

**Martin and Threasa Ruane
Castlelambert
Athenry
Galway
H65PW40**

ACP Reference: 324162

**An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902
Date: 20 May 2026**

Re: Observation on a Planning Application made under Section 182A of the Planning and Development Act 2000 (as amended) (Case Reference: 324162) for the development of a 220kV substation, telecommunications mast and underground electricity cable infrastructure with associated works

Dear Sir/Madam,

We, Martin and Threasa Ruane of Castlelambert, Athenry, Galway, H65PW40, are making the below submission on the proposed development lodged to An Coimisiún Pleanála under Reference 324162 for electricity infrastructure. The proposed development, as per the public notices, includes a 220kV substation, telecommunications mast and underground electricity cable infrastructure to accommodate the Cashla peaker plant which is the subject of a separate Strategic Infrastructure Development application to An Coimisiún Pleanála (Ref. ACP-324113-26).

As lifelong residents of Castlelambert with strong connections to the area, we wish to express a number of concerns arising from the proposed development. These concerns are set out under the following headings:

- Project Communication
- Impact on Rural Road Network
- Landscape Character and Value
- Climate Policy
- Health and Wellbeing

Project Communication around Traffic Management

While it is recognised a Stakeholder Engagement Report accompanies the planning application, there is serious doubt regarding the adequacy of some of the public engagement around the proposed development. The public consultation associated with this project was tokenistic in nature and the proposed development did not evolve following legitimate concerns raised by the public. The leaflet relating to the grid connection route (Appendix K) of the Stakeholder Engagement Report is lacking any detail and does not state that a full road closure will be in place for 5 months. The omission of such information appears a strategic move by the Applicant so as to avoid flagging the issue with local residents and enabling actual engagement. The leaflet states '*some short-term disruption to local road users may occur*'. However, 5 months is not short-term, it almost half a year

of disruption to the logistics of daily life. This road network is vital as a means of farming, carrying our business, commuting to school and work and as a means of recreation for local people with no access to green space unless travel by car is involved. The lack of clear and transparent information on the extent of the road impacts to homeowners in the vicinity is unacceptable.

In addition, no clear information appears to have been provided regarding issues including noise, vibration, road closures, rock-breaking, groundwater impacts or future maintenance requirements. There is a clear negative impact on the residential amenity of the surrounding area and the lack of engagement and consultation on such issues has been insufficient, despite the public consultation events outlined in the planning application, which were tokenistic at best.

Impact on Rural Road Network

The proposed 8.1km underground cable route runs through a number of rural townlands with established residential dwellings and important farmland. The existing road network is rural in nature with the L7108 and L7109 being particularly narrow with the need to utilise the setback space associated with the existing houses for oncoming vehicles. The closure of the road network will create serious disruption in rural Galway. Within the Galway County Development Plan 2022-2028, there is a focus on the continued protection and preservation of the countryside. It is specifically stated that the *'open countryside is and will continue to be, a living and lived-in landscape focusing on the requirements of rural economies and rural communities, based on agriculture, forestry, tourism and rural enterprise.'* The proposed development will undoubtedly severely adversely affect all of these areas, particularly agriculture which is a key economic activity in the local area.

It is also worth highlighting that these works will negatively impact emergency vehicles, home-support services and school transport. Of particular concern is access to community defibrillators which are located along the proposed cable route. Continued and uninhibited access to defibrillators is often critical in emergency response assistance in rural areas.

The roads surrounding Lisheenkyle National School are already heavily used by local traffic, school transport and agricultural vehicles. These roads are narrow, have restricted visibility and lack proper public hard shoulders. The only widened sections are private parking bays located outside newer houses, which remain the responsibility of homeowners and are not intended for pedestrian use or roadside safety. The introduction of heavy construction traffic, HGVs and stop/go traffic systems would significantly increase congestion and road safety risks for schoolchildren, residents and all road users.

Furthermore, the proposed Gannow Wind Farm, which is currently the subject of a first party appeal to An Coimisiún Pleanála (PL07.500493), intends to utilise the same road network as the proposed development. There was been no cumulative assessment of traffic and transport and the impact on the road network in the current proposal. The local road network and community will experience disproportionate disruption and adverse conditions that have not been considered or assessed.

Moreover, there is a need to consider the refusal reasons issued by Galway County Council for the Gannow Wind Farm under Pl. Ref. 25/61412. Refusal Reason No. 1 and 2 of the Gannow Wind Farm relate to the creation of a traffic hazard on the public road. The third and final reason for refusal relates to the inadequacy of the Environmental Impact Assessment Report in terms of roads and transportation. It is respectfully suggested the current proposed for the grid infrastructure for the Cashla peaker plant creates the same issues in terms safety and endangering public safety by reason of a traffic hazard and obstruction of road users. All road users, including school children, farmers, local walkers as well vehicles such as buses and cars will be severely impacted. There is a clear traffic hazard in creating such a high-level of disruption for such an extended period, despite the Applicant indicating it to be short-term, it is respectfully contended that 5-months is not short-term when every element of life is impacted. These are active farming and residential areas with homes, schools, farms and local businesses located along narrow rural roads. We are concerned about the

level of disruption the proposed works would cause to residents, farms, local roads and daily community life.

There has been a clear lack of sufficient consideration to the impact on the local road network and the heavy construction traffic so close to so many homes. The application documentation confirms significant road closures, stop/go traffic systems and substantial HGV movements during construction, which could result in serious disruption and ongoing inconvenience for local residents and road users. However, as stated above, this was not made evident in the engagement material and therefore, the vast majority of households did not flag the project as a major issue until much later. The high-level of impact and disruption should have been communicated appropriately. It is respected submitted that the lack of detail in the leaflet drop to impacted homes was a considered strategy and this is wholly unacceptable.

