

THIRD PARTY OBSERVATION – SID APPLICATION CASE REF. 324162

Permission for 220kV Substation and 220kV underground electricity cabling connecting to the existing Cashla 220kV substation

Submitted by: Maryrose and Philip McGregor

Address: Castlambert, Athenry, Co. Galway H65 WY26

Distance from proposed grid route: We live on the L7108 (Lisheenkyle East Road) – the road proposed for full closure during grid connection works

Date: 26th May 2026

Case Reference: SID Application VA07.324164

Dear Members of An Coimisiún Pleanála,

My name is Maryrose McGregor. I write this observation on behalf of myself, my husband Philip, and our four children. We live at Castlambert on the L7108 (Lisheenkyle East Road) – the road the applicant proposes to close completely for up to five months during grid connection construction works. We formally object to this SID application and ask An Coimisiún Pleanála to refuse permission.

This application seeks permission for a 220kV electrical substation, a 36-metre telecommunications mast, an 8.1km underground grid connection requiring trenching along our road, ten joint bays (each 8m × 2.5m × 2.05m), and associated infrastructure. The grid connection route runs directly along the L7108 – the road we live on, the road our children use to get to school, the road that serves every home in our townland.

The applicant's own documentation confirms that the L7108 will require a full road closure for three months during main cable construction, plus an additional two months for resurfacing – a total of five months of sustained, cumulative disruption (NTS Table 10-1; Construction Grid Connection Report Table 1-4).

The applicant carried out no traffic survey on our road, a road they propose to close for a minimum of 5 months. No baseline data was collected so that it could be known how many people use this road daily. Using our home security camera that is facing the road, I was able to gather this information. This was done on Friday the 15th of May, and all traffic and road users were counted on the L7108 in front of our house. This was a typical working weekday during a period of normal agricultural activity, the count recorded 606 vehicle and pedestrian trips using this road. That is 606 journeys made by people living on this road, working on farms served by this road, bringing children to school, accessing their homes, moving agricultural machinery, and going about their daily business.

The traffic survey was conducted during a period that did not capture traffic patterns associated with peak seasonal agricultural operations, including silage-cutting, slurry-spreading, and related heavy machinery and haulage movements. The survey baseline therefore cannot be considered representative of peak agricultural traffic conditions on the affected road network.

The survey period similarly did not coincide with livestock sale activity at Athenry Mart, and accordingly does not reflect the peak livestock transport movements – including cattle haulage and agricultural contractor traffic – that are characteristic of the wider rural road network served by the L3103 and connecting local roads.

Furthermore, the survey period may not fully capture peak operational traffic associated with existing commercial and industrial uses within the receiving environment. Vehicle movements generated by Avrame, Creva Agri, C&F Tooling, and Cashla Quarries – together with the broader pattern of agricultural, commercial, and commuter-related traffic characteristic of the surrounding rural road network – are not adequately reflected in the baseline data presented.

This traffic survey gives a glimpse into what traffic the L7108 carries, however a fully detailed survey should be undertaken by the applicant, at the junction of L3103 with L7108 and also the junction of L7108 with L1709, so that the full extent of the road closures can be assisted.

Time Period	Car / SUV	Jeep	Jeep towing	Van	Bus	Heavy goods vehicle	Milk Lorry	Tractor	Tractor towing	Motorcycle	Bicycle	Pedestrian	Total
00:00-00:59	2												2
01:00-01:59													0
02:00-02:59													0
03:00-03:59													0
04:00-04:59								1					1
05:00-05:59	2												2
06:00-06:59				1							1		2
07:00-07:59	9	3		4								5	21
08:00-08:59	46	2		5	2	4					2	1	62
09:00-09:59	52	3		1		3							59
10:00-10:59	11			2		1					1		15
11:00-11:59	22			1		4							27
12:00-12:59	26	2		2		7	1	1			3		42
13:00-13:59	19	4		1		1			1			2	28
14:00-14:59	50	4		2	2	3					1		62
15:00-15:59	21	2	2	3		1			1				30
16:00-16:59	28		2	10		2			2		1		45
17:00-17:59	36	5	2	3				1	2		1	1	51
18:00-18:59	46	1	3	4				1	1			1	57
19:00-19:59	24			3								1	28
20:00-20:59	29	1		1								2	33
21:00-21:59	12		2	1					2				17
22:00-22:59	9			1					1			2	13
23:00-23:59	8							1					9
Total	452	27	11	45	4	26	1	5	10	0	10	15	606

