Submission / Observation on Proposed Grid Connection Works to An Coimisiún Pleanála (the "Board")

Planning Reference: APC 324156-26
Project: Cahermurphy West Wind Farm Grid Connection (110kV Underground Cable)
Applicant: Cahermurphy Renewables DAC
Submitted by: James McMahon
Address: Dunneill, Killimer, Kilrush, Co. Clare V15 WP29
Date: 15 May 2026

Introduction and Overview

I wish to make this submission in respect of the Proposed Grid Connection works, specifically where the proposed cable route passes immediately adjacent to my parents' dwelling along the L2054 local road. This submission is made on behalf of myself and my parents, **Michael and Dympna McMahon**, who reside at the property and are directly affected by the proposed works.

This submission is not a general objection to the principle of renewable energy. Our concern relates to the Applicant's assessment of the proposed grid connection route, particularly where the route passes in very close proximity to sensitive receptors and features present at this location, including:

- **A private well and associated underground water infrastructure serving the dwelling and property;**
- **Farm, dwelling and emergency access arrangements;**
- **Roadside boundary features, outbuilding and agricultural infrastructure;**
- **A recorded ringfort located approximately 5 metres from the proposed grid route;**
- **Nearby bogland, ecological receptors and bird activity; and**
- **The adequacy of the EIAR/NIS and proposed mitigation for the grid connection corridor.**

These matters are outlined in more detail below. A detailed map and photographs showing the key areas of concern accompany this submission for context and ease of reference **(Annexes 1-3)**. Further information and targeted mitigation should be required before any decision is made on the application.

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1. Private Well and Sole Water Supply

The proposed works would take place within approximately **5 metres of an established private groundwater well**. This well is the **sole potable water supply** to the dwelling and adjoining farm. An underground water connection also extends beneath the public road from the well and supplies water to livestock infrastructure on adjoining lands.

This is a highly vulnerable water supply. Any interference with the well, the groundwater feeding it, or the associated water pipework beneath the road could have immediate and serious consequences for the habitability of the dwelling, the operation of the farm, livestock welfare and access to safe drinking water.

EIAR Chapter 9 – Water states that **no assessment of wells** located along the Proposed Grid Connection cable route was undertaken, whether within public road or private land sections, based on an assumption that trenching works within the public road corridor would have no potential effects. This is difficult to reconcile with Health Service Executive (HSE) guidance recommending that private drinking water supplies and hydrological connections be specifically considered within the EIA process, particularly where excavation works are proposed in the immediate vicinity of established groundwater infrastructure.

In identifying local wells and groundwater receptors, the Applicant relies on the Geological Survey Ireland well database, even though the database is stated to be **non-exhaustive** and mapped well locations may contain **local inaccuracies**. The private well serving the property is **not identified** on the Applicant's mapping (**see Annex 3, Figure 1**), despite being directly beside the proposed cable route and **clearly visible** from the public road (**see Annex 2, Photo 1**), with both a prominent cast-iron hand pump and pumphouse marking its location.

This is a material omission and raises concern about whether the receiving environment at this location has been properly identified and assessed prior to concluding that the risk of impact is "very low". The documentation does not make it clear whether the well, its groundwater source, recharge area, vulnerability, construction details or related water pipework beneath the public road were subject to any focused hydrogeological evaluation. The absence of this private well from the Applicant's mapping or public datasets does not mean that it is absent on the ground, and it does not remove the Applicant's obligation to identify and assess sensitive receptors along the route.

Excavation and trenching works of the nature proposed introduce **credible risks**, including disruption of groundwater flow or recharge, sediment or fuel contamination, damage to the underground water connection, alteration of roadside drainage and subsurface flow paths, reduction in well yield or water quality, and temporary or permanent interruption of the sole water supply.

