

Planning reference number: ABP-324162 Cashla Peaker Plant Grid Connection.

An Comisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Hugh Kelly

Ederney House,

Lisheenkyle,

Athenry,

Co. Galway,

H65TY82

24th May 2026

Introduction:

I wish to lodge a submission to the routing of the grid connection of the above application as outlined below.

(I) Deficiency in EIAR:

Article 3 of the EIA directive as amended, states that an “environmental impact assessment shall identify, describe and assess in an appropriate manner in the light of each individual case, the direct and indirect significant effects of a project on the following factors. (a) Population and human health, (b) biodiversity, with particular attention to species and habitats protected under directive 92/43/EEC and directive 2009/147EC. (c) Land, soil, air, and climate, (d) Material assets, cultural heritage and the landscape. (e) The interaction between factors referred to in (a)-(d). Under section d, the preparation of this EIAR was to scope the possible impacts of the proposed development, to identify potentially significant impacts.

However it is my contention that there has been a failure in the assessment , of the true impact of the grid connection construction. These failures include:

- (1) Insufficient investigation and assessment of possible root spread in the substrata of the farmer beneath the public road, with use of none invasive methods, such as the use of ground penetrating radar.
- (2) Insufficient assessment of how the release of materials that are toxic to plants, such as the addition of concrete for armouring the ducts and the effects on the roots due to the PH level changes.
- (3) Insufficient assessment of how the possible future death of trees and hence the required removal, may impact noise levels, on local residential properties adjacent to the farm.

- (4) Insufficient assessment of the potential loss of amenity value, due to possible removal of trees.
- (5) No Criteria used by Arboritists to assess the value of tree loss in regards to noise abatements, loss of privacy and loss of shelter for livestock.
- (6) How the possible physical severance of roots may destabilise the trees. (Root removal is on the windward side of the trees and hence will rob the tree of its anchor support against the wind.)
- (7) Insufficient assessment of how the possible stressing or ultimate killing of the trees from parasitic infections may occur due to damaged root systems, or roots in contact with caustic concrete.
- (8) No assessment on how the effects of the removal of the shelter belt (trees), will have on farm structures from the increased velocity of the wind, during storms with the shelter belt gone.
- (9) No system in place if trees do die in the next 10 years, as a mature tree can take that long to succumb to its injuries.

(II) Impact on Domestic services:

- (1) Where grid connection will impact household water connection, the household requires no interference with pipe work without prior approval of householder.
- (2) Where requested by homeowners, any water crossings that are encountered during the cable laying process will be ducted into 6 inch ducts, to allow for easier leak detection as the electrical cable will present an additional hazard for repair, post construction.
- (3) Bord Gais to pay the cost of a qualified engineer on behalf of the domestic householder, to verify that any pipe work that may be altered or damaged during the pipe laying construction will be repaired, replaced to the satisfaction of the householder.

(III) Construction effects on private property.

- (1) A pre-construction survey is required for all private pull-in areas adjacent to narrow local roads as without the use of these areas, construction traffic on the narrow roads will not be able to pass. It should be a condition that before any construction takes place, in the vicinity of existing houses, buildings, which may be impacted by the cable construction and road re-instatement, a competent and independent expert should be appointed with the consent of the local authority who will prepare a written and photographic record of their condition. This survey will include, pull in conditions as a record, in case of potential damage from construction traffic. Vibration monitoring will also be required where rock breaking may occur during cable joint constructions.

(IV) Milk Collections.

- (1) Bord Gais to liaise with ArraTipp Co-Op to facilitate milk collections.

(V) Land Owner Consent

- (1) Recent high court rulings have affirmed the landowners right to ownership of the substrata to the centre of the road, as listed on his folio. The landowner

contends that his tree roots already utilised the substrata and there is no room on his folio for the cable without causing damage to his property(trees), and he has not consented for the cable to pass through. This will lead to a devaluation of his property.









Conclusion:

I feel that this EIAR assessment is deficient and has failed to discover the effects that this project will impact on my property as detailed above. I hope that An Bord Pleanála will fully assess the effects that this grid may potentially have on my business.

Hugh Kelly