

An Bord Pleanála

64 Marlborough Street,

Dublin 1,

D01V902

14.01.2025

Coolatober, Ballyforan

Ballinasloe

Co. Galway

H53 KD66

Re: Planning application for a 110 kilovolt electricity substation, approximately 7.5 kilometres of underground electricity line and all associated works at Moyvannan, Feamore, Lisbaun, Carrownolan, Carrowncloghan, Carrowkeeny, Ardmullan, Curraghboy, Gortnasythe, Derryglad, Eskerbaun, and Brideswell, County Roscommon

Ref. No. 321328

Dear Sir/Madam,

I attach my observations on the above application for your consideration. I also wish to request an Oral Hearing.

The fee of €50 is included

Yours faithfully



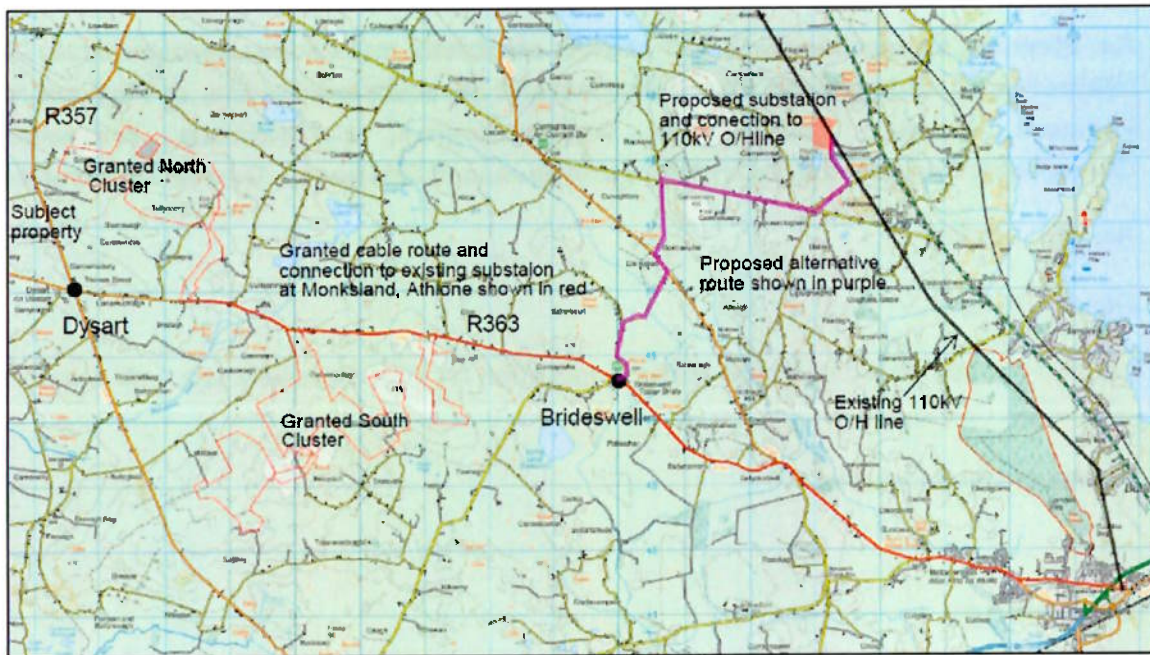
Ulick Burke BScEng CEng

1.0 Introduction

On the 23rd of Nov 2023 the Board granted Energia Developments permission, AB-313750-22, to construct a 17 turbine wind farm with a connection to the grid at an existing substation in Monkslands Athlone.

On the 25th of Nov. 2024 Energia applied to the Board for planning permission, reference ABP-321238-24, for the development of a 110 kV electricity substation at Moyvannan, Co. Roscommon, approximately 7.5 km of underground electricity line and all associated works including a connection to the existing 110kV overhead line at Moyvannan.

The granted and proposed developments are shown in Figure 1.



