

An Bord Pleanála 64 Marlborough Street, Dublin 1, D01V902 15.01.2025	Mr. Shane Butler Cam, Brideswell, Athlone, Co. Roscommon
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Re: Planning application for a 110 kilovolt electricity substation, approximately 7.5 kilometres of underground electricity line and all associated works at Moyvannan, Feamore, Lisbaun, Carrownolan, Carrowncloghan, Carrowkeeney, Ardmullan, Curraghboy, Gortnasythe, Derryglad, Eskerbaun, and Brideswell, County Roscommon

Ref. No. 321238

Dear Sir/Madam,

I attach a report by Ms. R. Burke, Chartered Engineer which contain my observations on the above application for your consideration. I also wish to request an Oral Hearing.

The fee of €50 is included

Yours faithfully
Shane Butler

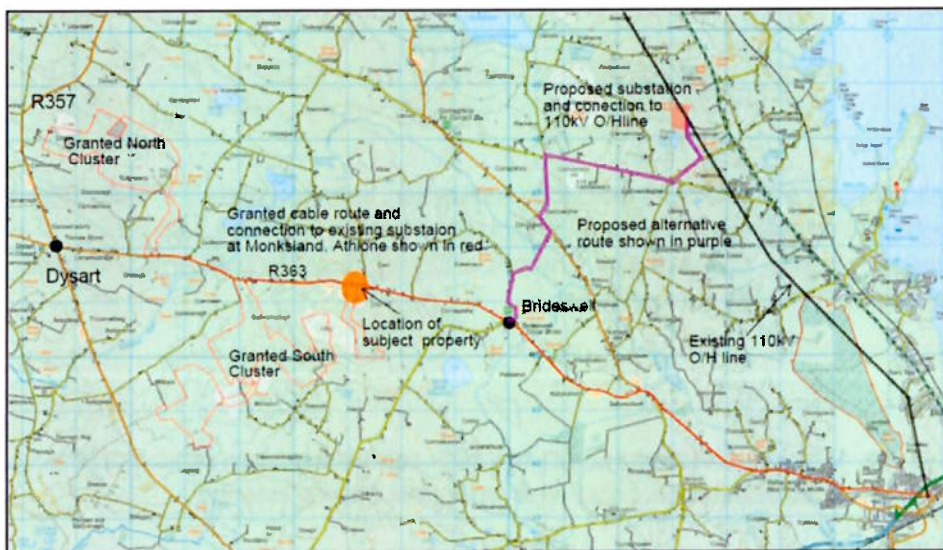


1.0 Introduction

This report was prepared for Mr. Shane Butler of Cam, Brideswell, Athlone, Co. Roscommon. It examines the potential effects on Mr. Butler's residence and surrounding garden (the subject property) of the planning permission application to An Bord Pleanála (the Board) ABP-321328-24 alone and in combination with the granted permission ABP-313750-22.

On the 23rd of Nov 2023 the Board granted Energia Developments permission, AB-313750-22, to construct a 17 turbine wind farm with a connection to the grid at an existing substation in Monklads Athlone.

On the 25th of Nov. 2024 Energia applied to the Board under s182A of the PDA for planning permission, for the development of a 110 kV electricity substation at Moyvannan, Co. Roscommon, approximately 7.5 km of underground electricity line and all associated works including a connection to the existing 110kV overhead line at Moyvannan – ABP-321328-24.



The location of the subject property, the granted and proposed developments are shown in Figure 1.

1.0 Figure 1: Site Layout (From MKO Drg. 190907-1)

2.0 Description of subject property

The home of Mr. Butler and his family is shown shaded blue in the extract from Land Direct maps – Figure 2. The subject property fronts on to the R363.

The subject property is located approx. 35m from the new access road onto the R363 granted by Board Order ABP-313750-22. Figure 3 shows an extract from the planning drawings submitted to the Board in June 2022 as part of SID application ABP-313750-22

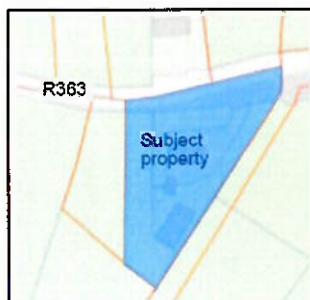


Figure 2

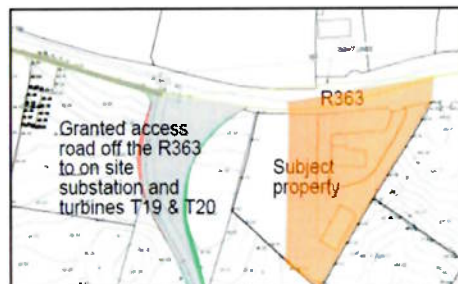


Figure 3: From MWP Drg. No. DR-C-3001 P02

3.0 Board Order ABP-313750-22 and current application

The granted development ABP-313750-22 and the proposed development ABP-321238-24 are indivisible: one will not proceed without the other. All the negative impacts of one are relevant to the other.

