

**LCDPM Community Alert
&
LCDPM Defibrillator (Defib) Group**

FORMAL STRATEGIC INFRASTRUCTURE DEVELOPMENT SUBMISSION

To:

The Secretary,
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902.

LCDPM Community alert
& LCDPM Defib Group
Lisheenkyle
Oranmore
Co. Galway

Date: 25/05/2026

RE: Planning Application Reference: VA07.324162

Development Description: Proposed 220kV Substation, 36-metre Telecommunications Mast, 220kV underground electricity cabling infrastructure, and associated grid connection works.

Corridor Geographic Focus: Commencing at Moanbaun (originating at Coffey Construction Headquarters), traversing the L7109, L7108, and L3103 Local Road networks, terminating at Cashla 220kV Substation, Athenry, Co. Galway.

Fee Enclosed: Statutory fee of €50.

Dear Sir/Madam,

This joint statutory submission is submitted on behalf of the **LCDPM Community Alert Group** and the **LCDPM Defib Group** (jointly representing the residents, rural households, and community interests of all residents of the proposed areas of the aforementioned project).

While our respective groups recognise the strategic national importance of electrical grid upgrades to support renewable energy accommodation, we raise serious, unmitigated local concerns regarding the direct impacts of the proposed 220kV substation, the 36-metre telecommunications tower, and the underground cable path.

Because this linear construction corridor passes directly outside the entrance gates of numerous local homes along highly constrained rural roads, and introduces a massive

industrial tower into a flat landscape, we request that the Board imposes strict, legally binding conditions on the applicant to preserve community safety, lifeline emergency medical response times, utility integrity, landscape heritage, and rural security. Our specific grounds for observation, backed by requested planning conditions, are detailed below:

1. Emergency Medical First Response & Lifeline Defibrillator (AED) Access

The LCDPM Defib Group operates a vital, volunteer-led emergency first-responder network where immediate, unhindered transit is critical during cardiac events.

- **Direct Residential Entrances Blocked:** The proposed 220kV cable route runs directly past the boundary walls and primary entrance gates of numerous private residential homes. During trenching, heavy excavation, and high-voltage cable-pulling phases, residents face immediate physical lockout from their driveways.
- **Life-Threatening Delay Risks:** In a medical emergency, a local volunteer responder carrying a defibrillator, or a National Ambulance Service vehicle, will be physically blocked from driving up to a patient's front door due to open trenches and heavy plant machinery. Delays waiting for machinery to move or plates to be laid could prove fatal.
- **Threat to Lifesaving Infrastructure:** Several localised grid-connected AED kiosks are positioned along this corridor network. Roadworks must not disconnect electricity to this equipment or obstruct public access to them.
- **Demanded Planning Conditions:**
 1. The Board must condition that **no residential driveway entrance may be blocked for more than 30 consecutive minutes** without a pre-agreed, individualised resident escort plan.
 2. Heavy-duty steel trench plating must be staged on-site directly outside every single home to allow instant, manual bridging for emergency vehicles.
 3. The developer must establish a mandatory, ring-fenced **Emergency Access Protocol**, ensuring construction crews instantly clear priority road space for emergency vehicles and local first-responders upon notification.

2. Traffic Chaos, Entrapment, and Structural Realities of Minor Local Roads

The construction corridor relies entirely on a restrictive local road sequence moving from Coffey Construction down to Cashla, specifically the **L7109, L7108, and L3103 local roads**, including minor **L71093 feeder cul-de-sacs**.

- **Inadequacy of the Minor Network:** These local roads are highly restricted in width, feature multiple tight blind bends, are bordered by traditional stone walls, and completely lack public footpaths or hard shoulders.
- **Complete Entrapment Risk:** Because the route runs sequentially from Moanbaun down to Cashla, any active trenching or heavy machinery laydown on the L7109,

L7108, or L3103 will effectively cut the local road network in half. Residents living along these specific lanes will have zero alternative escape routes, leaving them trapped in their homes during active civil works.

- **Structural Ruin of Road Foundations:** These minor routes were never structurally engineered to withstand continuous cycles of maximum-tonnage HGVs carrying heavy electrical substation transformers, 36m mast infrastructure pieces, cable drums, and continuous concrete aggregate. Allowing unmitigated traffic will result in structural road foundation failure, severe rutting, and hazardous potholing directly outside residential gates.

