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25th May 2026

An Coimisiún Pleanála
Strategic Infrastructure Division
64 Marlborough Street
Dublin 1, D01 V902

Subject: Formal Objection to Proposed 220kV Substation and Underground Grid Connection

Planning Reference: 324162 | Applicant: Bord Gáis Energy Ltd

Dear Members of An Coimisiún Pleanála,

My name is Andrew King. I operate a dairy farm at Knocknacreeva, Athenry, Co. Galway, under a 15-year lease. I milk a dairy herd from a parlour located approximately 720 metres from where the proposed substation will be built. More critically, the proposed 8.1km underground grid connection cable route runs directly along the public roads that provide the only access to my farm.

This farm depends on a private water well for the farm operations — drinking water for the herd, parlour washing, and daily hygiene. The well is located approximately 700 metres from the proposed substation site and lies directly within the karst limestone aquifer that underlies this entire area.

I am objecting to this grid connection application because the proposed works threaten the groundwater that supplies my well, will close or severely restrict the roads I depend on for up to 12 months, and have not been assessed for their impact on working dairy farms.

GROUNDWATER RISK FROM TRENCHING AND CONSTRUCTION IN KARST TERRAIN

The Karst Aquifer and My Water Supply

The applicant's own Foundation Note (included with the related peaker plant application PA07.324113) confirms that this site sits on "Regionally important Aquifer — Karstified (conduit)" with "Extreme to High vulnerability" groundwater classification. The bedrock underlying both the substation site and the entire 8.1km cable route is fractured limestone with underground drainage channels, fissures, and confirmed geophysical anomalies indicating air voids and clay-filled voids at shallow depth.

The Farm's private well draws from this same aquifer. In karst terrain, there is no protective soil layer filtering contaminants before they reach groundwater. Surface water — and anything dissolved in it — moves rapidly through cracks, fissures, and underground conduits directly into the aquifer. A pollution event anywhere upgradient of my well can reach the well water within hours or days, with no natural filtration and no warning.

Construction Phase Contamination Pathways

The proposed grid connection works involve:

- Excavating trenches 2m deep along 6,050 metres of public road
- Installing 10 joint bays, each 8.0m x 2.5m x 2m deep, within the road carriageway
- Horizontal directional drilling (HDD) operations at three motorway crossings, requiring launch and receptor pits with dewatering
- Temporary stockpiling of excavated material
- Concrete works for joint bay construction
- Use of oils, lubricants, hydraulic fluids in excavators and drilling equipment
- Possible encounters with culverts, drainage features, and fissured bedrock

The applicant's Construction Grid Connection Report (Vol 3, Appendix 2.7) acknowledges the need for dewatering during trenching works. That dewatered groundwater will be pumped out, temporarily held, and either discharged to surface drains or allowed to infiltrate back to ground. The Report does not specify water quality testing, treatment, or monitoring of dewatering discharges.

During 12 months of trenching and drilling across 8.1km of karst terrain, the following contamination risks are present:

Diesel and hydraulic oil spills from construction machinery operating in open trenches and drill pits

Cement and concrete washout water, which is highly alkaline (pH 12–13) and can severely degrade groundwater quality in karst systems where there is limited natural buffering

Sediment-laden runoff from excavated spoil heaps, trenches, and HDD drill mud, carrying suspended solids, metals, and other contaminants directly into fissures exposed during excavation

Drilling fluid losses during HDD operations — if drill fluid (bentonite slurry) is lost to karst voids during motorway crossings, it can migrate unpredictably through the aquifer

Hydrocarbon contamination from refueling, equipment maintenance, and accidental spills in close proximity to open excavations

The Construction Grid Connection Report does not provide:

- A site-specific karst groundwater protection plan
- Monitoring of private wells within 1km of the cable route during construction

- Baseline water quality testing of private wells before works commence
- Emergency response procedures for a groundwater contamination event
- Contingency measures if construction encounters karst voids, fissures, or active drainage features

For a working dairy farm using a private well 700 metres from the construction site and directly downgradient of the cable route trenching works, this is an unacceptable level of uncertainty.