The Applicant should therefore provide a hydrogeological evaluation of the private well and surrounding ground conditions. At a minimum, this should include accurate mapping of the well and underground water pipe, baseline water quality testing, analysis of groundwater pathways between the trench and well, construction protection measures, monitoring during and after construction, an emergency alternative water supply protocol, and a clear remediation plan if contamination, damage or loss of supply occurs.

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2. Hydrological and Ground Stability Considerations

EIAR Chapter 8 – Land, Soils and Geology acknowledges the presence of peatland, blanket bog, groundwater interactions and hydrologically sensitive ground conditions within the wider project area. However, the EIAR states that "**no peat is present along the Proposed Grid Connection cable route *(i.e. public roads)***" and, on that basis, the cable route was not subject to peat stability evaluation.

The EIAR further classifies the soils and subsoils along the Proposed Grid Connection as being of "low importance" and states that no peat or soils deposits are designated along the route. However, that broad classification does not appear to address a number of localised issues along the corridor, including:

- Roadside drainage interactions;
- Adjoining soft or boggy ground;
- Local settlement or subsidence risk;
- Variable ground conditions beneath legacy rural roads; and
- Trench backfilling and reinstatement risk.

The Proposed Grid Connection involves approximately **25 kilometres of underground cabling works**, primarily along narrow rural roads and roadside drainage networks. While the assessment appears to be confined to the public road corridor itself, areas of boggy or poorly draining ground appear to adjoin sections of the route, including locations where localised **roadside settlement or subsidence** has been observed.

Local residents recall that a short section of the road previously required significant repair works, understood to have been attributable to **settlement, subsidence, or poor ground conditions**. This local history should be verified by the Applicant through targeted ground investigation, rather than being dismissed on the basis that the cable is located within the public road.

This concern is also consistent with comments recorded elsewhere in the EIAR. The Department of Transport response warns that where roads are legacy roads with *no designed road structure* and *potentially poor or poorly drained subgrade*, design must take account of variable ground conditions and not rely only on *general soil assumptions*

(EIAR Chapter 15 – Material Assets). Transport Infrastructure Ireland also notes that grid connection works within roads can give rise to technical *road safety issues*, including differential settlement due to backfilled trenches.

Further route-specific geotechnical and hydrological analysis should therefore be undertaken as a priority for sections of the local road network that traverse or adjoin soft, poorly drained, or potentially unstable ground. This should include an assessment of:

- Drainage interactions;
- Trench reinstatement;
- Settlement risk;
- Road stability;
- Subgrade conditions;
- Potential effects on adjoining lands, structures and private water infrastructure.

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3. Archaeological Sensitivity of Grid Connection Route

The proposed grid connection also raises material archaeological considerations. The Applicant's Cultural Heritage chapter confirms that the study area for the proposed grid connection extends to 50 metres and includes recorded and previously identified cultural heritage sites (EIAR Chapter 13 – Cultural Heritage). The chapter identifies a number of recorded monuments within that study area, including **AH113 / CL067-059**, a recorded ringfort (rath) at Doonnaghurroge, located approximately **5 metres east of the proposed grid route**.

This represents an extremely limited separation distance from the proposed excavation and construction works. The issue is not simply whether the trench would directly intersect the monument. At approximately 5 metres, the EIAR does not adequately set out how potential effects - such as trenching, vibration, ground disturbance, plant movements, access arrangements, drainage changes, and the proposed construction methodology - have been evaluated in relation to this specific recorded monument.

This concern is reinforced by the Applicant's own methodology, which classifies RMP sites as **high-sensitivity receptors** (Chapter 13). In that context, the proximity of a recorded ringfort to the proposed grid connection clearly gives rise to a material concern. It is reasonable to expect a more detailed, route-specific evaluation and, where necessary, clearly defined mitigation measures. As currently presented, the archaeological consideration of this section of the grid connection does not appear sufficiently robust to support the conclusions reached.

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4. Access, Emergency Services and Health and Safety

The proposed grid connection works would take place on a narrow local road with no realistic alternative access to the dwelling or farm. The planned trenching appears to extend into the main driveway access. This is illustrated in **Annex 2, Photo 1**. This gives rise to a **material concern** regarding residential access, agricultural access, emergency services and health and safety during construction.