Detailed breakdown of the traffic survey recorded on 15/05/26

The 8km Diversion – An Additional 5km Added to Every Journey

The applicant's proposed diversion route for the L7108 adds approximately 5km to every journey (NTS s.10.2.1.2.1). The diversion runs: L7109 → R339 → L3103. For five months.

I would say that this is not accurate, or detailed enough, it is too simplified. When we have to travel via L7109 onto R339 to get access back onto L3103, our access road to Athenry town, it will add an additional 8.69km to my journey, nearly double what the applicant is implying.

This is why I am saying it is too simplified, the proposed diversion, is only relative to the location someone is living in.

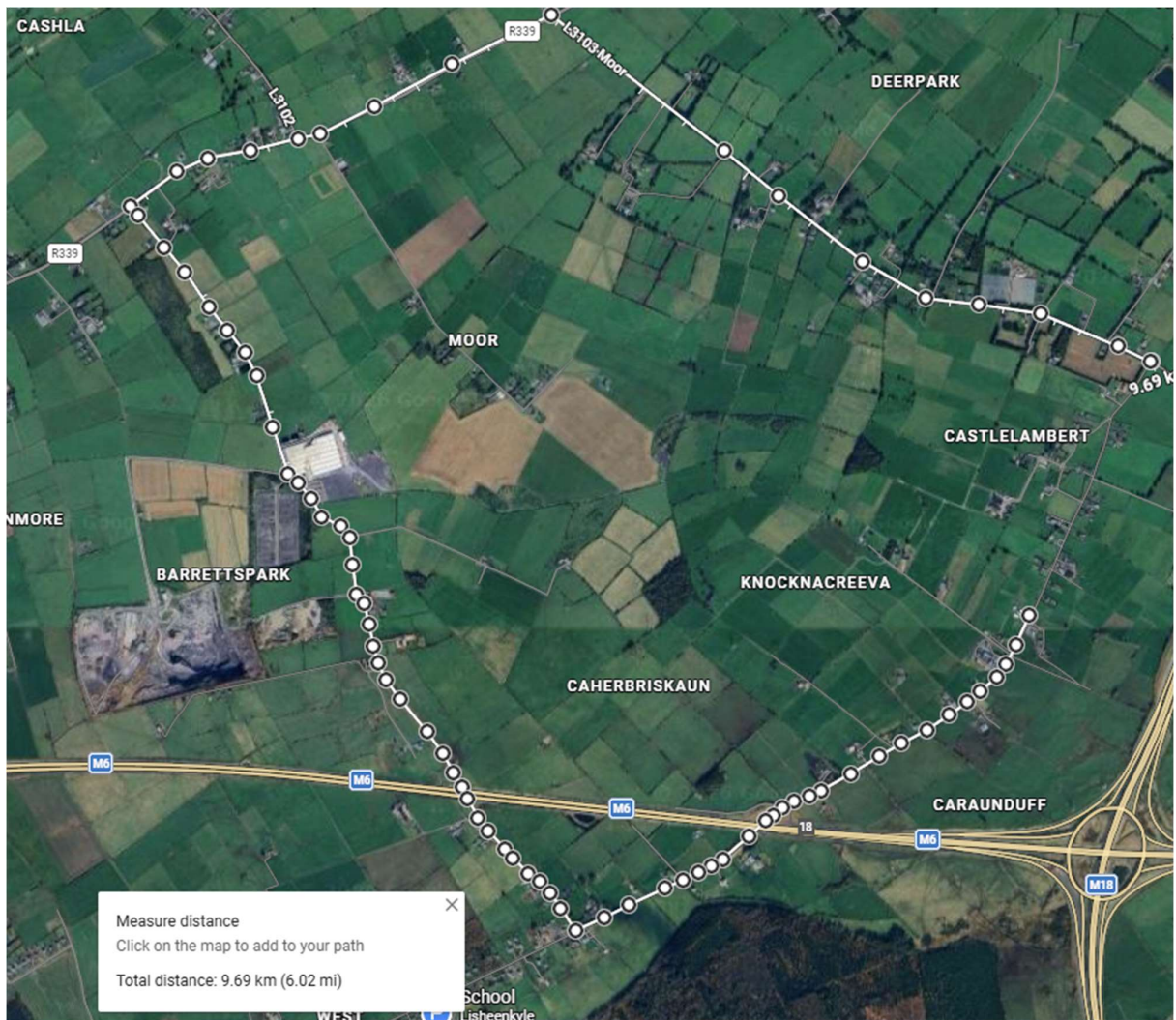
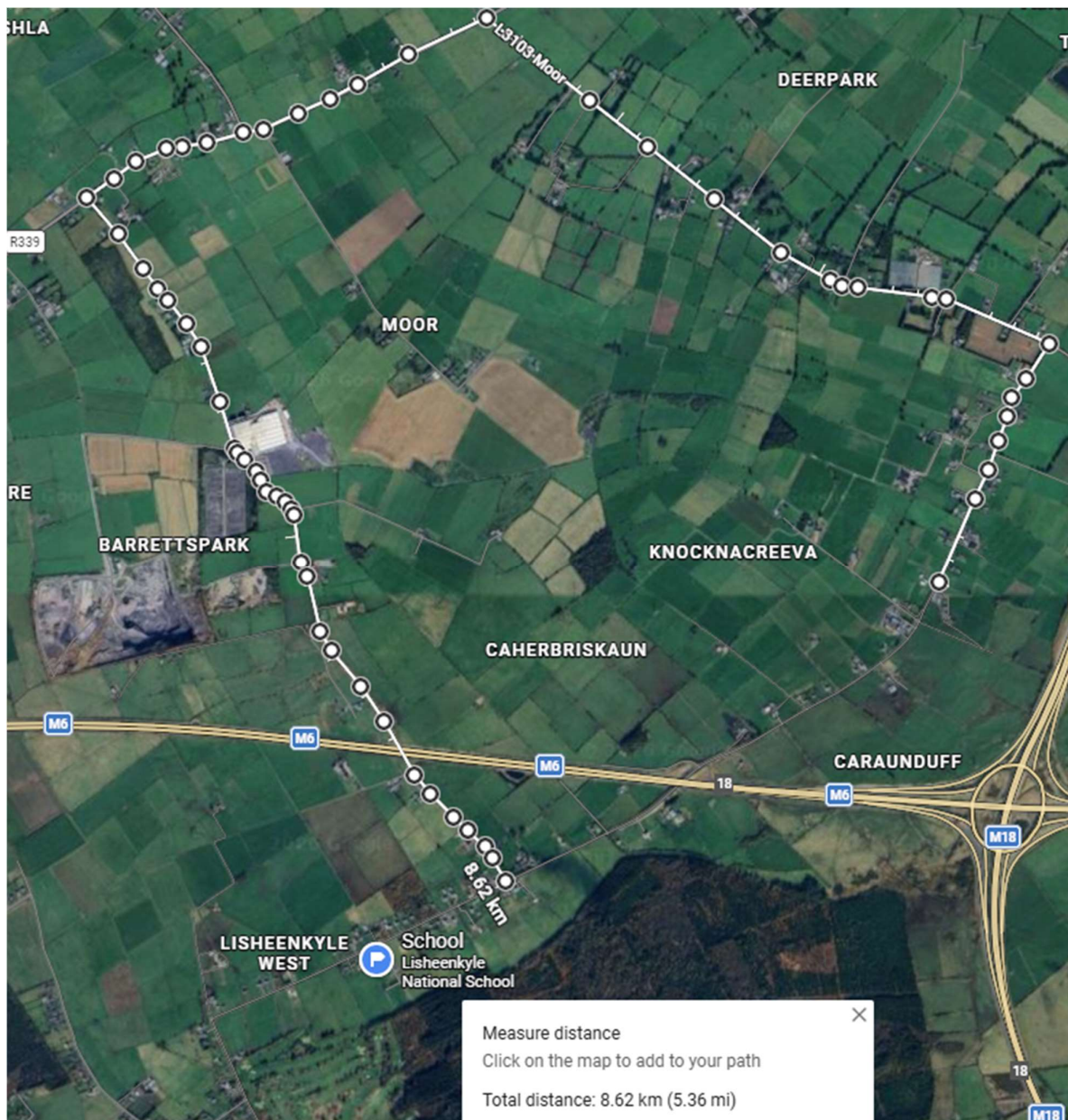


