

Brendan and Deirdre Kelly,
Castlelambert,
Athenry,
Galway.
H65KT91
Deirdrekelly24@gmail.com
0858002024

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An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Re: Third-Party Observation & Objection – Case Ref. 324162

Proposed Development: Installation of High-Voltage Underground Cable along the Castlelambert Road, connecting Cashla Peaker Plant to Cashla substation.

A Chara,

I am a resident of the Castlelambert Road in Athenry and write to formally register my objection to the above-referenced application, which proposes the installation of a high-voltage underground electricity cable running along the middle of the public road on which I reside. I have a direct and material interest in this application by virtue of my property's location on the route of the proposed cable.

I respectfully request that the following concerns be given full consideration by An Coimisiún Pleanála prior to any determination being made. These concerns relate to traffic and road disruption, the impact on future planning permissions for neighbouring properties, public health and electromagnetic fields (EMF), the duration and nature of construction works, potential disruption to the local water table and drainage, and the impact on biodiversity along the road corridor.

1. Traffic Disruption and Road Safety

The installation of a high-voltage underground cable along the centre of the Castlelambert Road will require prolonged and extensive open-cut trenching or other excavation works along the full length of the cable route. This gives rise to serious concerns regarding traffic management and road safety:

- The road will require partial or full closure for extended periods during cable laying, joint installation, and reinstatement works. No satisfactory Traffic Management Plan has been submitted that adequately demonstrates how road closures, diversions, and access to properties will be managed during this time.
- The Castlelambert Road serves as an important through-route / access road for many residential properties. Any prolonged disruption to traffic flow will cause significant inconvenience and may delay access for emergency vehicles, including ambulances and fire appliances.
- This Road is one of the main route and access to our local National School in Lisheenkyle. It has a large number of pupils with many people attending locally and also from the greater regions in Athenry town and surrounding areas. This road closure has the potential to disrupt many children's daily routines and thus interfere with their school lives and education.
- Heavy plant and machinery — including cable-laying equipment, excavators, spoil lorries, and cable drum transporters — will generate significant HGV movements on a road that is not designed for such loads. No Abnormal Load assessment or Road Condition Survey has been submitted to establish a baseline against which post-construction reinstatement can be judged.
- The routing of the cable along the centre of the carriageway, rather than along the verge or footpath, is unnecessary and maximises disruption. No justification has been provided for this routing decision, and no alternative route options have been presented for public scrutiny.

I request that the Board condition any permission upon the submission and agreement of a detailed Construction Traffic Management Plan (CTMP) with the relevant roads authority, and that a pre-construction road condition survey be carried out and made publicly available.

2. Impact on Future Planning Permission for Neighbouring Properties

The installation of permanent high-voltage infrastructure along the Castlelambert Road will have serious and long-lasting consequences for the planning rights of residents' families — consequences that directly compound Ireland's existing housing crisis. My concern centres specifically on the ability of the next generation — our children — to obtain planning permission for homes on or adjacent to family-owned lands along this road.

- No planning or social impact assessment has been submitted that addresses the effect of this development on future residential planning applications along the route. This is a material omission that the Board should require to be remedied before any determination is made.

- The routing of the cable along the centre of a residential road — rather than along an industrial corridor, a field boundary, or an alternative alignment — imposes this burden on an established residential community that had no role in siting the peaker plant or the substation it serves. The community is, in effect, being asked to sacrifice the housing futures of its children for energy infrastructure that benefits a wider population.
- Young people from families on the Castlambert Road who might otherwise have been granted permission to build on family land — consistent with established rural housing policy — will instead be forced into an already over-stretched private rental market or onto social housing waiting lists. The applicant has made no assessment whatsoever of this social impact, and no mitigation has been proposed.
- Ireland is in the midst of a severe housing crisis. Government policy at national, regional, and local level explicitly supports the provision of rural housing for the children of established rural families, as reflected in the Rural Housing Guidelines and most County Development Plans. The installation of this infrastructure in the centre of a residential road will directly undermine that policy objective for every family residing along the cable route.
- The presence of a high-voltage cable creates a permanent statutory wayleave or easement corridor along the road. Planning authorities and An Coimisiún Pleanála itself routinely refuse or restrict residential planning applications within defined proximity to high-voltage infrastructure on grounds of public safety and EMF exposure. Families along the Castlambert Road who had hoped to provide sites for their children on their land will now face this barrier, potentially permanently.

I urge the Board to recognise that the harm caused by this development is not merely temporary construction inconvenience, but a permanent constraint on the housing prospects of the next generation of this community. This is a weighty consideration that the applicant has entirely failed to address, and which weighs heavily against the granting of permission along this particular route.

3. Public Health Concerns: Electromagnetic Fields (EMF)

High-voltage underground cables generate electromagnetic fields (EMF). While the applicant may point to ICNIRP reference levels, I wish to place the following concerns on the record:

- No independent EMF assessment has been submitted that specifically models the field strengths at ground level and at the facades of the nearest residential properties along the Castlambert Road for the proposed cable operating at full load capacity.
- Residents, including families with young children, live and sleep in close proximity to the proposed cable route. There is ongoing scientific debate regarding the potential long-term health effects of chronic low-level EMF exposure, particularly in relation to childhood leukaemia, as noted in reviews by the World Health Organisation and the International Agency for Research on Cancer (IARC), which classifies extremely low-frequency magnetic fields as a Group 2B possible human carcinogen.

