. co-located, sharing a single location.

The residents of this area feel like decisions have been made by the applicant to make it as difficult as possible for us to express our concerns over this application.

The compound for this substation is over 12,000m². It is noteworthy that the compound for the 110kV electrical substation for the Ballivor Wind Farm Development measures roughly 15,400 square metres, and houses critical grid infrastructure to export power from the 26 wind turbines. What does the size of the substation imply for the residents in the vicinity of this development? That the number of turbines will increase year by year?

It is also noteworthy that there was a meeting about this development between ACP and representatives of Cunlaghfadda Green Energy Ltd, case 319153 (Proposed development of 110kV grid connection to facilitate the connection of a proposed Wind Farm to the national grid at Cunlaghfadda and adjacent town lands, Co. Mayo).

In the records of this meeting (Records (319/P319153.pdf, .PDF format 176KB) representatives of Cunlaghfadda Green Energy Ltd. are recorded as say "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." As one of the closed houses to this proposed application I can say that the first any resident that I have talked to heard about this project was March 2026. They go on the state: "In Q2 of 2024, the prospective applicant, issue a letter to residents within 2 kilometres of the proposed site outlining the nature of the proposed development...." this did not occur, "In Q3 2024, a public exhibition event will be held in the local community hall" this did not occur, "the prospective applicant has organised a tour of an operational wind farm", this did not occur.

To emphasise that the residents do not appear to been considered or afforded any say in these developments, MKO state in 1.2 of the EIAR 'Importantly, renewable energy developments, including related grid and storage infrastructure, are now presumed to be in the **overriding public interest**.' The bold and underline formatting in that quote is not my editing, it's what is in their document, but presumed by whom?

From what can be learnt by talking to residents in this area, it most defiantly is not presumed by the public, we feel like we are being run roughshod over, and all that seems to matter is another windfarm is constructed regardless of local, environments, historic landscape, heritage concerns.

This is one cumulative energy complex, it should be treated as such, and there should be proper consultation with all individuals concerned. The only face to face consultation that has occurred was on a single date in early April of this year, residents were asked to make appointments to attend, a max of 4 per meeting. Regardless of what the applicant may claim, not all residents were afforded this opportunity either, I discussed this meeting with a neighbour and they did not receive an invite so I invited him to come along to our meeting, this resident is situated 940 meters from turbine T7 so within the 1km.

Heritage

I have spend many years involved in the heritage of this area, and have been a member of the Mayo Abbey Heritage Committee. The heritage of Mayo Abbey is a fascinating area of study, and research indicates that area was first farmed between 1000-650 BC (Fuller, 2002). Archaeological investigations of various sites have shown evidence of human habitation in this area for nearly 5000 years.

The village of Mayo Abbey was not always known by that name, but instead only as Mayo, the addition of the Abbey is of later origin. In Irish 'Maigh Eo na Sacsan', which translates to Mayo of the Saxons (English), is a historic location. The Abbey was founded circa 670 by St. Colman of Lindisfarne after he left the isle of Iona off the west coast of Scotland. Within 60 years it was known of and written about by the Venerable Bede of Jarrow in his "Ecclesiastical History of the English people". The chief advisor to the Roman Emperor Charlemagne wrote at least two letters of support and praise to Mayo of the Saxons (c780). Nobility of the High Kings of Ireland, the O'Connors, are buried in its grounds. Aldfrith, King of Northumbria visited after the untimely death of his son, who was a student there. The Book of Ballymote, states that at the start of the eighth century, at least one hundred Saxon monks were present.

The extent of the monastic settlement covered over 11 hectares, with the monks also receiving grants of land which eventually amounted to more than 810 hectares. The settlement itself is now under the protection of the Office of Public Works.

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 village 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.

There are also ongoing community preservation efforts, with remote sensing projects (LiDAR) continually uncovering new details about the settlement's medieval layout. The heritage of this area is still to be fully realised, and we cannot afford to destroy that.

In addition to the OPW protecting the village of Mayo Abbey, we know that there are many recorded monuments across the wider locality, but there are also the unrecorded monuments!

