

FORMAL OBSERVATION ON STRATEGIC INFRASTRUCTURE DEVELOPMENT

VA03.324491

To: An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Date: 27 September 2026

From: Teresa Crawford and Peter McCarthy
Coire Meala, Castlebank, Ardnacrusha, Co. Clare, V94 W6KV

Subject: Observation on Reeve Wave Ltd. proposed 110kV substation and underground grid connection –
VA03.324491

Dear An Coimisiún Pleanála,

1. Introduction

We wish to make a formal observation in relation to the above application by Reeve Wave Ltd. We are residents of the historic residential avenue at Ardnacrusha and are directly concerned about the proposed underground cable route and its implications for the four homes served by the avenue.

Our home is the last house in the cul-de-sac. There are four houses in the avenue and there is only one entrance and exit serving all four properties.

2. The proposed development

The application seeks 10-year permission for a 110kV Air-Insulated Switchgear (AIS) electrical substation and associated infrastructure, together with approximately 5.6 km of 110kV underground cabling. The application describes approximately 4.75 km of the cable route as following public-road corridors and approximately 0.85 km as following new access tracks.

The application is intended to facilitate the grid connection of Ballyglass Solar Array Phase 1 and Phase 2.

Our observation is focused particularly on the proposed route through the established residential avenue, the protection of existing rights of way and access, emergency access, the suitability of the proposed route, and the need to properly consider an alternative route which would avoid taking major construction works through a residential area.

3. The proposed cable route through the residential avenue

Having examined the application route on the ground and on the application drawings, we understand the proposed underground cable to run approximately two-thirds of the way down the residential avenue. It reaches the area between Houses 2 and 3 on the left-hand side of the avenue and then turns left onto the original roadway which historically connected the four ESB houses to the main entrance of the ESB station.

This roadway is not the old entrance to the power station itself. It was the original connecting road serving the four ESB houses and linking them to the main entrance. It has been closed and disused for many years.

The proposed route therefore brings the cable construction works a substantial distance into a small residential avenue before turning onto a long-disused roadway. We ask the Commission to examine very carefully why this route has been selected and whether it is appropriate to introduce major underground electrical infrastructure and associated construction activity through an established residential area when an alternative route avoiding the residential avenue could be identified and assessed.

4. Existing right of way — protection must be a priority

A central issue in this application is the existing right of way serving the residential properties.

We hold historical Land Registry and conveyancing documentation relating to the former ESB staff houses. A Deed of Grant dated 20 October 1978 records that the Electricity Supply Board, then the registered owner of Folio 11824 (Revised), granted the purchaser of No. 1 Ard Na Crusha a “full and free right of way at all times and for all purposes” over an identified portion of the Board's lands, shown on an approved scheme map. The historical documentation also records the transfer of the dwelling to a new folio while Folio 11824 remained registered to the Electricity Supply Board at that time.

Separate historical correspondence from Arthur Cox describes the private roadway as the Board's roadway leading from the houses to the public road and refers to the right of way being given to the purchasers in Ard Na Crusha.

We do not ask the Commission to determine private title as part of this planning process. However, the existence of these formal historical rights is directly relevant to the planning assessment because the proposed works would take place within the access serving the homes.

We ask that the Commission treat the protection and uninterrupted exercise of the existing right of way as a fundamental issue and require the applicant to establish, before any decision is made, the current ownership and legal status of the roadway, the registered rights affecting it, and the exact legal basis for carrying out any excavation, cable installation, temporary works or construction traffic within or affecting the access.

There should be no assumption that residents' established access rights can be dealt with later through a contractor's traffic-management arrangements. Any permission should protect those rights expressly and enforceably.

5. Full consultation with the affected residents before a decision

Because the proposed route enters approximately two-thirds of the residential avenue and directly affects the sole access serving four homes, we believe the affected residents should have the opportunity to understand and respond to the precise access arrangements before a decision is made.

We did not receive direct communication specifically about the current VA03.324491 application explaining that the proposed cable route would enter substantially into the residential avenue and affect the access serving the four homes.

