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1st September 2026

An Coimisiún Pleanála
64 Marlborough Street,
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VIA ONLINE PORTAL

**SUBMISSION ON A STRATEGIC INFRASTRUCTURE DEVELOPMENT PLANNING APPLICATION – CASE
NUMBER VA16.324429 - Cunlaghfadda Wind Farm Project – 110kV sub-station**

I object to this application on the basis of the proposed wind farm and this associated 110kV sub-station structure are unwanted intrusions into a sensitive historical and archaeological landscape that is irreplaceable. Further, the health, wellbeing and visual amenity for residents, visitors and tourists will be severely impacted by the location and scale of the development.

Mayo County Council (MCC) has REFUSED to grant permission for the wind farm element of this project and therefore any proposed associated structures such as an 110kV sub-station will not be required. The considered opinion of MCC carries considerable weight given it is based on planning regulations and considerable local opposition to the project as expressed in the many local submissions on the planning application.

The key points in my submission on the wind farm are repeated below, they are very relevant to the proposed development of a 110kV sub-station and in particular to the archaeological assessment presented.

1. Key topographic/elevation information submitted by the proposer and their agents is deficient in specification, analysis and discussion such that the visual impact of the development cannot be fully assessed.
2. One important archaeological recommendation from the scoping request to the Development Applications Unit (DAU) is not addressed in this proposal.
3. Drawing circular zones of potential impacts around the proposed development is a misguided and blinkered approach when considering the detrimental impacts on the Mayo Abbey historic and archaeological landscape that extends far beyond the limit of the meaningless circles. These zones do not define anything in relation to history and archaeology.
4. Over-reliance on a standardized desktop approach to the archaeological assessment, without consultation to key published research and excavation findings, has resulted in a passive selectivity in relation to discussion on the impacts, archaeological potential and detrimental impacts of the proposed development.

In relation to the MCC response to the archaeological assessment presented by the developer for this application, I wish An Coimisiún Pleanála (ACP) to note certain statements in the MCC Archaeologist's and Planners presented below -

Archaeologist's Report

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. As this site has been so designated the impacts of the proposed development in this area needs to be re-assessed and appropriate mitigation measures approved by the National Monuments Service and the Local Authority.

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 monuments in the Mayo Abbey area. Any potential impact of the proposed development on this mound must also be assessed and appropriate mitigation measures approved by the National Monuments Service and the Local Authority

Planner's Report

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. As this site has been so designated the impacts of the proposed development in this area needs to be re-assessed and appropriate mitigation measures approved by the National Monuments Service and the Local Authority – Internal report received on Gerry Walsh Senior Archaeologist.

It is considered that the assessment in Chapter 14 of the EIAR significantly understates the likely real significant impact of the proposed development on the cultural heritage of the area, but that this could be addressed by way of attaching appropriate conditions in the event of a grant of permission.

The planner's statement in bold above plainly points out the extremely worrying deficiency in the assessment and discussion of the largely undisturbed archaeological and historical landscape into which this very unwelcome wind farm and associated structures is being 'shoe-horned'. My key point No 4 above points out the convenient methodology used in deflecting and minimising the cultural heritage of the area.

Reason 2 in the MCC refusal of permission is reproduced below

"Reason 2 It is considered that the proposed development sited at this location would constitute a highly obtrusive development that would detract from the existing cultural heritage of the area, and would undermine the setting of Mayo Abbey Cemetery and Church ruins, a very important early Christian ecclesiastical site, would erode the local landscape and visual quality of the public open views in the vicinity and would adversely impact on the unique rural character of the immediate local area. The proposed wind turbines would therefore constitute excessively dominant features and a visually obtrusive form of development in this rural landscape and would seriously injure the landscape which it is necessary to preserve and injure the visual amenities of the area. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area."

Further, it is now apparent that LiDAR data were used as part of the landscape assessment in a minimal approach that used 2 dimensional images to look for shapes that may relate to archaeology. This approach neglects to use the interpretational power of LIDAR data to produce and highlight potential archaeological anomalies in 3 dimensional visualisations of the digital terrain model created. This failure to fully investigate the archaeological context of the area of the proposed sub-station resulted in CH10 (MA101-106----) being minimised with the description 'cattle pens'. The location of this site relative to the proposed turbine 7 and the 110kV sub-station is depicted in Figure 1 below.