There was an excavation in Cloonbaul/Kilbride (excavation Licence number: 05E0833) in July 2005 that shows there are structures in the area dating as far back as 2470BC: 'radiocarbon dates span the period 3010–2470 cal BC. On that basis, the site is interpreted as a Late Neolithic timber circle.' Cloonbaul is one of the townlands affected by this planning application. The coordinates for this Late Neolithic timber circle puts it at approx. 790m from turbine T7, but only 550m from the proposed substation.

Of even more concern is another enclosure also in Cloonbaul townland that is currently not showing on the Historic Monument Viewer. One of my neighbours queried the National Monuments Service (NMS) on this omission and received a response Jun 8, 2026: 'We know about this enclosure in Cloonbaul townland, near Mayo Abbey. It has already been recorded but due to technical/IT issues is not showing up on the Historic Monument Viewer.' From the latest information we have received this monument is classified as an enclosure and has the ref number MA101-106. Between May 1995 and June 1996 there was an archaeological survey carried out on the Parish of Mayo Abbey, this monument was recorded there by the archaeology team, this monument was listed as Site no. 99 (O.S. 101) – Cloonbaul. As there is little available online information for this monument I am including a screen grab of its entry in "An Archaeological Survey Of The Mayo Abbey Parish (1995 – 1996)"

Mayo Abbey Archaeological Survey

Townland:	CLOONBAUL	6 inch Sheet:	101:1:2
Parish:	MAYO ABBEY	Site No:	99
Barony:	CLANMORRIS	Altitude:	200-300
Type:	ENCLOSURE + FIELD SYSTEM	Date:	04/03/96
Class:	UNCERTAIN	Co-ords:	144-586
Period:		Status:	
Condition:	FAIR	Owner:	TOM & PADDY KILLEEN, CLOONBAUL

Mayo Abbey Archaeological

Site no. 99 (O.S. 101) - Cloonbaul

SITING

This site lies along the eastern edge of an uneven field of thistle covered grazing. Set on a slightly raised drumlin there is a fair commanding view to the E and W but slightly higher ground to the NNW and S overlooks the site. There is a small mound on the higher ground to NNW which appears to be of some antiquity (Cloonbaul 99, 101). The breen which runs by the eastern sector of the site has possibly damaged some of its associated banks.

DESCRIPTION

This site appears to consist of a fairly large univallate oval shaped enclosure bordered mainly by a bank of earth with some large limestone blocks evidently used as facing on the outside, at intervals (mainly along SW sector). The enclosing bank is scarped along the southern half where it varies from 1.20 m along W and S and reaches 1.45 m high along E. Overall diameters of the enclosure measure 37 m NNW-SSE by 22 m E-W while across the top it measures 33 m by 18 m E-W. The northern half of this enclosure appears to have been modified to accommodate a ringfort or some such enclosure. The enclosing bank of this has been built on the line of the earlier enclosure, apart from along the S. Crest to crest diameters of this ringfort measure 18 m NNW-SSE by 16 m E-W. Its enclosing bank which is composed of a mixture of earth, gravel and larger stones is best preserved along the S where it averages 2.10 m wide overall, 1 m high externally and 1.4 m high internally; elsewhere this bank is much lower internally reaching only 55 cm high in a few spots (notably NNW, ENE and SW). Some large limestone facing stones are used on this bank along the S sector. The only clear possible entrance lies in the SE sector of the smaller enclosure and measures roughly 6 m wide overall. Either side of this possible entrance feature is lined with a bank of earth and stone. This bank averages 1 m to 1.3 m high; while the bank on the southern side of this "entrance" runs straight, that on the northern side is more kinked. These banks meet up with a more recent breen 10 m away and they may originally have extended much further. The field across the breen to the E has been partly cleared recently, yet still some similar type banks survive. A further series of similar banks lie outside the S and W sector of the site and they would appear to have been contemporary with the main site. There are also a number of lazy beds mixed through these ancient field systems. Just outside the northern sector of the site is a small area of quarrying; mainly two quarried trenches. Some stones dug out of these lie scattered on the ground - one upright limestone boulder appears today as a possible standing stone, but this is most unlikely. Anyway, for the record it is 1.5 m high at most, 1.35 m wide and 55 cm thick.