Image above shows the diversion proposed when the road is closed, when I need to access Athenry town or collect my children from secondary school or sport or music activities.

Equally if I am diverted the opposite direction, when road is closed and I need to drop of or collect my kids from Lisheenkyle school, it will be an extra 6.62km to our journey, 13.24km round trip twice daily.



For our family alone, this means:

- Four school runs per day (two children to Presentation College Athenry, two to Lisheenkyle NS) – each round trip now adds 13.24km – 17.38km each time. That will be an extra 170km in a 5 days, over the 5 months is 3740km extra travel just to access our schools.
- Evening activities: football training at Athenry Football Club three times a week, music lessons at Athenry Music School, weekly golf at Athenry Golf Club – every trip diverted
- Every shopping trip, every medical appointment, every visitor to our home

The applicant states that residents will be able to access their properties "from each side of the closure segments" via limiting trench lengths to 30-50m sections. This does not address the fundamental issue: to leave our home and travel anywhere beyond Castlelambert, we must take the 8km diversion. Every time. For five months.

Cumulative Impact Across Multiple Roads – The L3103 Remains Partially Closed

The proposed diversion route itself will be disrupted. The L3103 – the road the diversion sends us onto – will experience partial road closures with Stop/Go traffic management and a minimum 2.5m wide carriageway ("the width of a parking space") for one month during main cable construction and three weeks during resurfacing (NTS Table 10-1).

This means that even on the diversion route, our journey will be further delayed by single-lane working, temporary traffic lights, and restricted road widths. The cumulative effect is not assessed anywhere in the application documentation. The disruption compounds.

Our Home –Now Threatened by Construction Vibration

We completed construction of our family home in Castletambert in the last five years. It is an A-rated energy-efficient home with mechanical ventilation, PV solar panels, and a heat pump. We invested everything we had to build it right. The house sits on karst limestone ground, as confirmed by the applicant's own hydrogeological assessment of the wider area (EIAR Vol. 2, p.572).

The Construction Grid Connection Report (Appendix 2.7) confirms that the underground cable installation requires:

- Tracked excavators (13-tonne normal operation, 22-tonne for rock breaking)
- Excavation of trenches 750mm wide and up to 1.45m deep for cable ducting
- Installation of joint bays – pre-cast concrete structures 8m × 2.5m × 2.05m, excavated and lowered into position by HIAB vehicles
- Heavy cable drum transport and pulling operations with articulated trucks

This construction activity will occur directly outside our home, on the road that runs past our front boundary. Engineering literature consistently confirms that rock breaking, heavy tracked excavators, and the installation of large pre-cast concrete structures generate ground-borne vibration capable of causing structural damage to nearby buildings – particularly in karst terrain, where vibration propagation is less predictable than in conventional soil.

Structural damage from construction vibration typically first appears as cracking at corners of windows and doors, settlement of foundations, and disturbance to finishes. Our home has never been subject to a structural survey. If cracks appear during or after grid connection construction works, **we have no baseline record to prove the damage was caused by the works.**

The application contains no commitment to conduct pre-construction structural and photographic surveys of residential properties on the L7108. The Construction Grid Connection Report references a traffic management plan and consultation with Galway County Council, but makes no reference to residential property protection protocols, vibration monitoring, or compensation mechanisms.