1.0 Figure 1: Site Layout (From MKO Drg. 190907-1)

2.0 Northern Cluster

ABP-313750-22 EIAR Ch.13 - Cultural Heritage and Archaeology describes the area around turbine 5 as follows

Turbine 5 (Figure 13-3) will be located in a dry flat field with long grass (Plate 13-15). Views from the proposed location of Turbine 5 are good to east, moderate south, and poor north and west. Turbine 5 will extend slightly into the field to the south, and this area was noted as being dry, flat and with short grass. Turbine 5 will be located approximately 45m southwest of RMP RO047-010001 (ringfort).

The access road leading south west to T5, will be located approximately 20m west of RMP RO047-015004 (ringfort). This monument was noted as being a badly denuded sub-circular grass-covered area measuring approximately 25m north/south x 20m east/west.

A sunken, overgrown concrete-lined feature was noted approximately 25m east of the access road leading to Turbine 5 in the southern end of RMP RO047-015005 (field system), and approximately 10m southwest of RMP RO047-015004 (ringfort). As with other modern agricultural features within the general landscape, it was surrounded by a low stone wall and is of no archaeological or architectural significance.

A meteorological mast is proposed west of Turbine 5, and the site visit revealed this area as being flat, dry and with short grass. An internally overgrown well-constructed and generally well maintained stone-walled feature of no archaeological or architectural significance, measuring approximately 12m north/south x 7m east/west, was noted a short distance outside the EIAR Site Boundary (Plate 13-16). It was not possible to inspect the feature internally due to its very overgrown nature. An entrance was not recorded, and it is possible it represents a similar type of feature to that recorded north of the spoil storage area east of Turbine 2, i.e. a modern agricultural pit surrounded by reused stone walling.

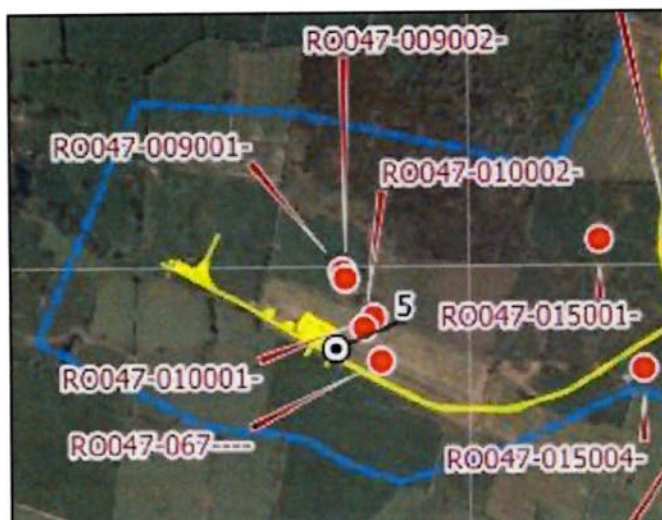


Figure 2: Extract from Figure 13-7 RMP Sites within the Northern Cluster of the EIAR Site Boundary (EIAR Chapter 12)

RO047-067--- : Souterrain : CRONIN
Description: On a gentle S-facing slope c. 30m S of rath (RO047-010001-). An underground passage was discovered in 1934 (Irish Times 3-1-34; Connaught Tribune 6-1-34) which is described locally as a passage (L c. 4m) leading through a creep to a beehive chamber. It was closed c. 1980.
Compiled by: Michael Moore
Date of upload: 24 August 2010