No Assessment of Private Wells

The application documents do not identify, map, or assess the risk to private water wells along the 8.1km cable route. I have not been contacted by the applicant or their consultants. I have received no notification that trenching works will take place within 700 metres of my sole water supply. There has been no offer of baseline water testing, monitoring, or contingency water supply.

If construction activities contaminate my well, I have no backup. The farm cannot operate without water. My herd cannot drink contaminated water. My milk quality will be affected. Under food safety regulations, I am responsible for ensuring the water used in milk production meets safety standards. A contaminated well puts my entire operation at risk, and the planning application does not address this.

I formally request that An Coimisiún Pleanála require the applicant to:

1. Identify and map all private water wells within 1km of the cable route and substation site
2. Conduct baseline water quality testing of all identified wells before any works commence
3. Provide continuous groundwater monitoring during construction
4. Provide an emergency alternative water supply to affected farms if contamination occurs
5. Commit to remediation and compensation if well contamination is proven to result from construction activities

Without these measures, the application should be refused on the grounds that it poses an unacceptable and unmitigated risk to private water supplies serving active agricultural operations.

ROAD CLOSURES AND ACCESS DISRUPTION - INCOMPATIBLE WITH DAIRY FARMING

The Milk Collection Requirement

I need An Coimisiún Pleanála to understand what road closure means for a working dairy farm.

Milk is collected from Knocknacreeva Farm every one to two days without exception, 365 days a year. This is not a service I can reschedule, delay, or divert to suit construction works. If a milk tanker cannot reach my farm on collection day because of road works, road closure, or an impassable diversion route, the milk in my bulk tank is lost. That milk cannot be sold. Under my supply contract, I am responsible for presenting milk for collection in merchantable condition. Repeated failures to do so carry financial penalties and can jeopardise the contract itself.

The applicant's Construction Grid Connection Report (Vol 3, Appendix 2.7) proposes:

- Stop/Go traffic management where road widths allow a minimum 2.5m clearance
- Full road closures with diversions where 2.5m clearance cannot be maintained
- Works duration of approximately 12 months
- Trenching operations along 6,050 metres of public road

The roads serving Knocknacreeva Farm are narrow rural roads. An 8km diversion adding 5km to every journey — as was proposed for the L7108 in the related peaker plant application — is not a minor inconvenience for a 32-tonne milk tanker. It increases fuel costs, increases collection time, increases wear on narrow roads not designed for heavy vehicles, and introduces additional risk of mechanical breakdown or road traffic accidents on unfamiliar routes.

More critically, **a milk tanker on a diversion route may encounter roads with weight restrictions, low bridges, narrow bends, or poor surface conditions that make collection impossible**. If the diversion route is not suitable for a 32-tonne articulated tanker, my milk cannot be collected. The planning application provides no assessment of diversion route suitability for agricultural heavy goods vehicles.

The Emergency Access Requirement

Dairy farming operates 24 hours a day, 365 days a year. Emergencies do not wait for road works to finish.

If my bulk milk tank refrigeration system fails — for any reason — an emergency refrigeration engineer must be able to reach the farm immediately, day or night. The bulk

tank must maintain milk at 4°C or below at all times. If the temperature rises above safe limits, the entire tank of milk is condemned. A road closure or an impassable diversion route that delays an emergency repair by even a few hours can result in the loss of two or three days' production. That is a direct financial loss for which I bear full responsibility under food safety law.

A veterinary surgeon must be able to reach this farm at any hour. Dairy cows calve around the clock. Difficult calvings, prolapsed uteruses, milk fever, displaced abomasums, and acute lameness emergencies require immediate veterinary intervention. In obstetric emergencies, delays of 20 to 30 minutes can be the difference between saving and losing a cow and calf. Animal welfare legislation places positive obligations on me to ensure my animals receive timely veterinary care. A road closure that prevents a vet from reaching the farm in a timely manner is not just an inconvenience — it is a breach of my legal duty of care to my animals.

The Construction Grid Connection Report makes no provision for guaranteed 24-hour emergency access for agricultural vehicles. The traffic management proposals are generic. They do not address the specific access requirements of working farms that cannot shut down, reschedule, or delay critical operations to suit construction timetables.