Landscape Character and Value

Although this application is being considered separately, the proposed development form part of a wider connected energy development and would contribute to the increasing industrialisation of the surrounding countryside through the concentration of substations, lighting, fencing and associated infrastructure within a quiet rural area. Chapter 4 of the Galway County Development Plan 2022-2028 contains policies and objectives around rural living and development. It is a strategic aim of Galway County Council to *'protect and enhance the visual qualities of rural areas through the sensitive design of associated development.'* The proposed development is considered directly contrary to this aim.

Galway's landscape includes stonewalls, hedgerow and woodland to create a distinctive character. Policy TWHS 1 Trees, Hedgerows, Natural Boundaries and Stone Walls of the Galway County Development Plan 2022-2028 aims to protect and retain existing hedgerows particularly species rich roadside and townland boundary hedgerows. Policy ICT 8 Underground Cabling requires habitat loss including the loss of hedgerow to be minimised. However, the construction activity and vegetation disturbance, particularly on narrow roads, will negatively affect biodiversity and the ecological character of the surrounding rural landscape.

There is also insufficient information regarding the long-term landscape reinstatement and ongoing maintenance responsibilities following completion of the proposed works. In my view, the cumulative impact of vegetation loss, hedgerow disturbance and infrastructure works could have a lasting effect on the visual amenity and landscape character of the surrounding rural area. This is directly contrary to policies and objectives surrounding the preservation and enhancement of the landscape. The local community are not against development, but development in inappropriate locations must be prevented. The proposed development, which is of an industrial scale, is clearly inappropriate in this rural area.

Climate Policy

The proposed development is for the associated cabling and infrastructure of the proposed Cashla Peaker Plant currently under consideration by Coimisiún Pleanála (Ref. ACP-324113-26). The proposed substation, mast and underground cable infrastructure of this application are intended to support the operation of this new gas-fired electricity generation infrastructure. It is critical the proposed cabling infrastructure in this application is not considered in isolation. The proposal must be considered in its entirety. Overall, the proposed developemtn is considered contrary to climate action policy and the drive towards renewable energy. The proposed development would facilitate the continued burning of fossil fuels when national and EU policy calls for renewable energy and the reduction of fossil fuel usage. There is a target of a 51% reduction in greenhouse gas emissions by 2030 and reaching climate neutrality by no later than 2050. The current proposal will do the opposite. The ambition of the Climate Action Plan 2025, and its forthcoming successor, and the requirements under the *Climate Action and Low Carbon Development (Amendment) Act 2021* cannot

be achieved if developments such as the current proposal are facilitated. The focus should be on the delivery of renewable energy development that will directly contribute towards Ireland's climate ambition and does not present such significant risk for human health, as the proposed peaker plant will.

The local area is already contributing towards this ambition with the Ballymoneen Solar Farm (Galway County Council Pl. Ref. 20/961 and Reg. Ref. 22/61105) currently under construction. While there has been associated disruption with this development, there is a more evident common good element as this solar farm will help reduce Ireland's reliance on fossil fuels and meet our climate goals. However, there is little sense in allowing a peaker plant and its associated cabling infrastructure to proceed when the benefits of the solar farm will be immediately lost.

There should be a greater priority should be given to renewable energy, energy storage and lower-carbon infrastructure solutions rather than substantial long-term investment in infrastructure associated with fossil fuel generation. In my view, the proposed development raises concerns regarding consistency with future climate policy, sustainable development principles and Ireland's transition towards a lower-carbon energy system.

This infrastructure is considered wholly inappropriate in the context of the climate emergency and the ambitious targets to reduce Ireland's greenhouse gas emissions. The proposed development cannot be reconciled with the urgent need to reduce reliance on fossil fuels. An Coimisiún Pleanála must be consistent with Ireland's national climate plans and carbon budgets in the performance of its planning power. This has been solidified in case law, including in a ruling by the Supreme Court which requires decisions to be consistent with national climate objectives. It is clear that the proposed peaker plant is not consistent with these objectives.

Health and Wellbeing

There is insufficient information regarding the long-term cumulative impact of emissions associated with the wider development. Given the proximity to homes and rural communities to the proposed infrastructure, we believe a precautionary approach should be applied in relation to air quality and the protection of public health, including compliance with Directive 2008/50/EC on ambient air quality.

Furthermore, the proposed cable route passes through an active farming area supporting livestock farming, milk collection, machinery movement and daily farm access. We are concerned about the disruption that prolonged trenching works, road occupation and construction activity would cause to the normal operation of farms throughout the area, particularly along narrow rural roads heavily relied upon by the agricultural community. Farmers are disproportionately affected by suicide and mental health challenges compared to the general population. Such extensive disruption to farming life will add to the challenges faced by farmers and negatively impact their wellbeing.

Conclusion

There are serious concerns regarding the appropriateness of the proposed development and the information that has been provided. The cumulative impact of the proposed substation, mast and underground cable route has not been adequately assessed and there has been an associated lack of communication to the surrounding community. Significant concerns remain regarding the creation of a traffic hazard and the disproportionate impact on the surrounding rural area. The proposed development, the cabling and associated infrastructure for the peaker plant, will endanger public safety by reason of a traffic hazard and obstruction of road users and is out of character with the surrounding rural area.

More widely, the peaker plant itself is contrary to national climate targets and will instead facilitate a continued use of fossil fuels. In the current climate emergency, this is wholly inappropriate and

should not be enabled. By reason of endangering public safety, impact on landscape character and the clear contravention of climate policy, the proposed development should be refused.

Yours Sincerely,

Martin and Threasa Ruane

[Signed electronically]

Name: Martin and Threasa Ruane

Date: 25th May 2026