- **Demanded Planning Conditions:**

1. The Board must condition a strict **Traffic Phasing and Single-Lane Shuttle Protocol** utilising actively manned stop-go systems (not passive, unmonitored traffic lights) to ensure residential access is prioritised.
2. HGV movements must strictly bypass minor residential school-bus paths during peak morning and afternoon hours.
3. A legally binding **Road Restoration Bond** must be paid to Galway County Council by the applicant to fully resurface the entirety of the L7109, L7108, and L3103 upon construction completion. **Disruption to Post-Primary School Transport Networks:** The L7109, L7108, and L3103 road network serves as a critical daily transit corridor for secondary school buses [5]. Dozens of local students rely on these specific roads every morning and evening to travel to post-primary schools in Athenry (such as **Presentation College Athenry** and **Clarín College**), as well as schools in Tuam and Galway City.

3. Safety Hazards at Vulnerable Pick-Up Points: These narrow roads lack public footpaths or street lighting. Students must stand on narrow grass verges or directly on the roadside at designated collection points. Introducing deep trenching, heavy excavation plant machinery, blind road diversions, and high-frequency HGV movements directly outside these residential gates creates an unacceptable and severe safety hazard for children boarding or exiting school buses .

Unacceptable Delays to Education Timetables: Any unmitigated road closures or slow-moving construction convoys between Moanbaun and Cashla will cause immediate, severe delays to bus schedules. This risks leaving students stranded on rural roadsides or making them late for morning classes.

Demanded Planning Conditions:

1. An absolute ban must be enforced on all HGV haulage movements and active road-trenching operations along the L7109, L7108, and L3103 during peak school bus transit hours (**07:30 to 09:15** and **15:15 to 16:45, Monday to Friday**).

2. The applicant must consult directly with **Bus Éireann's School Transport Division** and local private bus operators to map every active student pick-up point along the route before a single piece of machinery is deployed.
3. A mandatory, clear pathway must be physically maintained at all times for school transport vehicles, with dedicated banksmen deployed at construction zones to manually guide buses safely past any active works.

4. Protection of Domestic Water Infrastructure & Group Water Schemes

- **Presence of Shallow Assets:** The minor roads running from the Coffey Construction headquarters down to Cashla Substation house essential subterranean water main infrastructure. Many of these older pipelines, including assets managed by Uisce Éireann and local private Group Water Schemes, are laid at shallow depths beneath the narrow road verges and carriage margins.
- **Catastrophic Service Interruption Risk:** Heavy mechanical excavation, pneumatic rock-breaking, and directional drilling directly alongside these fragile water mains present an immediate risk of pipe fractures, pressure blowouts, and severe sediment contamination. Any disruption will instantly leave hundreds of local homes without drinking water or sanitation.
- **Demanded Planning Conditions:**
 1. The applicant must complete **ground-penetrating radar (GPR) utility mapping** and physical slit-trenching before any heavy plant machinery is deployed on the L7109, L7108, or L3103.
 2. The developer must secure a formal asset-protection agreement with both Uisce Éireann and the administrators of any local Group Water Scheme before commencement.
 3. A mandatory **Water Supply Contingency Plan** must be legally bound. If a water main is breached, the developer must deploy static clean-water tankers to all affected homes within 4 hours.

5. Destruction of Historic Drystone Walls & Field Boundaries

- **Direct Threat to Local Vernacular Heritage:** The minor road network traversing Moanbaun, Castlelambert, and Lisheenkyle is defined by traditional, centuries-old drystone walls. These walls dictate the rural character of the Athenry landscape, provide structural stability to rising residential lawns, and act as critical wildlife corridors.
- **Irreversible Physical Damage:** The physical width required to excavate a 220kV high-voltage trench corridor, alongside high-tonnage construction vehicle passings, makes the collapse or deliberate removal of these stone road boundaries highly probable.

Machine operators pulling wide cable drums around the tight bends of these lanes will inevitably strike and destabilise these structures.

- **Demanded Planning Conditions:**

1. An absolute prohibition must be placed on the permanent removal of any traditional drystone walling along the route corridor.
2. The applicant must fund an independent **Pre-Construction Photographic Asset Register** documenting every single meter of stone walling fronting the local residential roads.
3. Where any boundary wall is dismantled or accidentally structurally compromised, the developer must be legally mandated to employ specialist stone-masons to rebuild the wall **like-for-like** using traditional dry-mix methods and local limestone before the grid infrastructure is commissioned.