RO047-067 Description

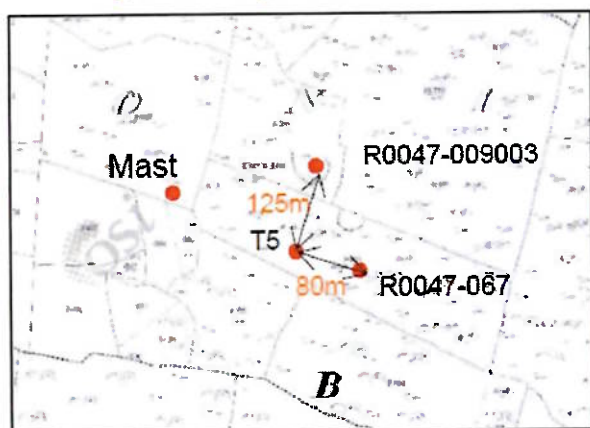


Figure 3: OSI 25" Map (1880) with T5 and RO047-009003 shown

RO047-009003- : Redundant record : CRONIN
Description: There is a local report of an underground chamber discovered when a tractor fell into it and which was subsequently backfilled. Situated just to W of rath (RO047-009001-). This is probably the same as (RO047-067---), but the adjacent rath is (RO047-010001-).
Compiled by: Michael Moore
Date of upload: 24 August 2010

RO047-009003 Description



Photo 1: Area around T5 before land reclamation – 1996

ABP-313750-22 EIAR Chapter 12 does not include RO-047-009003.

It is not as described the same as RO047-067 rather it is part of a network of caves and conduits in the area. Photos 2 and 3 taken in 1996 are an example of these caves.



Photo 2: Entrance to cave Cronin (1996)

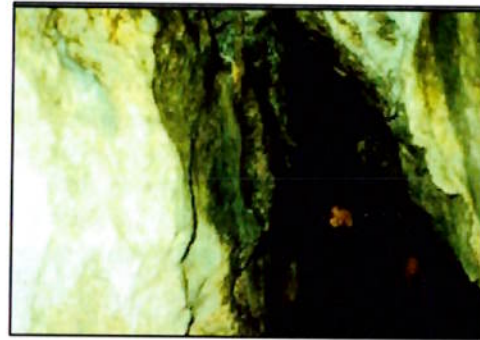


Photo 3: Inside cave which was high enough to accommodate an adult. (Cronin 1996)



Figure 4

The area described by Moore in 2010 as An area of limestone karst with exposed limestone paving. There is no trace of a souterrain, and the site is likely to be a swallow hole or natural cave. No swallow holes are evident apart from one which may have been backfilled with stones is shown in Figure 4.

This site is unreclaimed and is an example of what the South Roscommon landscape looked like before reclamation as shown in Photo 1.

There is no professional standard for defining the extent of a study area when assessing the likelihood of effects on archaeological, architectural, cultural or protected heritage remains. The area of the pristine limestone karst and associated cave/ swallow hole should have been recorded in the EIAR.

As the proposed grid connection will be underground and the majority of cabling will be within the existing road, a 100m study area has been applied around the Grid Connection route. Areas of land take associated with the wind turbine haul route have also been assessed.¹

The proposed grid traverses a karst terrain where the extent, direction and area of influence of springs, flowpaths etc. are unknown. In this case a 100m study area is not adequate.

¹ ABP313750-22 EIAR Ch.13 - Cultural Heritage and Archaeology

3.0 Ancient road between Roscommon town and Ballinasloe town

*The site identified on the Record of Monuments and Places 048-097 comprises a large area of land on both sides of the stone wall referred to above. Site 97 is identified as containing a number of field- systems, a cashel and a road. **The road in question would appear to be the laneway which ends in a cul-de-sac near where Site 048-117 is located.** Site 117 is stated to be a cross on the Record. On the Ordnance Map it is identified as a cross on the site of a former dolmen. **The EIS indicates that the access road serving the wind farm would cross the road in question. One of the proposed mitigation measures is that test trenching be carried out at the location where the access track crosses the road.** There are a number of field systems identified as sites or monuments in the Record in this general area.²(emphasis added)*

The road described in ABP-244347 Inspector's report is shown in Area A of Figure 5. It is a section of the ancient road between Roscommon town and Ballinasloe. The full length of the road in relation to the granted and proposed developments is shown in blue on Figure 5. The route can be mapped by joining the wayside crosses mapped on the OSI Discovery Series. These crosses date from medieval times and served as waymarks for walkers and pilgrims or designate dangerous places. In the case of South Roscommon they may have served both purposes – the South Roscommon tribes were not known as *Sheep Stealers* without a reason.