This is not a theoretical risk. The property has recently required emergency fire service access, underscoring the need to ensure that access for emergency and essential services is not impeded during the works.

The application does not adequately demonstrate how uninterrupted access would be maintained during trenching, ducting, backfilling, reinstatement, or the implementation of temporary traffic management measures at this constrained location. The HSE response, as recorded in *EIAR Chapter 5 – Population and Human Health*, expressly highlights concerns relating to narrow country roads, construction traffic, drinking water supplies, and cumulative impacts. These concerns are directly applicable in this instance.

A generic Construction Environmental Management Plan or Traffic Management Plan is not sufficient in this context. A **location-specific Health and Safety, Traffic Management and Access Plan** should be required. This should set out clear measures to maintain access to the dwelling and farm, including emergency access arrangements, the use of temporary trench plates or certified covers where necessary, protection of residents, visitors, and livestock, advance notice to the landowner, named contractor contacts, and defined out-of-hours emergency procedures.

There should also be a clear requirement that no trench, plant, barrier, parked vehicle, or temporary traffic measure may obstruct emergency access to the property. Furthermore, a **property-specific access arrangement** should be agreed in advance with the affected residents and landowner.

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5. Boundary Walls, Vibration and Reinstatement

Two long-standing dry-stone boundary walls form an integral part of the character of the property. This is illustrated in **Annex 2, Photo 2**. One wall lies approximately 2–3 metres from the proposed works, with both walls located along the cable route. Dry-stone walls are particularly vulnerable to vibration, settlement, accidental impact, undermining and changes in roadside drainage, as their stability depends on long-established ground support and the interlocking of stones.

EIAR Chapter 12 – Noise and Vibration acknowledges that, where existing damage or structural vulnerability is present, acceptable vibration limits may require reduction. However, the application does not demonstrate that any property-specific structural

review or vibration analysis has been carried out in respect of these walls or adjacent structures. Given the proximity of the trenching works, this represents a **material omission**. The Board should not be asked to rely on post-consent construction management measures to address matters that ought to have been clearly identified, examined, and mitigated at application stage.

Accordingly, the Applicant should be required to provide pre- and post-construction condition surveys of the walls, together with clearly defined vibration limits and monitoring measures, appropriate protective provisions during construction, and a repair protocol based on traditional dry-stone walling techniques using matching local stone.

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6. Construction Impact and Duration

The proposed works are substantial in scale and linear extent, involving trenching over a significant distance in close proximity to existing residential and agricultural uses. The impact at this location is not limited to the physical trench line, but also includes access disruption, traffic management, noise, vibration, dust, drainage interference, reinstatement works, and the sequencing of construction activities.

EIAR Chapter 12 – Noise and Vibration recognises that the grid connection constitutes a linear construction activity and that impacts are greatest when works are *closest to sensitive receptors*. It also acknowledges that significance depends on the duration and character of the impact.

Notwithstanding this, the application does not clearly demonstrate that the localised duration, sequencing, and cumulative impact of works at this specific location have been adequately considered. This is particularly important where the proposed works would occur adjacent to sensitive features, including the private well, boundary walls, access points, and underground water infrastructure, which do not appear to have been fully identified in the application documentation.

In these circumstances, the potential for construction-related disruption, traffic management constraints, and impacts on emergency access may be understated. Further information should be provided on the likely duration of works at this property frontage, the proposed sequencing, temporary access arrangements, daily reinstatement or safety measures, and communication protocols with affected residents.

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7. Future Property Use, Access and Maintenance

There is an existing outbuilding on the property near the public road and proposed cable route. While no planning application is currently before the Board in respect of that structure, it is a long-standing roadside building which may require future maintenance,

repairs, access, service connections, drainage works, and other routine property-related works.