Feed Deliveries, Contractors, and Routine Farm Operations

A dairy farm requires regular deliveries of cattle feed (concentrates, silage additives, minerals), veterinary supplies, and farm consumables. AI technicians, hoof trimmers, milk recording technicians, and machinery contractors all require access to the farm on scheduled days. A 12-month period of road closures and diversions will disrupt every one of these operations.

Feed suppliers working to tight delivery schedules may refuse to service farms on diversion routes. Contractors may impose surcharges for additional travel time. Scheduled services — such as hoof trimming, which is a legal requirement for dairy cow welfare — may be delayed or cancelled if access is difficult. The cumulative effect of 12 months of access disruption is not assessed anywhere in the planning application.

I formally object to any road closure or traffic management regime that does not guarantee:

- Uninterrupted access for milk collection tankers (32 tonnes gross vehicle weight) on collection days
- 24-hour emergency access for refrigeration engineers and veterinary surgeons
- Scheduled access for feed deliveries, AI services, hoof trimming, and farm contractors
- Pre-agreed alternative routes that are certified as suitable for 32-tonne articulated vehicles

- A formal communication system to notify farms in advance of any planned road closures with at least 7 days' notice

Without these guarantees, the proposed grid connection works are fundamentally incompatible with the operational requirements of a working dairy farm, and the application should be refused on that basis.

CUMULATIVE IMPACT WITH THE PEAKER PLANT APPLICATION

This grid connection application (VA07.324162) exists solely to serve the proposed Cashla Peaker Plant (PA07.324113). The two applications are inseparable.

If both applications are approved, construction of the peaker plant and the grid connection will occur concurrently or in immediate succession. The peaker plant application involves delivery of a 360-tonne gas turbine, a 380-tonne generator, and a 288-tonne transformer along the same local road network that will be disrupted by grid connection trenching works.

The cumulative impact of both construction programmes on farm access has not been assessed. I may face:

- 12 months of grid connection trenching and road closures
- Followed by or overlapping with abnormal load deliveries for the peaker plant
- Followed by operational traffic serving a COMAH-classified industrial facility 720 metres from my farm

This is a fundamental alteration of the transport and access conditions under which I am farming this land. The planning system should require a full assessment of cumulative transport impacts before either application is approved. That assessment has not been provided.

WHAT I AM ASKING FOR

I formally and respectfully request that An Coimisiún Pleanála **refuse planning permission** for the proposed 220kV substation and grid connection infrastructure (VA07.324162) on the following grounds:

Groundwater Risk:
The proposed trenching, drilling, and construction works pose a direct and unassessed risk to private water wells drawing from the karst limestone aquifer, including the well that is the sole water supply for Knocknacreeva Farm. No baseline testing, monitoring, or contingency measures for well protection have been provided.

Road Access:
The proposed road closures and traffic management regime are incompatible with the

operational requirements of a working dairy farm, which requires guaranteed access for milk collection (every 1-2 days), emergency refrigeration and veterinary services (24 hours), and routine farm operations (feed, contractors, AI services). No assessment of impact on agricultural operations has been provided.

Cumulative Impact:
The cumulative transport impact of this grid connection (12 months of trenching) and the related peaker plant (abnormal loads, ongoing operational traffic) has not been assessed. The two applications must be considered together.

I also formally request the following conditions if, contrary to my objection, permission is granted:

1. Mandatory baseline water quality testing and ongoing monitoring of all private wells within 1km of the cable route, with emergency alternative water supply and compensation provisions

2. Guaranteed 24-hour access for milk tankers, veterinary services, and emergency farm contractors throughout the construction period

3. Minimum 7 days' advance notice of any planned road closures to affected farms

4. Certification that all diversion routes are suitable for 32-tonne articulated vehicles

5. Completion of a detailed Traffic and Transport Assessment and Road Safety Audit before any works commence

I reserve the right to make further submissions and to be represented at any oral hearing.

Yours sincerely,

Andrew King
Knocknacreeva Farm
Athenry, Co. Galway

25th May 2026

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