6. Visual Blight & Proximity of the 36m Telecommunications Mast

- **Massive Industrial Scale Incompatible with Rural Setting:** The inclusion of a 36-metre telecommunications lattice mast represents an unacceptable industrialisation of a low-density, rural landscape. A structure of this immense height (approximately 118 feet) will serve as an aggressive visual blight, dominating the skyline and drastically altering the scenic character of the surrounding town lands.
- **Direct Devaluation of Family Homes:** Because this high-voltage substation site sits directly adjacent to long-established family homesteads, the towering mast will be completely visible from the front windows, gardens, and living spaces of nearby properties. It represents an obtrusive piece of utility infrastructure that severely downgrades local residential amenity.

- **Demanded Planning Conditions:**

1. The applicant must be mandated to submit a **Comprehensive Visual Impact Assessment (VIA)** from the exact coordinates of every single residential home located within a 1km radius of the site.
2. The Board should condition a reduction in the height of the mast or demand a **monopole "stealth" design** dressed as a natural feature, rather than a harsh, industrial lattice configuration.
3. A legally binding **Landscape Mitigation Scheme** must be fully funded by the applicant, requiring the planting of immediate, semi-mature native woodland screening along the perimeter boundaries to block the view from neighbouring houses.

7. Signal Interference with Community Alert Networks & Security Concerns

- **Disruption to Community Alert Communication Networks:** The LCDPM Community Alert Group relies heavily on clear, unobstructed cellular and localised radio frequencies to distribute safety alerts, emergency coordination messages, and monitor senior citizen medical panic buttons. Introducing a massive 36-metre utility communication tower directly alongside a high-voltage 220kV substation creates a severe risk of localised frequency interference and signal dropping.
- **Security Vulnerabilities During Construction:** A structural footprint of this scale requires specialised crane operations and high-altitude assembly. The influx of high-elevation equipment introduces unwanted lines of sight directly into the private properties, yards, and driveways of local residents, completely undermining community privacy and rural security.
- **Demanded Planning Conditions:**
 1. A mandatory **Independent Telecommunications and Signal Interference Audit** must be completed by the applicant pre- and post-commissioning to guarantee zero degradation to local cellular networks, emergency channels, or panic button frequencies.
 2. An absolute ban must be enforced on any construction-related aerial drone surveillance or high-elevation site cameras pointing toward or recording adjacent private residential properties.

8. Environmental, Structural, and Household Safety (EMF and Vibration)

- **Severe Structural Vibration Risks:** Because the high-voltage route passes directly outside residential front boundaries, heavy rock-breaking, tarmac sawing, and continuous HGV movements will cause significant ground-borne vibration. This poses an immediate structural risk (subsidence, plaster cracking, boundary wall collapse) to older, established rural properties lacking modern deep foundations.
- **Community Anxiety regarding EMF:** The proximity of a high-voltage 220kV substation and high-capacity lines near local properties raises significant, unaddressed community anxiety regarding Electromagnetic Fields (EMF).
- **Demanded Planning Conditions:**
 1. The applicant must be legally mandated to fund and conduct **Independent Pre-Construction Structural Surveys** for every residential home located within 50 meters of the cable route.
 2. Vibration monitoring sensors must be installed on boundary walls during active construction, with a clause to halt works instantly if safe thresholds are breached.

3. Construction hours directly outside residential gates must be strictly limited to between 08:00 and 17:30 Monday to Friday only, with an absolute ban on weekend works in high-density residential clusters.
4. The developer must deliver verified independent baseline and post-commissioning EMF monitoring data to residents to ensure safety thresholds are permanently maintained.

Conclusion

The LCDPM Community Alert Group and Defib Group request that An Coimisiún Pleanála thoroughly reviews these localised community safety aspects. We ask that our groups and all residents be kept fully informed of any further information requests, site inspections, or the final decision regarding case reference **VA07.324162**.

Yours faithfully,

Gearoidín Ní Bhraonáin

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(runaí) LCDPM Community Alert

On behalf of LCDPM Community Alert Group
& LCDPM Defibrillator (Defib) Group