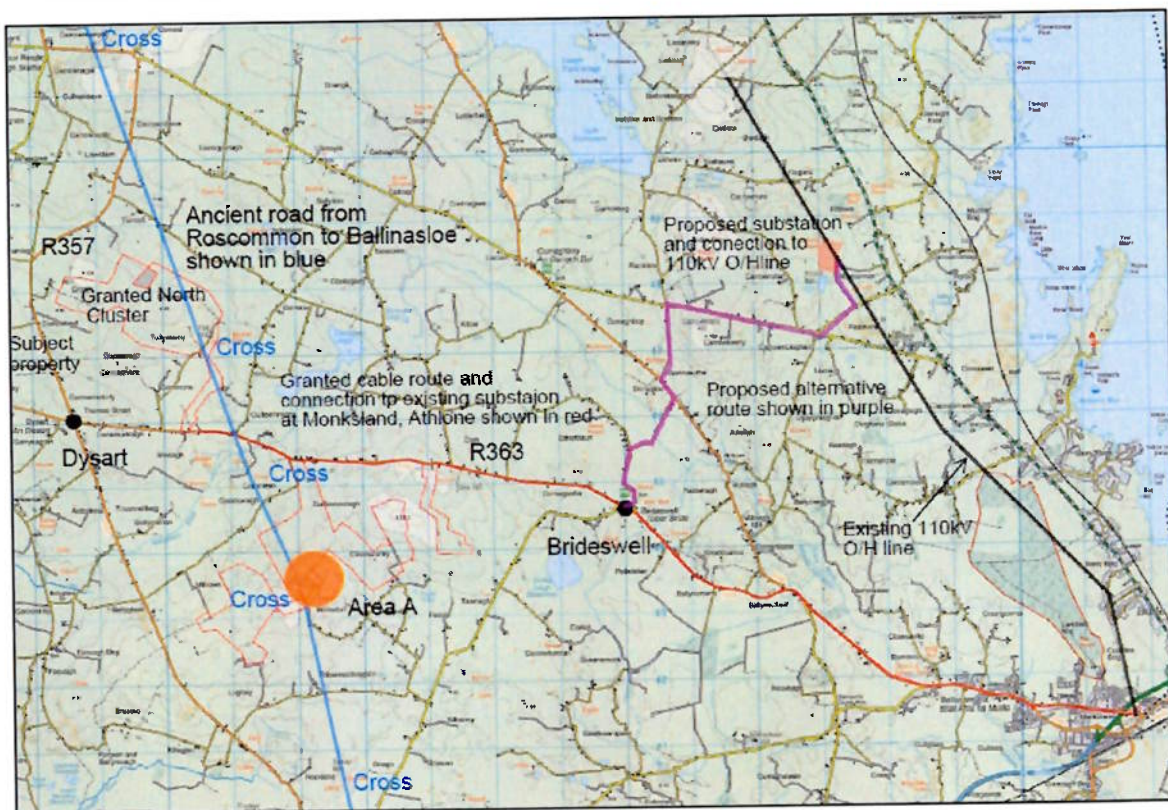


Figure 5

The section of road referred to in ABP-244347 Inspector's report is Area A in Figure 5

² ABP244347 (Phase 2) Inspectors Report

Many of the fields within the landholdings appear to have been reclaimed by bulldozing rocks into rock piles and spreading available soil over the reclaimed land possibly during the 1970s when grants were available for such land reclamation projects. Other parts of the landholding still remain with boulders outcropping and some of these lands are overgrown with scrub.³

The reclaimed land as described by the ABP 244347 Inspector is shown in Figure 6. What is described as scrub is pristine karst.

Bulldozing rocks into rock piles is shown in Photos 4 to 8

The road in question would appear to be the laneway which ends in a cul-de-sac near i.e. the ancient road end is shown in Photo 11. This section of the road is intact and still has the hand-picked limestone cobble stones used in its formation. The road is covered in a layer of Clause 804 stone to protect it.