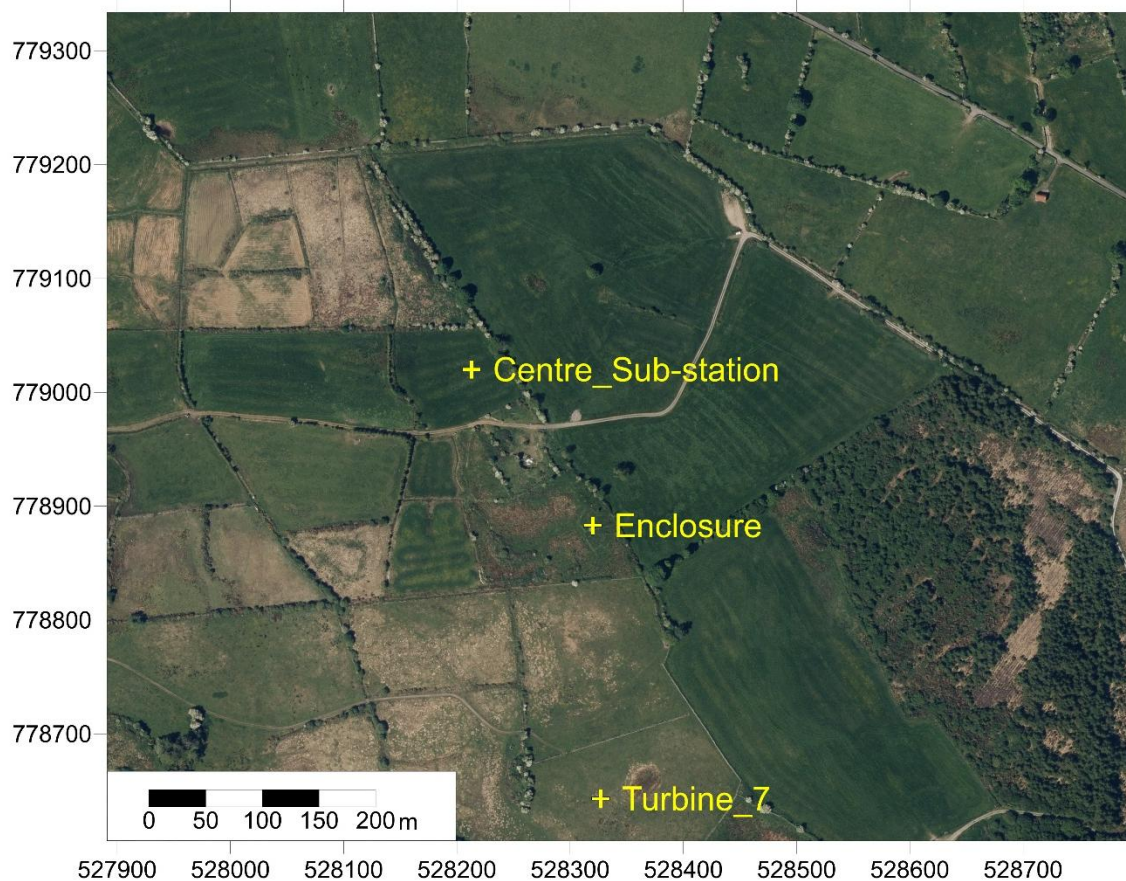


Figure 1 : Cloonbaul Townland, Co Mayo – Area of the proposed sub-station, location of recorded monument (Enclosure MA101-106----) and turbine 7. (Aerial photo: copyright Bluesky International)

The Enclosure lies some 170m southeast of the area of the sub-station. As given in point 5 above in the Archaeologist's Report, the enclosure and a mound were discovered in a 1995/96 archaeological survey of Mayo Abbey Parish. The unpublished report of the survey was and is available in the Mayo Abbey Resource Centre (MARC). The developers, as part of their community consultation failed to contact the MARC and consult the large collection of archaeological and historical papers, maps, reports available on request. For the record the reports for the enclosure and mound are attached as Appendix 1.