The proposed grid connection would appear to pass close to this property frontage, at a distance of approximately 20 metres. It is unclear from the application documentation whether the presence of permanent underground electrical infrastructure, including any wayleave, safety, maintenance, excavation, or consent requirements, could affect the carrying out of such works along this section of the route.

This is not raised as a standalone objection to the application. Rather, it serves as a further example of the need for clear route-specific consideration of the grid connection corridor where it passes adjacent to existing roadside property features.

Clarification should therefore be provided as to whether the proposed cable route would impose any **long-term constraints** on future access, maintenance, services, drainage, or excavation works at this location.

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8. Adequacy of Route-Specific Biodiversity and Ornithological Assessment

EIAR Chapter 6 – Biodiversity and *EIAR Chapter 7 – Birds* confirm that ecological and ornithological studies were undertaken in respect of the Proposed Project, including the Proposed Grid Connection. The EIAR refers to multi-disciplinary walkover surveys and acknowledges the potential for habitat disturbance and ecological effects associated with construction works.

However, notwithstanding the methodology described, the level of route-specific ecological and ornithological detail relating to the proposed cable corridor appears limited. In particular, it is unclear whether sufficient location-specific consideration has been given to roadside hedgerows, the timing of vegetation clearance, nesting birds, and cumulative disturbance along the route.

This is relevant as the proposed cable route passes through a rural roadside environment where hedgerows, drainage features, and adjoining lands may support bird species and other ecological receptors. While construction-related disturbance is referenced in general terms, it is not clear how vegetation clearance would be managed in practice, including during the bird nesting season, particularly where the Applicant expects the cable route works to extend over approximately **12 months**.

Further route-specific ecological information should therefore be provided, including ecological constraints mapping for sensitive sections of the route, pre-construction surveys where required, clearly defined vegetation clearance protocols, nesting bird safeguards, and species-specific mitigation measures.

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9. Community Engagement and Consultation Along the Grid Connection Route

The Planning Report refers to having conducted "extensive consultation with the local community" and to the appointment of a Community Liaison Officer. However, as directly affected residents along the proposed cable corridor, our experience is that no meaningful or substantive engagement took place regarding the potential impacts of the underground grid connection works on this property.

From my review of *EIAR Appendix 2-4 – Community Consultation Report*, face-to-face engagement appears to have been primarily focused on residents within a **2-kilometre radius of the proposed wind farm site**. I could not identify from the documentation any comparable programme of direct engagement with residents and landowners affected by the proposed underground grid connection route.

This is relevant because early engagement may have identified important localised constraints before the application was lodged, including the private well, associated water pipe, access constraints, boundary features, drainage issues and future land-use concerns.

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10. EIAR/NIS Adequacy and Site-Specific Assessment

The principal issue arising from the proposed grid connection route is not simply that the works would be inconvenient or disruptive. Rather, the concern is that the application documentation does not appear to adequately assess the **actual receiving environment** along this specific section of the route.

In particular, the documentation does not appear to identify or assess the established private well located within approximately 5 metres of the proposed works, the associated water connection serving livestock, nearby bogland/peat-influenced conditions, local ecological features, long-standing dry-stone boundary walls, or the practical implications for emergency and property access during construction. These are site-specific features and constraints directly relevant to the likely construction-stage impacts of trenching, traffic management, vibration, drainage disturbance, peat or saturated ground disturbance, pollution prevention, reinstatement and temporary obstruction.

The planning history of the wider Cahermurphy proposal is also relevant, including **ABP-311044-21 / Clare County Council Reg. Ref. 20/658**, which concerned a previous wind farm application with a different grid connection route. In that case, the grid connection formed part of the development assessed, and technical consultees raised issues including road opening, traffic management, road condition surveys, peat stability, drainage, water quality protection and ecological impacts. This history demonstrates that the grid connection and associated construction works are not peripheral matters and require route-specific assessment. Although that case concerned a different grid

connection, it confirms that such works require assessment by reference to local conditions. **The same principle applies here**.