Site interior appears to be generally flat and featureless in the S half; the N half contains a few moss covered clumps of stones, some of which appear to mark internal features or graves. There is evidence for a berm outside the enclosing bank of the fort along the SE and SW sectors; this berm averages 4 m wide and stands 55 cm high at most.

OBSERVATIONS AND RECOMMENDATIONS

■ In the northern sector the bank of the enclosure has been partly damaged by some fairly recent interference, apparently. Though not marked on any earlier maps, this site would appear to be of immense archaeological significance because of the large area it occupies.

Mayo Abbey Archaeological Survey

There is a fair amount of local folklore associated with this site - while called a fairy fort, there are stories of horses hunting through this area at night; also stories of the old orchard been under the spell of the fairies.

Some aerial photographs of this site and its associations could be helpful.

ORDNANCE SURVEY DESIGNATIONS

OS 1838 N↑

Not marked

OS 1916 N↑

Not marked

1838 Name
Not named

1916 Name
Not named

DRAWING

Due to the scan not being the best quality I will repeat the Observations and Recommendations section for this monument.

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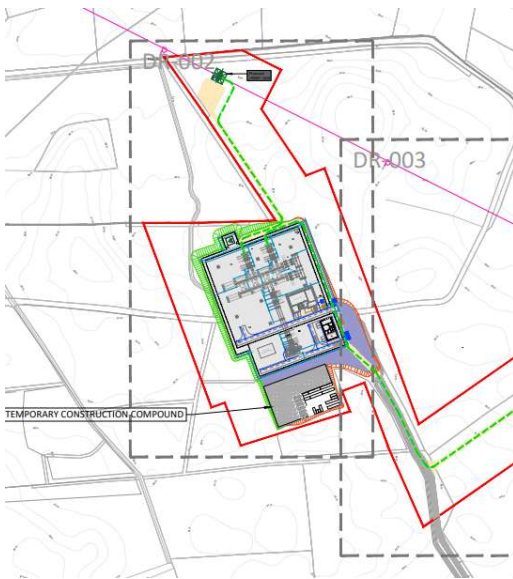
Some aerial photographs of this site and its associations could be helpful."

This monument, ref number MA101-106, and the excavated site in Kilbride, excavation Licence number: 05E0833, show that there is significant archaeological discoveries being made and still to be discovered in this historic area of the county.

The applicant's archaeological chapter lists a stone axehead, two polished stone axeheads and a whetstone recovered in Cloonbaul. These artefacts and the monuments mentioned above demonstrate prehistoric activity and reinforce the need to treat the proposed site and cable corridor as archaeologically sensitive.

To position monument, ref number MA101-106, below are two screen grab, the left shows the substation, the right its approx location on google earth (no setting out information was provided on the site boundary, again this complicates things for anyone wishing to make an observation). The blue arrow shows the location of the monument, co-ordinates are included in the extracts above to allow confirmation. I have discussed this monument with neighbours, and I am aware

that others will be submitting an observation based on this, including the supervisor of the project that produced “An Archaeological Survey Of The Mayo Abbey Parish”.



Archaeological uncertainty is a reason for investigation and protection, not permission followed by excavation. Desk study, aerial photographs and a walkover cannot reliably establish the character of a low-profile or buried enclosure. Modern LiDAR, magnetic gradiometry and ground-penetrating radar can identify features that are invisible at ground level and can guide any carefully targeted testing.

The public and the Commission must know what survives before deciding whether permanent electrical infrastructure is acceptable, and a permanent substation should not be placed where important archaeology must be excavated to accommodate it

A promise to investigate after permission reverses the proper sequence and risks making the engineering layout more important than the archaeology.

The Irish State guarantees in its laws to respect and, as far as practicable by its laws, to defend and vindicate the personal rights of the citizen, its laws does not allow for **‘overriding public interest.’**

An Coimisiún Pleanála is urged to apply Precautionary Principle and refuse planning permission based on the grounds mentioned above and specifically to ensure that enclosure, ref number MA101-106, should be preserved and the application refused.

I respectfully request that An Coimisiún Pleanála refuse planning permission for the proposed Cunlaghfadda Green Energy Ltd Substation.

Yours faithfully

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