Without a pre-construction baseline survey and without a binding commitment to continuous vibration monitoring at residential properties during works, homeowners on the L7108 are left

with no protection and no recourse if structural damage occurs. This is unacceptable for a development of this scale and duration.

Our front boundary wall is constructed of dry cut stone and limestone capping, it was done by a skilled stonemason. It runs alongside the L7108, 3 meters from the edge of the road. If heavy construction traffic, tracked excavators, or the installation of joint bays causes ground-borne vibration or differential settlement in the karst bedrock beneath the wall, cracking or displacement could occur. As with the house itself, no pre-construction photographic or structural survey has been proposed. Any damage that occurs during construction works will be impossible to prove or claim for without a baseline record.

Emergency Access – Five Months Without Direct Route to Hospital or Fire Services

Our family includes four children aged 10 to 17. My senior citizen parents live Castlelambert. In a medical emergency, every minute matters.

Under normal conditions, the route from Castlelambert to University Hospital Galway via the L7108 and M17/M6 is direct and takes approximately 20 minutes. The applicant's proposed diversion route adds 5km and diverts us onto roads that will themselves be subject to Stop/Go traffic management and single-lane working on the L3103.

In the event of a medical emergency during the five-month closure period:

- An ambulance responding to our home will face an 8km diversion
- If we need to drive an injured child to hospital ourselves, we face the same 8km diversion, plus potential delays at Stop/Go signals on the L3103
- If a fire breaks out at our home, fire services from Athenry Fire Station will face the same diversion and delays

The application does not assess emergency access delays during road closures. The CEMP references traffic management and local consultation, but contains no protocol for prioritised emergency vehicle access, no commitment to keeping one lane of the L7108 open during medical emergencies, and no assessment of cumulative delay when emergency vehicles must divert 8km and then encounter Stop/Go systems on the L3103.

Ten Joint Bays in Our Road – Permanent Below-Ground Infrastructure

The application proposes ten joint bays along the 8.1km underground cable route. Joint bays are pre-cast concrete structures, each 8m long × 2.5m wide × 2.05m deep, installed below ground level to facilitate jointing of cable lengths (Construction Grid Connection Report s.9.3). Joint Bay 6, with a comms chamber and Link box is proposed to be located 120meters from our house and joint bay 07, approximately 700meters away.

The Technical Note on Cumulative Impact (Appendix 16.2) states that where joint bay locations are constrained by limited working space and narrow road profiles, "a temporary road closure would be envisaged for the HIAB vehicle, to install the Joint bays at the desired location, to allow for sufficient working space for cable drums, pulling equipment, and maintenance vehicles."

The L7108 is a narrow rural road. The installation of Joint Bay 6 within this road will require:

- Excavation of a pit large enough to accommodate an 8m × 2.5m × 2.05m structure
- Delivery and positioning of a pre-cast concrete structure weighing several tonnes via HIAB articulated vehicle
- Temporary full road closure to allow working space for the HIAB vehicle and associated plant
- Associated communication chambers and earth sheath link chambers at each joint bay location, each requiring separate excavation and installation

The EIAR and supporting documentation provide no specific timeline for joint bay installation at JB-06 and JB-07 on the L7108. If rock breaking is required on the karst ground they will encounter, this is additional closure time, over and above the three months for main cable construction and two months for resurfacing already identified.

Permanent Below-Ground Constraints on Future Development

The joint bays, communication chambers, and link boxes will remain permanently below the L7108 after construction is complete. Each joint bay has a surface access hatch which will match existing ground levels (Construction Grid Connection Report). These structures will be present in our road for the life of the cable infrastructure and beyond.