The detailed report on the enclosure and to a lesser extent, the mound, indicates the site may be part of a larger complex that includes a field system with banks. The dating of the enclosure is indeterminate, it may be medieval or earlier. The mound may be much earlier (Bronze Age) as indicated by the description of ring-barrow. There are a number of smaller (c. 5m diameter) low topographic profile mounds in the vicinity that could be Bronze Age cooking sites. The Observations and Recommendations accompanying the report on the enclosure state "Though not marked on

earlier maps, this site would appear to be of immense archaeological significance because of the large area it occupies". This statement alone indicates that a large area associated with the enclosure and mound may be prospective for archaeology. The area must be fully investigated by non-invasive, non-destructive geophysical survey. First consideration must be that the whole site must be preserved in-situ. Photo 1 below gives an indication of the scale of the enclosure. The description of 'cattle pens' is difficult to understand.



Photo 1 : Cloonbaul Townland, Co Mayo – Enclosure MA101-106----. View illustrating height of bank estimated to be over 1m above local ground level.

The information on the enclosure presented here demonstrates a failure by the developer to fully archaeologically investigate the area, understand and present the context in which this proposed development may occur. The overall archaeological and cultural heritage reasoning and explanations advanced by MCC in refusing the application should be included in considerations by ACP and this application for a 110kV sub-station must also be refused.

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Appendix 1 – Extracts from the unpublished report on the Archaeological Survey of Mayo Parish.

Site 99 – Enclosure MA101-106----

Site 98 - Mound

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

Author's Surname	Title
Year	Pages

Other Sources	
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Comments	
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Visited by	LEO MORAHAN, PAT MCLOUGHLIN, MARTIN KEAVENEY, MICHEAL ROUGHNEEN
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Write up the site and description information in a separate word processing document and whatever name you give it insert in box below.

Site and Description Reference	ARCH99A
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Mayo Abbey Archaeological Survey

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 boreen 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 boreen 10 m away and they may originally have extended much further. The field across the boreen 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.

