

The Heritage Committee
Community Resource Centre
Mayo Abbey
Claremorris
County Mayo

An Coimisiún Pleanála
64 Marlborough Street,
Dublin 1, D01 V902

Re: Observation regarding the Strategic Infrastructure Application for Planning Permission for the proposed Electricity Substation at Cloonbaul, Mayo Abbey, Claremorris, County Mayo.

ACP CASE REFERENCE NUMBER: VA16.324429

Dear Sir/Madam,

We request that An Coimisiún Pleanála refuses the Strategic Infrastructure Application for Planning Permission for the proposed Electricity Substation at Cloonbaul, Mayo Abbey, Claremorris, County Mayo.

While we recognise the importance of renewable energy development and Ireland's transition towards a low-carbon economy, we submit that this particular location is wholly inappropriate due to its proximity to the historic, archaeological, cultural, and ecclesiastical landscape of Mayo Abbey, one of the most significant early medieval monastic sites in Ireland. The proposed development would cause substantial and irreversible harm to the setting, character, integrity, and cultural significance of this unique heritage asset.

Mayo Abbey, historically known as "Mayo of the Saxons," occupies a place of exceptional importance in Irish and European ecclesiastical history. Founded in the seventh century by St. Colmán and associated with Saxon monks who accompanied him from Lindisfarne, the settlement became one of the foremost religious and educational centres of the early medieval period. For more than a thousand years "Mayo of the Saxons" remained the most important ecclesiastical centre in the region becoming in turn a diocese, a university town, a Norman town and finally giving its name to County Mayo, the third largest county in Ireland.

The Abbey represents a rare and tangible link between Ireland and Anglo-Saxon Christianity and forms part of a cultural landscape that has endured for more than thirteen centuries.

The significance of Mayo Abbey extends far beyond the surviving visible remains. The site contains layers of archaeological evidence accumulated over centuries of religious occupation, pilgrimage, settlement, burial activity, and agricultural use. The surrounding landscape forms an integral component of the historical setting of the abbey. Archaeological best practice recognises that heritage significance is not confined to standing structures or designated monuments but includes their wider visual, spatial, and cultural context.

The proposed erection of large-scale industrial wind turbines and substation adjacent to this historic landscape would fundamentally alter the character of the area. Modern wind turbines, by virtue of their height, rotating blades, lighting requirements, access roads, substations, and associated infrastructure, are highly dominant features in the landscape. Their visual presence would intrude upon important views to and from Mayo Abbey, not least from South and East Mayo to Croagh Patrick (St. Patrick's Mountain), and would diminish the sense of historical continuity and tranquillity that contributes substantially to the site's significance.

The assessment of impact should not be limited solely to direct physical disturbance of archaeological remains. International conservation principles recognise that visual intrusion and adverse effects on setting can significantly undermine the value and appreciation of heritage sites. The proposed turbines would become the dominant visual elements within the surrounding landscape and would compete directly with the historic landmark qualities of Mayo Abbey. This would result in a substantial erosion of the site's authenticity and cultural significance.

Particular concern arises regarding the possibility of undiscovered archaeological remains within the proposed development area. The lands surrounding Mayo Abbey have been occupied and utilised for centuries. Given the importance of the monastic settlement, it is highly probable that subsurface archaeological features, burial grounds, field systems, routeways, ecclesiastical enclosures, and associated structures may survive beyond currently recorded monument boundaries. Construction activities, including excavation for turbine foundations, cable trenches, access roads, and drainage works, carry a significant risk of disturbing or destroying archaeological material.

In this regard the proposal to build a four-acre 110KV Electricity Substation on an archaeologically rich site in Cloonbaul (Cluain Ball) (OS 101) and ancillary Grid Connections are of serious concern. This site which is located even closer to the monastic site in Mayo Abbey than the proposed wind farm has been described in the "Mayo Abbey Archaeological Survey" variously as an "enclosure", a "fairy fort" and a "ring-fort". The Survey concludes that the enclosure "is of immense archaeological significance because of the large area that it occupies". The enclosure has been considered potentially prehistoric or Neolithic and may contain evidence capable of changing our understanding of settlement around Mayo Abbey.

For a monument of potentially exceptional significance, preservation in situ should be the starting point. Archaeological excavation records destruction; it does not preserve the monument, its landscape setting or the possibility of future research using improved methods. The enclosure should not be treated as an isolated feature. Its relationship with the monastic landscape, routeways, other enclosures, burial grounds, settlement evidence, topography and paleoenvironmental record may be central to its significance. A 110KV substation, compound, foundations, services, access and landscaping could permanently damage the monument and its archaeological context. In addition, it is believed that the construction of such a large 110KV Substation is preparatory for future applications to erect more turbines in the immediate area of the monastic enclosure.