A generic conclusion that impacts can be mitigated does not address the absence of proper baseline identification and route-specific assessment. The EIAR/NIS should demonstrate, by reference to the actual local conditions, that the proposed works would not adversely affect private water infrastructure, nearby bogland or peat-influenced ground, sensitive archaeological receptors, local biodiversity, road stability, boundary structures, drainage patterns or safe access to the property.

A recurring concern throughout this submission is that the assessment appears to understate localised risk along the grid connection route. This is most clearly illustrated by two sensitive receptors located adjacent to the proposed works: the private well and associated water infrastructure serving the dwelling and property, and **AH113 / CL067-059**, a recorded ringfort identified in the Applicant's own Cultural Heritage chapter as approximately 5 metres from the proposed grid connection route. These are not remote or speculative concerns. They are specific receptors close to trenching and construction activity, and in both cases the documentation should demonstrate clear, receptor-specific evaluation and enforceable mitigation.

For these reasons, the current assessment does not fully address the location-specific risks arising along this section of the proposed grid connection route. The cable route should not be treated as a minor ancillary element where the evidence indicates that its construction would pass in close proximity to sensitive receptors and constraints.

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11. Requested Further Information / Conditions

Further information and/or site-specific conditions should be required in respect of this section of the Proposed Grid Connection route, including:

1. Identification, mapping and assessment of the private well and associated underground water connection;
2. Baseline water quality, well yield and water level testing, together with monitoring during and after construction;
3. An emergency alternative water supply and remediation protocol in the event of contamination, damage or interruption of supply;
4. A targeted access, emergency services, traffic management and health and safety plan for works at the property frontage;
5. Pre-construction and post-construction condition surveys of the dry-stone boundary walls, with vibration controls and appropriate repair protocols;
6. Road stability, drainage, trench reinstatement and settlement risk assessment for this section of the route;

7. Route-specific geotechnical, hydrological, ecological and archaeological safeguards where required; and
8. A route-specific engagement protocol to ensure that identified wells, water pipes, access needs, drainage issues and boundary features are incorporated into final construction method statements before works commence.

Conclusion

For the reasons set out above, I respectfully submit that the Board should require the Applicant to provide further information at this location before any decision is made. In particular, the Applicant should be required to assess the private well and associated water infrastructure, address the recorded ringfort located approximately 5 metres from the proposed grid route, demonstrate how uninterrupted residential, agricultural and emergency access will be maintained at all times throughout the works, and provide appropriate protection, monitoring and remediation measures for the well, boundary walls, road structure and farm access.

The EIAR and application documentation do not appear to provide a sufficiently robust assessment of the receiving environment or the likely localised effects of the proposed grid connection works at this property frontage. In the absence of this further information, I submit that the Board cannot safely conclude that the proposed works would avoid unacceptable impacts at this location.

If the Board is minded to approve the proposed development, appropriate location-specific conditions should be attached requiring hydrogeological assessment, baseline and post-construction water testing, emergency water supply arrangements, access protection, vibration monitoring, condition surveys and full reinstatement/remediation protocols.