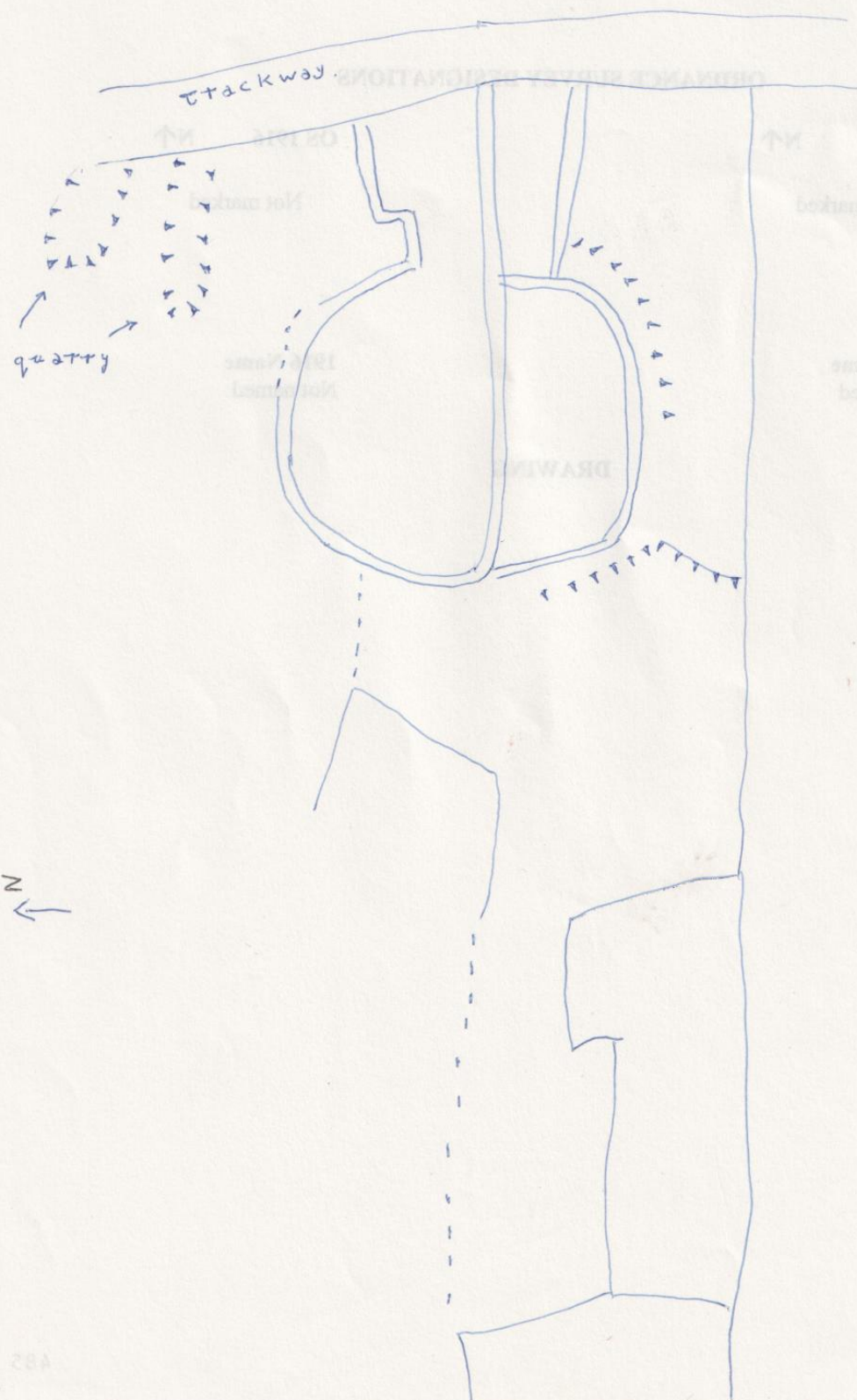
OBSERVATIONS AND RECOMMENDATIONS

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

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

DRAWING



Mayo Abbey Archaeological Survey

Townland:	CLOONBAUL	6 inch Sheet:	101:1:2
Parish:	MAYO ABBEY	Site No:	98
Barony:	CLANMORRIS	Altitude:	200-300
Type:	MOUND	Date:	01/03/96
Class:	UNCERTAIN	Co-ords:	140-590
Period:		Status:	
Condition:	GOOD	Owner:	JOHN FRAN MORAN, CLOONBAUL

Author's Surname

Title

Year

Pages

Other Sources

Comments

Visited by

LEO MORAHAN, PAT MCLOUGHLIN, DAMIEN BARRETT

Write up the site and description information in a separate word processing document and whatever name you give it insert in box below.

Site and Description Reference

ARCH98B

479

Mayo Abbey Archaeological Survey

Site no. 98 (O.S. 101) - Cloonbaul

SITING

This site lies on the top of a low yet pronounced drumlin with an excellent commanding view. It is situated in a small walled garden of rough grazing on the western side of an old disused boreen. Between this boreen and the site are a line of mainly sycamore trees and a small orchard. In this adjacent field to the SSE are a series of earthworks, together with an oval and a roughly circular enclosure (Cloonbaul 99, 101). The ruined house close to its NE edge belonged to a family of Godwins (who lived in Knockaunakill).

DESCRIPTION

This site consists of a small roughly circular low mound of earth and stone of uncertain date and function. The overall diameters measure 6.3 m N-S by 7.6 m E-W while across the top it reads 4.3 m N-S by 5.2 m E-W. It stands on average between 50 cm and 65 cm high. There are tentative traces of a fosse outside the mound and this averages 1.4 m wide but it is extremely shallow. The fosse runs up against the shoulder of the drumlin along S sector. There is no trace of an outer bank.

OBSERVATIONS AND RECOMMENDATIONS

This site is similar in many ways to a ring-barrow. However the central mound lacks the curvature, normally associated with such a site. It may be however that this central mound was more circular but has been partly straightened through interference.