We recognise that statutory advertising is the formal planning process. However, in these particular circumstances, we respectfully ask the Commission to require clear and specific information from the applicant concerning the proposed works, access arrangements, construction sequencing, temporary restrictions, emergency access and protection of the right of way, and to ensure that these matters are properly addressed before permission is granted.

The protection of an established residential right of way should not be left to informal consultation after a planning decision has already been made.

6. A strong preference for an alternative route avoiding the residential avenue

We respectfully ask the Commission to require the applicant to identify, assess and, where feasible, adopt an alternative cable route and construction access arrangement which avoids the residential avenue altogether.

We are not opposed to the development of necessary grid infrastructure. Our concern is specifically with the choice of a route which would take major cable construction approximately two-thirds into a four-house residential avenue and then use a long-disused connecting roadway.

Where a technically and legally feasible alternative can avoid the residential avenue, we believe that option should be preferred in the interests of residential amenity, road safety, emergency access, protection of established rights of way and minimising construction disruption.

At a minimum, the applicant should provide the Commission with a clear comparison of the route through the residential avenue against all reasonably available alternatives, including the reasons for rejecting any alternative that would avoid the houses. The Commission should not accept the residential route simply because it is convenient if a practicable alternative can achieve the required grid connection without bringing construction through the residential area.

7. Four homes, one access and emergency access

The four houses are served by one entrance and exit. There is no alternative public-road access to the individual homes.

A cable construction project involving excavation, duct installation, concrete works, cable installation and reinstatement would take place in a constrained residential environment. The application documentation describes substantial excavation and construction activity.

Any obstruction, closure or unsafe restriction at the avenue entrance or along the route could affect all four homes simultaneously.

Emergency access is therefore a particularly serious concern. The application should demonstrate, before permission is granted, how a fire appliance, ambulance and other emergency vehicle can reach every property at all times during construction.

We ask that a detailed emergency-access arrangement be agreed and secured by condition, rather than relying on general assurances that residents will be informed before works commence.

8. Construction traffic and residential amenity

We ask that particular attention be given to construction traffic, heavy vehicles, excavation, concrete deliveries, temporary restrictions, dust, noise, vibration, lighting, mud, pedestrian safety, road safety and reinstatement.

The applicant's Construction and Environmental Management Plan describes the cable installation as involving excavation, mechanical plant, concrete delivery, duct installation, cable pulling and reinstatement. It also envisages communication with affected residents before construction.

Those general measures do not answer the specific question of how four homes sharing one access will function while construction takes place approximately two-thirds of the way down their avenue.

The Commission should assess the actual day-to-day effects on these homes, including the duration and sequencing of works, working hours, vehicle movements, temporary access arrangements and the possibility of delays or unexpected construction difficulties.

9. Historic Engineers Avenue and the 100-year-old houses

The avenue has a significant historical association with the development of Ardnacrusha. It was historically known as Engineers Avenue and was established as housing associated with the engineering staff of the Ardnacrusha hydro-electric scheme. The houses are approximately 100 years old in 2026.

Our house was the accommodation associated with the Chief Engineer, with the other houses historically associated with senior engineering/deputy engineering staff. We provide this information as part of the local history and established character of the residential avenue.

Ardnacrusha was commissioned in 1929 and is associated with the historic Shannon hydro-electric development. The proposed works should therefore be assessed in the context of a long-established residential setting which was created as part of the original development of the power station.

10. The applicant's construction documentation and the need for certainty

We note that the applicant's Construction and Environmental Management Plan is described as a working document which may be updated and further developed by the selected contractor.

We also understand from the application documentation that the precise connection point within the existing Ardnacrusha 110kV substation is subject to ESB and EirGrid requirements.

In circumstances where the proposed route enters deeply into a four-house residential avenue, the Commission should be satisfied that the access arrangements, legal rights, construction interface and emergency-access arrangements are sufficiently defined before permission is granted.

The protection of residents' right of way and access should not be deferred to a later contractor-stage methodology.

11. Electromagnetic fields and human health

We are concerned about the proximity and cumulative presence of electrical infrastructure in and around this established residential area.

We are not asserting that the proposed or existing electrical infrastructure causes cancer or other disease. Our concern is that the application should provide a clear, site-specific and transparent assessment of electromagnetic fields associated with the proposed 110kV cable and substation, particularly given the proximity of the route to established homes.