The application does not address:

- Whether any exclusion zones or restricted excavation areas apply around joint bay locations
- Whether utility connections (water, telecommunications, drainage) for future developments on land adjoining the L7108 can cross or excavate near joint bay locations
- Whether consent from EirGrid or the cable operator will be required for any future roadworks, drainage works, or service installations in proximity to these structures
- What liability framework applies if future development proposals are refused or delayed due to the presence of these structures

These structures will effectively sterilise our road for future expansion and maintenance according to Galway county council road observation on the linked application 324113. We

hope our children may want to build here in the future, what happens when they look for a water connection, what extra costs will be put on them for the extra precautionary work that will be involved in opening the road for any connection.

The applicant's decommissioning plan explicitly states that *"the cable will remain within the roads after decommissioning and will not be removed"* (EIAR Volume 2, p.140).

The 220kV underground cable and its associated ducting, joint bays, chambers, and link boxes will remain permanently beneath the L7108. This is not temporary infrastructure. It is a permanent, high-voltage electrical transmission corridor running through our road, past our home, for the indefinite future.

The application provides:

- No assessment of the impact of permanent high-voltage infrastructure on the development potential of adjoining lands
- No identification of wayleaves, easements, or safeguarding corridors
- No clarity on what restrictions apply to excavation, tree planting, drainage installation, or utility connections near the cable corridor
- No framework for securing consent from the cable operator for future works affecting the cable route

This creates long-term uncertainty for every landowner whose property adjoins the L7108. The application does not address any of this.

The 220kV Substation and 36-Metre Telecommunications Mast

While this objection focuses primarily on the grid connection infrastructure and road closure impacts that directly affect our daily life, we note for completeness that the application also includes a 220kV electrical substation comprising a single-storey Air-Insulated Switchgear building (approximately 388 sqm), transformer, electrical plant and apparatus, and a 36-metre telecommunications mast.

These structures are industrial in scale, permanent in duration, and form part of the wider Cashla energy infrastructure complex that includes the proposed gas peaker plant (SID Application 324113, to which we have separately objected). The cumulative visual, noise, and landscape impact of this infrastructure on the rural character of Castletambert and the surrounding area has not been adequately assessed in isolation or cumulatively.

What We Are Asking For

We formally and respectfully object to SID Application Case Reference 324162 and ask An Coimisiún Pleanála to **refuse this application.**

If An Coimisiún Pleanála is minded to consider permission, we ask that no determination issue until:

- A comprehensive traffic impact assessment is conducted for the L7108, addressing the disruption to 606 daily vehicle trips over a five-month period, including cumulative delays arising from simultaneous partial closures on the L3103 diversion route
- A formal emergency access protocol is provided, including guaranteed priority access for ambulances and fire services during road closures, and an assessment of cumulative emergency response delays
- Pre-construction structural and photographic surveys of all residential properties and boundary structures on the L7108 are conducted and lodged with An Coimisiún Pleanála, with a binding commitment to continuous vibration monitoring during all excavation and joint bay installation works
- A compensation and remediation protocol is provided for any structural damage caused by construction vibration, with financial security lodged to guarantee performance
- A detailed joint bay installation timeline is provided for JB-06 on the L7108, including duration of full road closure required for installation works
- The permanent development constraints imposed by the 220kV cable, joint bays, and associated chambers are clearly identified, including any exclusion zones, wayleave requirements, and restrictions on future excavation, utility connections, or development on lands adjoining the cable route
- A framework is provided for securing consent from EirGrid or the cable operator for any future works affecting the cable corridor, with clarity on timelines, costs, and liability

We came home to Castletambert to build our family's future on land that has been in our family for generations. We built an A-rated home, invested in renewable energy, and hoped our children would one day raise their own families here.

This application and the larger cashla peaker plant application threatens that future. Five months of road closure. 606 daily trips disrupted. No baseline structural survey. No emergency access protocol. A 220kV cable and ten joint bays permanently beneath our road. No clarity on what restrictions will apply to our land, our children's land, for decades to come.

We ask An Coimisiún Pleanála to protect our family, our home, and our future, and to refuse this application.

Yours faithfully,

Maryrose McGregor and Philip McGregor

26th May 2026