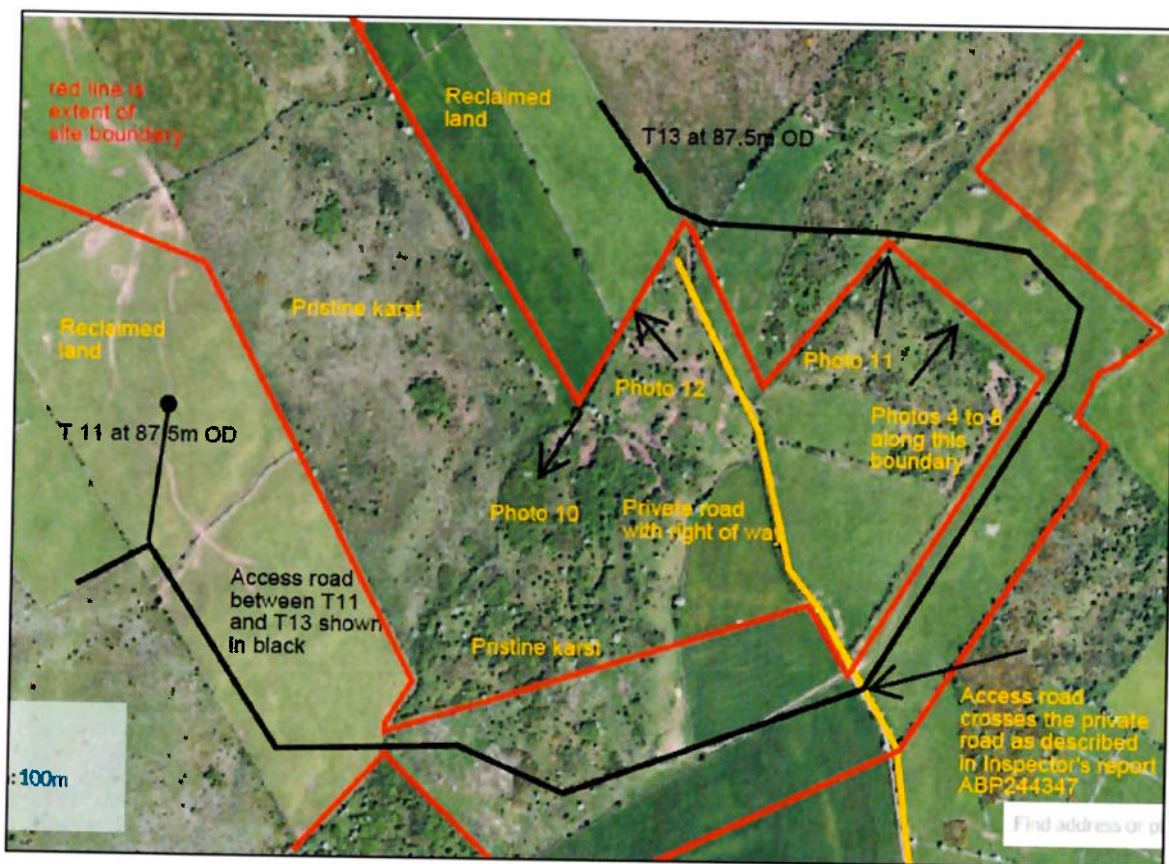


Figure 6 Area A

³ ABP244347 (Phase 2) Inspectors Report

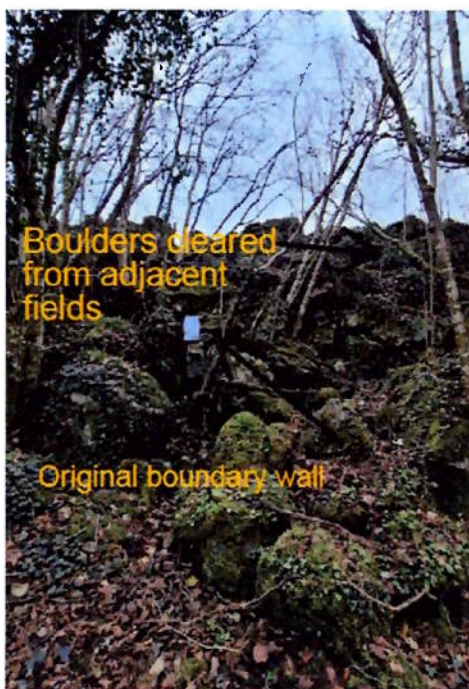


Photo 4