ABP-313750-22 Board Order Condition 1 effectively gives the applicant in ABP-321238-24 permission for two different developments on the same site and permits them to include the subject property within the permitted development site without the consent of the person who holds the legal interest in the subject site

Condition No. 1 of the Board Order states

The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, including the further information received by the Board on the 31st day of March 2023 and on the 10th day of July 2023, except as may otherwise be required in order to comply with the following conditions. (emphasis added throughout.

One result of this unprecedented grant of planning permission is that the red line planning boundary has altered as shown in Figures 4 and 5 below.



4: Drg. No. 190907-18 (07.06.22)



Figure 5: Drg. No. 190907-18 Rev A (31.03.23)

This raises a fundamental question as to how to address the cumulative impacts of the proposed development. One element that has not changed is the access new access points on the R363 granted by ABP-313750-22.

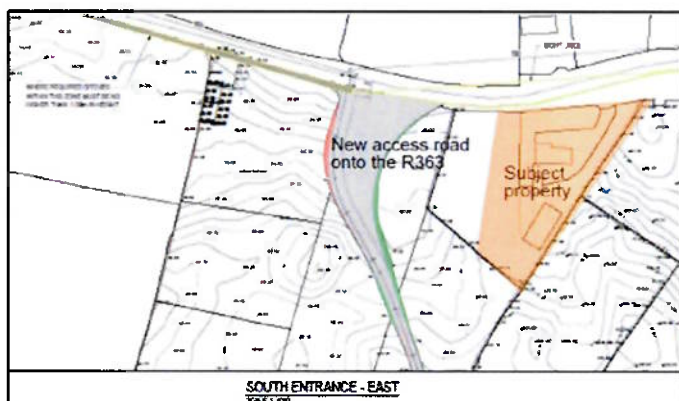


Figure 6

The access point described by Energia as South-Entrance East and shown on MWP Drg. No. 21337-MWP-WF-00-DR-C-3001Rev P0 is located approx. 28.0m west of the subject property boundary as shown in Figure 6.

The horizontal alignment of the R363 east of the access point is a very poor.

This location has been the scene of two fatal accidents in the last fifteen years

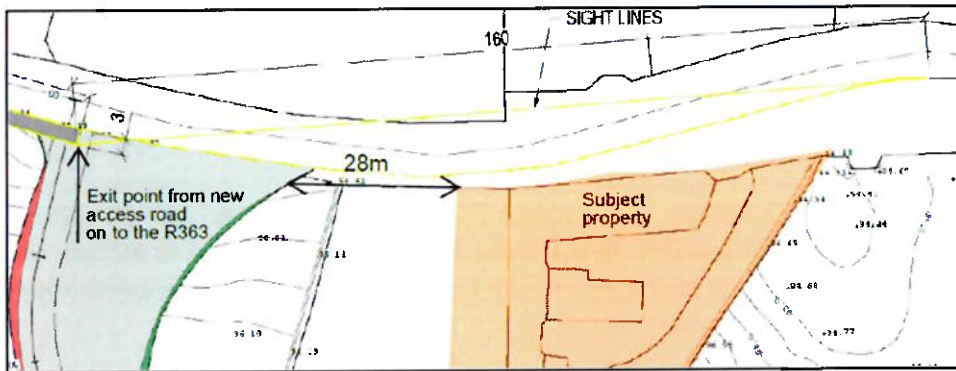
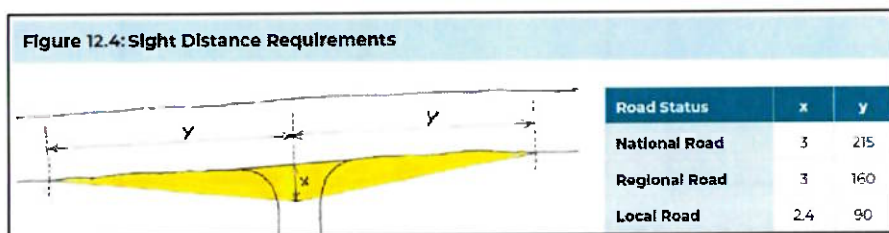


Figure 7: 160m sightline to the east - MWP Drg. No. 21337-MWP-WF-00-DR-C-3001Rev P0



Figure 8: 160m to the east of approx. location of new exit (Google maps)



If the criteria in terms of sightlines cannot be met RCC require a safety audit to be submitted to justify reductions.¹