We ask that the Commission require the applicant to clearly identify predicted electric and magnetic field levels at the nearest homes, the distances used, the maximum relevant operating conditions, the standards or exposure guidelines relied upon, and the cumulative context of existing electrical infrastructure.

Any health-related assessment should be evidence-based and should clearly distinguish established scientific evidence from areas of continuing scientific uncertainty.

12. Cumulative impacts

The proposed development should not be considered in isolation. The wider Ardnacrusha/Castlebank area has experienced a number of renewable-energy, electrical and grid-connection proposals.

The current application itself is intended to facilitate the grid connection of Ballyglass Solar Array Phase 1 and Phase 2. Other planning proposals in the wider area have also involved electrical connections and infrastructure associated with the Ardnacrusha station.

We ask the Commission to consider cumulative effects on this small established residential community, including construction traffic, road use, excavation, noise, dust, electrical infrastructure, residential amenity and the practical burden of repeated infrastructure works.

Recent planning history, including the Ballycar wind-farm application ABP-318943-24, forms part of the wider planning context. We do not suggest that the decision in that separate case determines this application.

13. Requests to An Coimisiún Pleanála

In light of the above, we respectfully request that An Coimisiún Pleanála:

1. Treat the protection and uninterrupted exercise of the existing residential right of way as a fundamental consideration in determining this application.
2. Require the applicant, before any decision is made, to establish the current ownership and legal status of the roadway and the precise rights affecting the four residential properties.
3. Require the applicant to demonstrate how the right of way will remain fully usable and legally protected throughout construction and thereafter.
4. Require full and meaningful consultation with the four directly affected households concerning the precise construction route, access arrangements, sequencing, temporary restrictions and emergency access before any permission is granted.
5. Require the applicant to identify, assess and seriously pursue a feasible alternative cable route and construction access which avoids the residential avenue.
6. Require a clear comparison of the proposed residential route with reasonably available alternatives, including the planning, engineering, environmental and residential reasons for selecting the proposed route.

7. Require a precise and enforceable plan demonstrating continuous safe access to all four homes throughout construction.
8. Require specific arrangements for emergency access for fire, ambulance and other emergency services at every stage of the works.
9. Require the applicant to identify the exact point where the cable leaves the residential avenue and enters the former connecting roadway, and to explain the proposed use, ownership, legal status, condition and suitability of that disused roadway.
10. Require a detailed construction traffic and management plan addressing excavation, heavy vehicles, concrete deliveries, temporary restrictions, pedestrian safety, noise, dust, vibration, lighting, mud and road reinstatement.
11. Require a site-specific electromagnetic-field assessment at the nearest homes, including maximum relevant operating conditions and the cumulative context of existing electrical infrastructure.
12. Assess the cumulative impacts of this proposal with other existing, permitted and proposed renewable-energy and electrical infrastructure in the surrounding area.
13. If the residential route cannot be avoided, require clear and enforceable conditions specifically protecting residential access, emergency access and the existing right of way, rather than leaving those matters to later contractor-stage arrangements.

14. Conclusion

We are not opposed to renewable energy or to the responsible development of Ireland's electricity infrastructure. Our concern is the particular route proposed through this established residential community.

Four approximately 100-year-old homes share one entrance and exit and have established rights of way associated with the historic ESB residential development. The proposed cable would, as we understand the drawings, travel approximately two-thirds of the way down the avenue before turning onto the original roadway which historically connected the four houses to the main ESB entrance. That roadway has been closed and disused for many years.

We respectfully ask the Commission to give priority to protecting the existing residential right of way and continuous access, to ensure full consultation with the affected residents before a decision is made, and to require the applicant to properly investigate and pursue an alternative route which avoids the residential avenue.

If a practicable alternative can achieve the required connection without bringing major construction works through the residential area, we believe that option should be fully assessed and, where feasible, adopted.

At a minimum, no permission should be granted without clear evidence that the existing right of way, emergency access and residential amenity can be protected by enforceable conditions throughout the construction and operational phases.

Yours faithfully,

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