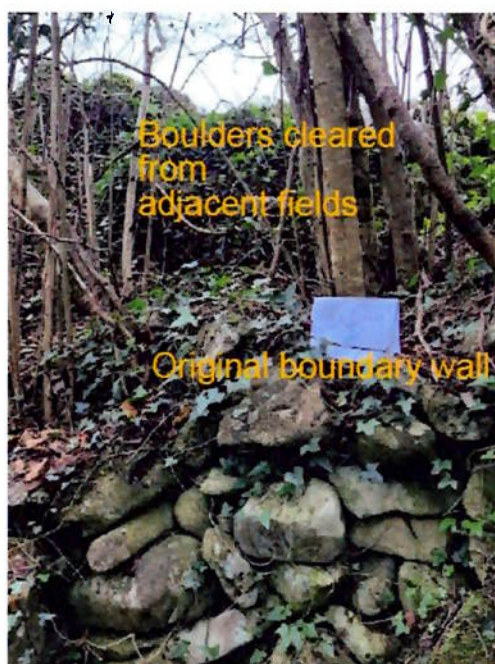


Photo 5



Photo 6



Photo 7



Photo 8



Photo 10

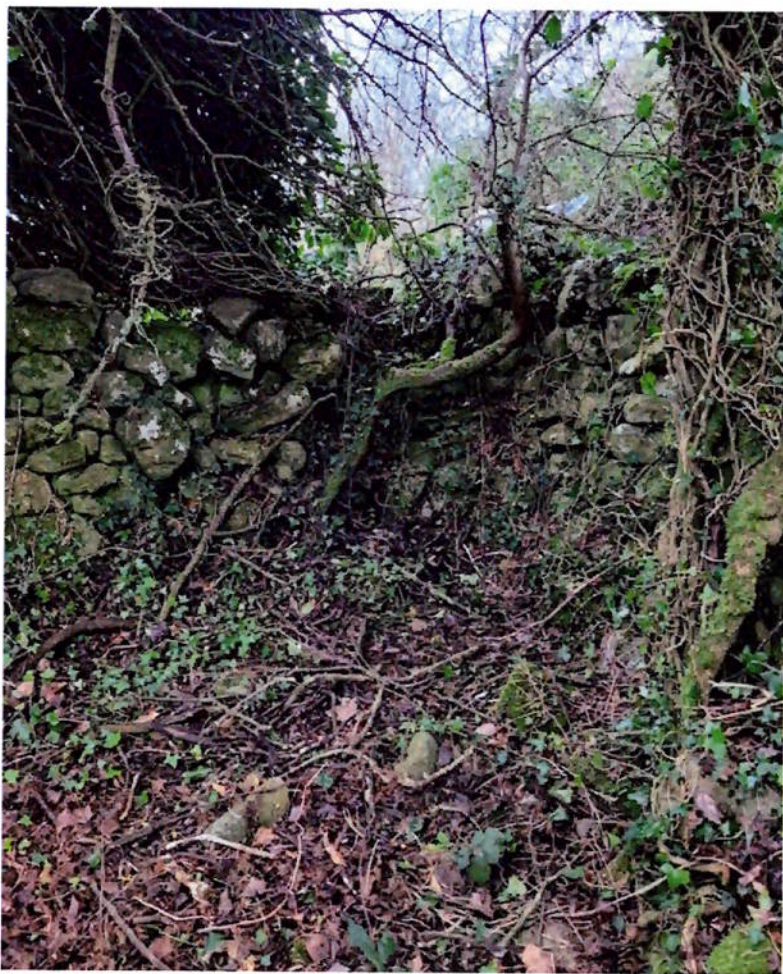


Photo 11



Photo 12