- The cable will connect a peaker plant — a facility that operates intermittently at high load — to a substation. Load variation and demand surges will result in fluctuating EMF levels. No assessment of peak-load EMF exposure has been provided.
- Construction-phase health risks include dust, noise, and vibration from trenching works adjacent to residential properties.

I call on the Board to require an independent, peer-reviewed EMF assessment modelling worst-case operating conditions, and to make the results publicly available before any decision is made.

4. Duration and Nature of Construction Disruption

The installation of a high-voltage underground cable is a technically complex and prolonged undertaking. Residents of the Castlelambert Road face an extended period of construction disruption, the full impacts of which have not been adequately addressed in the application:

- Trenching, cable-pulling, and jointing operations are labour-intensive and time-consuming. The application does not provide a realistic and binding construction programme that residents can rely upon.
- Cable jointing bays — which involve significant excavation and extended periods of open trench — will be required at intervals along the route. The locations of these bays have not been clearly identified, and the extended works associated with each bay will cause localised but severe disruption.
- Noise and vibration from saw-cutting, breaking, and compaction of the road surface will impact residents throughout the works. No noise or vibration monitoring regime has been proposed.
- Access to individual properties, including for deliveries, bin collections, and emergency services, must be maintained at all times. The application provides insufficient detail on how this will be achieved.
- Road reinstatement quality is a key concern. Open-cut trenching frequently results in poorly reinstated road surfaces that subside over time, creating hazards for cyclists and pedestrians. The applicant should be required to provide a bond or financial guarantee against the cost of full carriageway reinstatement.

I request that the Board impose conditions specifying a maximum construction programme duration, binding working hours, a noise and vibration monitoring scheme, and a financial bond for road reinstatement.

5. Disruption to the Water Table and Local Drainage

The excavation of a deep trench along the length of the Castlelambert Road carries significant risks for the local water table, groundwater flows, and existing drainage infrastructure:

- Deep trenching can intercept and redirect sub-surface water flows, potentially causing groundwater to migrate toward the foundations of adjoining properties or to be cut off from areas that currently benefit from natural sub-surface drainage.
- The area is known to experience periodic surface water flooding making this risk particularly acute.
- Existing buried services along the road, including foul sewer, surface water drainage, water mains, and telecoms ducting, may be damaged or displaced during excavation. The application does not demonstrate adequate service location surveys have been carried out.
- The cable trench itself, if inadequately backfilled and sealed, can act as a preferential pathway for groundwater movement, potentially directing water toward or away from areas in an uncontrolled manner.
- No hydrogeological assessment has been submitted with the application, despite the potential for significant interference with local groundwater conditions.

I request that the Board require the submission of a hydrogeological assessment and a utilities survey, and that conditions be imposed requiring the trench to be backfilled and sealed to a specification agreed with Irish Water and the relevant local authority.

6. Biodiversity and Local Nature

Although the cable is proposed to be installed underground, the construction works along the Castlelambert Road will have consequences for the ecological value of the road corridor:

- The road verges, hedgerows, and boundary vegetation along the Castlelambert Road provide habitat connectivity and support a range of protected and non-protected species. Trenching works and associated vehicle movements will damage or destroy this vegetation, potentially during the bird nesting season (February–August).
- No Ecological Impact Assessment (EclA) has been submitted with the application. Given the length of the cable route, the linear nature of the works, and the ecological value of road-corridor habitats, this is a significant omission.
- Hedgerows along the route may be protected under the Wildlife Acts 1976–2012. The applicant has not confirmed whether any hedgerow removal is required or whether a derogation licence has been or will be sought.
- The road corridor may support foraging and commuting bats, which are European Protected Species under the Habitats Directive and the Wildlife Acts. No bat survey has been carried out at appropriate seasons.
- Spoil from the trench excavation must be disposed of appropriately and must not be deposited in ecologically sensitive areas. No spoil management plan has been provided.

I call on the Board to require a full Ecological Impact Assessment, confirmation of compliance with the Wildlife Acts regarding hedgerow protection, and a Construction Environmental Management Plan (CEMP) that addresses vegetation clearance, bird nesting, protected species, and spoil disposal.

Conclusion

The installation of a high-voltage underground cable along the Castlelambert Road is a significant and long-lasting piece of infrastructure that will have material and enduring consequences for the residents of this road and the local environment. The concerns I have set out above are, in my submission, material planning considerations that have not been adequately addressed in the documentation submitted by the applicant.

I respectfully urge An Coimisiún Pleanála to:

- Require the applicant to submit the additional assessments identified above (Traffic Management Plan, EMF Assessment, Hydrological Assessment, Ecological Impact Assessment) before proceeding to a determination;
- Consider whether an Oral Hearing should be convened to allow affected residents to address the Board directly; and
- In the event that permission is granted, impose robust and enforceable conditions to protect the rights, health, and amenity of residents along the cable route.

I am available to provide further information or evidence in support of this submission and would welcome the opportunity to address the Board at any Oral Hearing.

Is mise le meas,

Brendan and Deirdre Kelly

Resident of the Castlelambert Road

Date: 25 May 2026