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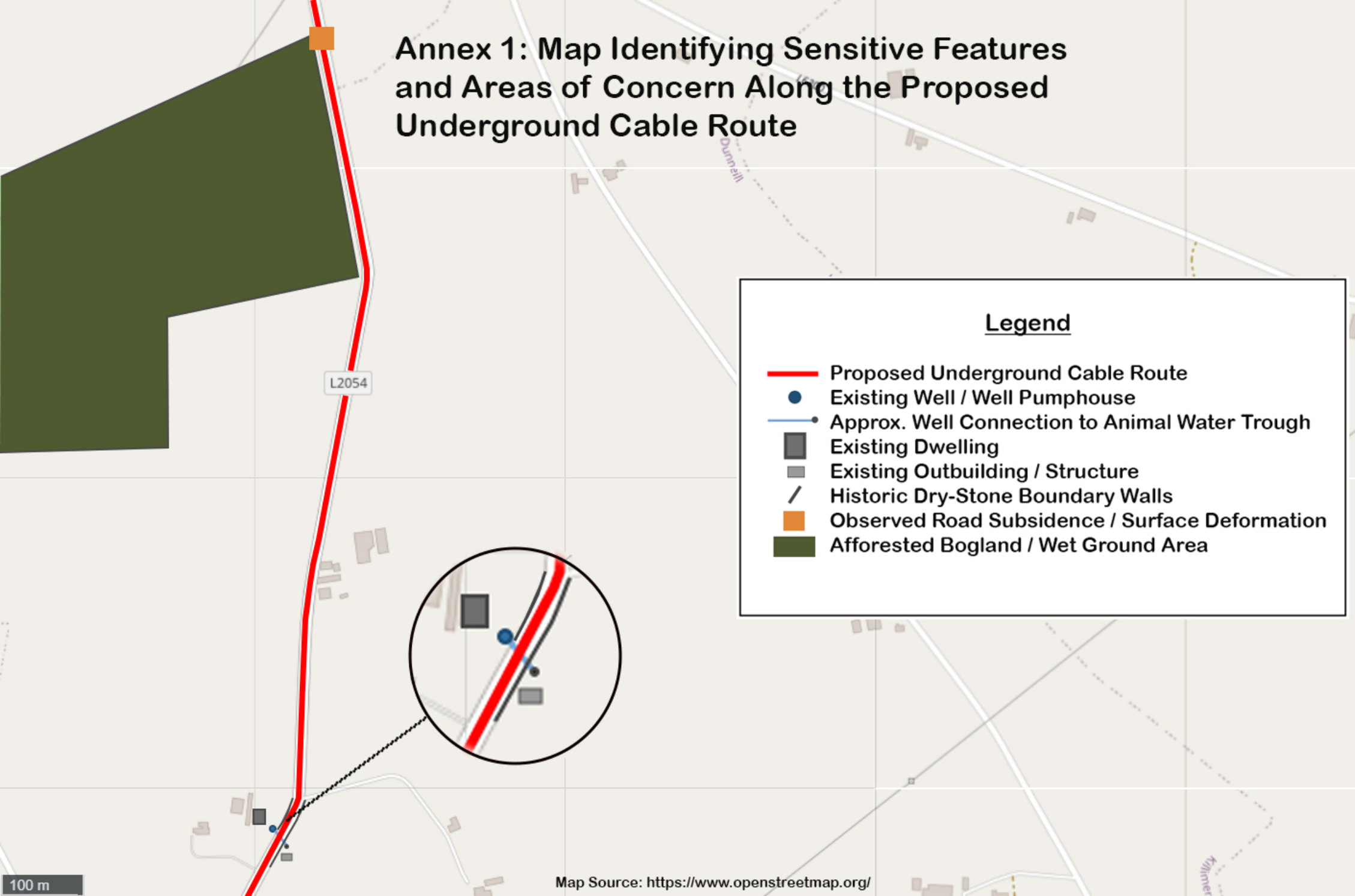
Signed: 

Name: James McMahon

Date: 15 May 2026

Annex 1: Map Identifying Sensitive Features and Areas of Concern Along the Proposed Underground Cable Route



Annex 2: Contextual Photographs of Property Frontage and Proposed Grid Connection Route

Photo 1: Main dwelling access from L2054. The **white pumphouse and well infrastructure** are clearly visible from the public road, and the **proposed trenching appears to extend into or immediately adjacent to the driveway entrance and property frontage.**

Photo 2: Narrow section of the L2054 along the proposed grid connection route. The **orange line indicates the approximate cable route,** running along the road edge immediately adjacent to the **long-standing dry-stone boundary wall**, rather than the centre of the carriageway.

Source: Google Street View / Google Maps imagery

The surface water abstraction from Doo Lough, which is a lake DWPA, is dealt with above in Section 9.3.11.1.

