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V95 R7F8

AN COIMISIÚN PLEANÁLA	
LDG-	087921
ACP-	
18 MAY 2026	
Fee:	5000
Time:	12:47

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

Friday 15th May 2026

Planning Reference Number: ACP 324156-26

Re: Objection to Planning Application ACP 324156-26 - Proposed 110kV Grid Connection Route.

We are making this submission as residents of the Cahermurphy area in West Clare directly affected by the proposed 110kV grid connection between Cahermurphy and Moneypoint.

We wish to state clearly that we support renewable energy and Ireland's transition to a low-carbon future. Our community has actively contributed to this transition through widespread adoption of solar energy and sustainable practices. However, support for renewable energy cannot extend to developments that are inadequately defined, insufficiently assessed, or that place disproportionate environmental and community burdens on rural residents.

Having reviewed the planning documentation, we respectfully request that An Coimisiún Pleanála refuse permission for this grid route application.

A central concern throughout the application is that the project being assessed is not the final project that will actually be constructed.

Key elements of the development are repeatedly described as *indicative, to be agreed or subject to detailed design*. This applies to major infrastructure components including cable alignment, joint bays and link boxes, HDD crossings and construction compounds, utility crossings, working widths and land take.

These are not minor technical details. They directly determine how close works will be to homes, how much land will be disturbed, what impacts there will be on drainage, peat stability, heritage features, and local roads and the duration and intensity of construction at specific locations.

In effect, what is being assessed is only a broad corridor rather than a defined project. Planning consent cannot lawfully be granted where the final development remains unknown.

A significant amount of essential detail has been deferred until after permission would be granted.

This includes the Construction & Environmental Management Plan which is described as a “*live document*”, traffic management arrangements that are not yet agreed with Clare County Council and drainage and environmental protection measures that are left to the detailed design stages.

This approach means impacts are assessed now while mitigation measures remain uncertain. Mitigation must be clear and assessable at the time of decision-making, not postponed until construction.

Because the project design remains unfixed, the Environmental Impact Assessment cannot provide reliable conclusions.

Uncertainty exists regarding which landowners are affected, the construction timelines and cumulative disruption, the hydrology and peat impacts, the cultural heritage risks and the electromagnetic field (EMF) assessment along specific routes.

The environmental conclusions therefore depend on assumptions about a design that does not yet exist.

Although legally separate applications, the wind farm and grid connection are functionally inseparable. The wind farm cannot operate without the grid connection.

However, the grid route is assessed at a noticeably lower level of detail within the EIAR. This has resulted in inconsistent standards of assessment, missing information for a critical part of the overall development and an incomplete understanding of cumulative environmental effects.

This undermines the integrity of the assessment process.

The Natura Impact Statement concludes that there will be no adverse effects on European sites. However, this conclusion relies upon mitigation measures not yet defined, surveys that are to be updated later and management practices to be refined post-consent.

European law requires that there be **no reasonable scientific doubt** regarding impacts on protected sites. Where key project details remain unknown, this legal standard cannot be satisfied.

The documentation contains conflicting information relating to the final route alignment, the total route length, the extent of private land affected and the infrastructure distribution.

These inconsistencies undermine confidence in the application and make meaningful public understanding extremely difficult.

Residents and landowners have not been provided with sufficient information to understand whether infrastructure will cross their lands, what easement widths will exist, what access arrangements will be made and any possible long-term restrictions on land use.

Because the route remains “indicative,” affected individuals cannot fully understand how their homes, farms, or livelihoods may be impacted.

The application provides only broad assumptions such as construction progressing at approximately 100m per day. There is no detailed phasing plan, no location-specific construction schedule and no assessment of overlapping works.

This prevents residents from understanding the duration of disruption, traffic diversions, access restrictions, or potential impacts on emergency services.

The proposed route passes near sensitive peatlands, watercourses, recorded monuments, and protected structures. The application relies heavily on mitigation measures such as settlement ponds, peat excavation and reinstatement and archaeological monitoring. These measures depend entirely on perfect implementation, yet limited analysis is provided regarding risks should mitigation fail.

Without a fixed design, the level of environmental risk cannot be accurately assessed.

Meaningful community consultation on the grid route has not taken place.

In particular community clinic notices did not clearly reference the grid route, only limited mapping information was displayed, residents along the route received no direct engagement or information, consultants were unable to answer detailed questions and public notices were difficult to read.

Combined with incomplete project information, this has significantly limited the ability of residents to participate effectively in the planning process, contrary to the principles of the Aarhus Convention.

In summary the project is not fully defined, key mitigation measures remain uncertain, environmental impacts cannot be reliably assessed, affected residents cannot understand how they will be impacted and meaningful public participation has been compromised.

These issues go to the fundamental legality of the application rather than being minor technical matters.

As the wind farm and grid connection are interdependent, uncertainty surrounding the grid route also raises questions regarding the feasibility of the associated wind farm development.

For these reasons, I respectfully request that **An Coimisiún Pleanála refuse permission** for the proposed 25km 110kV grid connection from Cahermurphy to Moneypoint.

Yours faithfully



Patricia Collis

16/5/26.



Christopher Collis

16/5/26