These developments also threaten the historic landscape setting that has remained substantially rural in character for generations. The value of Mayo Abbey lies not only in its archaeological remains but in the relationship between the ecclesiastical site and the surrounding countryside. Visitors experience the abbey as part of a historic landscape that

retains a strong sense of place and continuity. The introduction of industrial-scale energy infrastructure would fundamentally alter that experience.

In addition, the location of the proposed wind farm and substation in a bogland will involve the drainage of significant elements of that bogland. It is universally agreed that draining bogland in an archaeologically rich area to build a wind farm can cause significant and often irreversible damage to both the environment and cultural heritage. Lowering the water table accelerates peat decomposition, releasing stored carbon, degrading habitats, altering local hydrology, and increasing erosion risks. At the same time, drainage can destroy or damage buried archaeological remains and paleoenvironmental records that have been preserved for thousands of years in waterlogged conditions, including ancient trackways, settlements, artefacts, human remains, and evidence of past climates and landscapes. In Ireland, where peatlands contain some of Europe's most important archaeological archives, such impacts can result in the permanent loss of unique historical information that cannot be replaced once disturbed.

The economic implications for heritage tourism should also be carefully considered. Mayo Abbey forms part of County Mayo's rich heritage offering and attracts visitors interested in archaeological research, religious history, genealogy, and cultural tourism. Mayo Abbey, through its links with the nearby Ballintubber Abbey, Aghagower and Croagh Patrick, through the Tóchar Phádraig adds to that heritage tourism offering. Increasingly, tourists seek authentic historic environments that retain their traditional character. The industrialisation of the landscape surrounding the abbey could reduce its and those other destinations attractiveness as visitor destinations and undermine efforts to promote the area as a place of historical and cultural importance.

In addition to heritage concerns, the proposed development raises wider landscape and environmental issues. The cumulative visual impact of multiple large turbines across the rural landscape would significantly alter local character. The area surrounding Mayo Abbey is valued for its scenic qualities, open countryside, and historic associations. Such qualities are finite and once damaged cannot readily be restored.

The planning authority has statutory obligations to protect archaeological heritage, architectural heritage, and landscapes of cultural significance. National planning policy emphasises the need to safeguard archaeological resources and to ensure that development proposals do not adversely affect protected heritage assets or their settings. The precautionary principle should be applied where there is uncertainty regarding the extent of archaeological remains or the scale of potential impacts.

Furthermore, consideration should be given to the broader cultural importance of Mayo Abbey as a place of identity and community memory. Generations of local residents have maintained strong connections with this historic site. It forms part of the cultural inheritance of County Mayo and of Ireland as a whole. Decisions affecting such places should be guided by principles of stewardship and long-term public interest rather than short-term development objectives.

The location of renewable energy projects should be carefully selected to avoid conflict with nationally significant heritage assets. The objective of expanding renewable energy capacity does not require development in locations where substantial adverse impacts on irreplaceable

archaeological and cultural resources are likely to occur. Alternative sites that do not threaten a unique ecclesiastical landscape should be prioritised.

For the reasons outlined above, we respectfully submit that the proposed wind turbine development at Cunlaghfadda and Substation at Cloonbaul are incompatible with the protection and preservation of the historic, archaeological, cultural, and landscape significance of Mayo Abbey. The developments would adversely affect the setting of an internationally important ecclesiastical site, risk damage to archaeological resources, diminish the historic character of the landscape, and undermine the heritage value that has endured for more than thirteen hundred years.

We have now also become aware that the developer is making an application to Mayo County Council to develop a Battery Energy Storage System at a nearby site at Cloonbaul in close proximity to the Wind Farm and Substation. All three developments, the Windfarm, the Substation and the Battery Storage System are integral parts of the same project and their impact on the landscape and heritage of Mayo Abbey cannot be disconnected.

Accordingly, we request that An Coimisiún Pleanála refuses the Strategic Infrastructure Application for Planning Permission for the proposed Electricity Substation at Cloonbaul, Mayo Abbey, Claremorris, County Mayo.

Yours faithfully, for and on behalf of Mayo Abbey Heritage Committee,

Eddie Barrett

Jimmy Finn

Thomas Delaney

Chairperson

Secretary

Treasurer

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