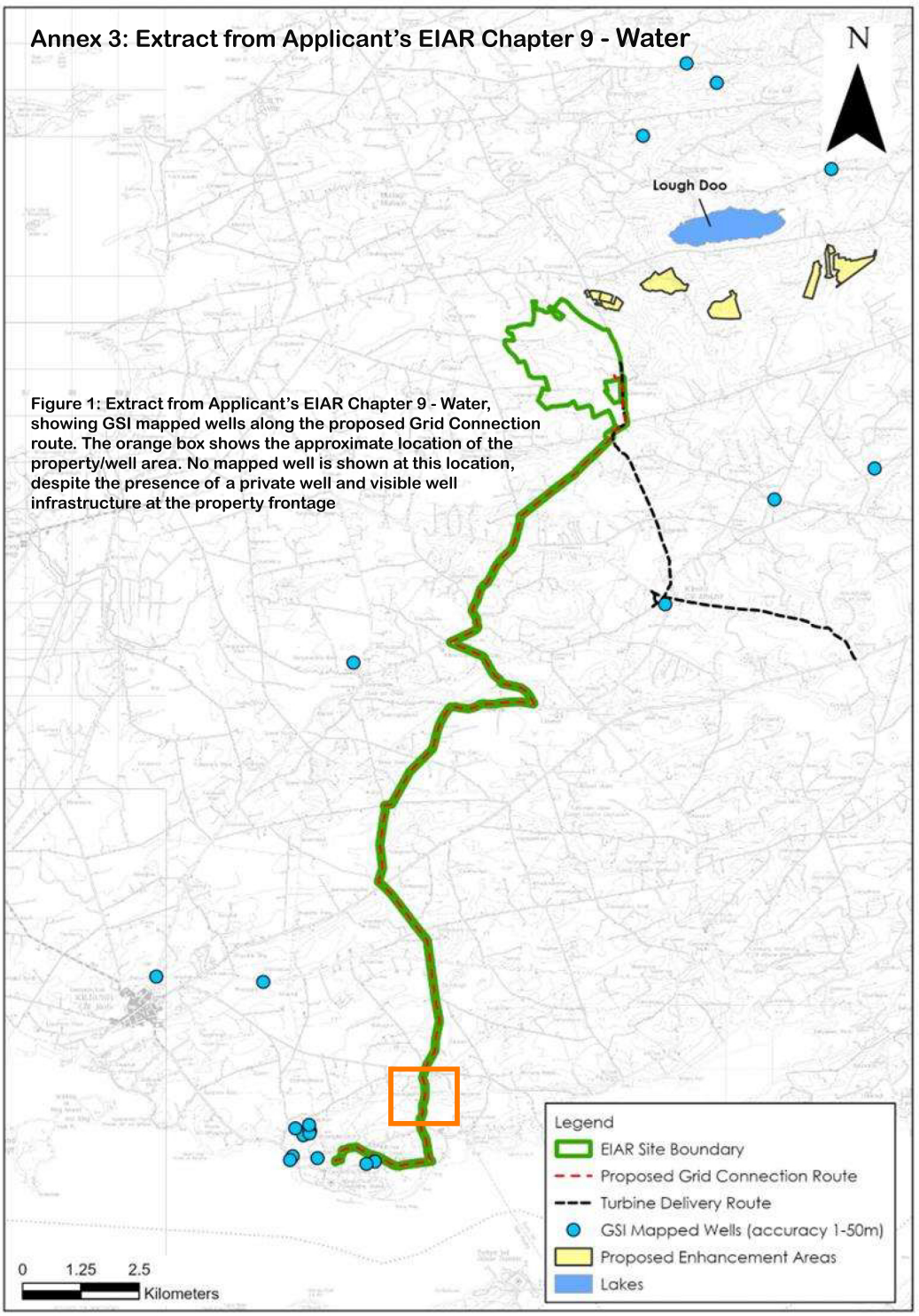


Figure 9-9: Water Supplies