Figure 9: RCC Development Plan 2022-2028 Chapter 12 Section 12.24

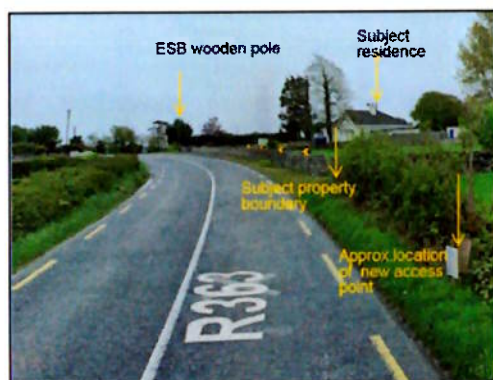


Photo 1: R363 Looking East (Google maps)

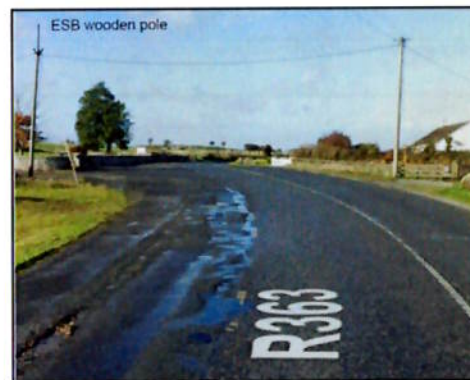


Photo 2: R363 Looking West (Google maps)

¹ RCC Development Plan 2022-2028 Chapter 12 Section 12.24



On the west bound side of the carriageway Roscommon Co. Co(RCC)semi manage the area outside the yellow dashed line in an attempt to improve the geometry of the road.

Photo 3: R363 outside subject property (Google maps)

4.0 Meeting with Applicant's representatives

Sometime in 2023 two of the Applicant's representatives visited the subject property and spoke with Mr. Butler and Ms Butler. During the conversation the representatives informed the couple that the frequency of truck movements on the access road would, on some occasions, be eight minutes apart. This caused extreme concern to Mr. and Ms .Butler in view of the proximity of the access road to their residence and in relation to the safety of their family. The couple also expressed their concerns regarding the overall development and the hazards of dust, noise and vibrations. The proximity of various elements to the residence is shown in Figure 10. The dust from the nearby Roadstone quarry can be seen in Photo 4 which was taken approx. 1.5km SW of the quarry.

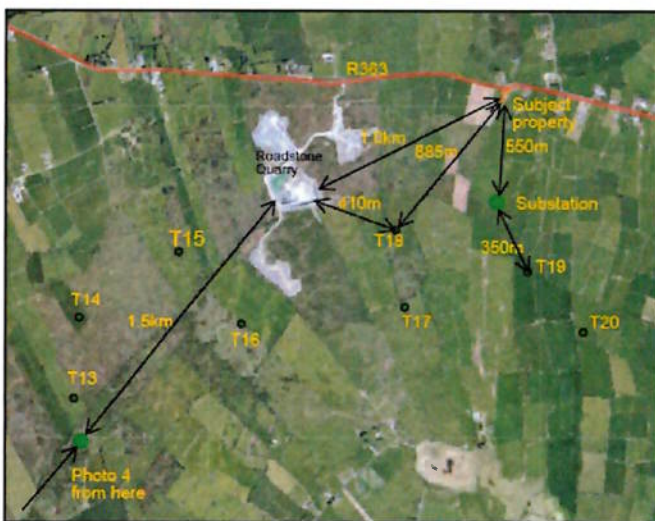


Figure 10



Photo 4

To reassure Mr. and Ms .Butler the representatives offered the following

- The planting of mature trees along the boundary of the subject property to act as a privacy screen.
- The installation of triple glazed windows throughout the residence
- A sprinkler system along the access road to suppress dust
- An assurance that access to their residence would always be maintained
- Work would not be carried out at late or early hours so sleep disturbance to their family and themselves would not be an issue.

Mr. Butler asked for these assurances in writing but has yet to receive such confirmation. Some time later one of the representatives returned accompanied by a photographer.

The granted access on to the R363 approx. 28m west of the subject property has an inadequate sightline to the east and does not comply with the RCC Development Plan 2022-2028 Chapter 12 Section 12.24.

The sightline to the east as illustrated on drawing MWP Drg. No. 21337-MWP-WF-00-DR-C-3001Rev P0 do not reflect the requirements of the RCC Development Plan 2022-2028 Chapter 12 Section 12.24.

The inadequacy of the sight lines, the frequency of heavy construction vehicle movements and the history of fatal accidents at this location means the access is unlikely to result in a positive safety audit.

Its location and use presents a real danger to road users in general but in particular to Mr. and Ms. Butler and their family.

The applicant's verbal offers to Mr. and Ms. Butler confirms their concerns as real and legitimate. The lack of confirmation in writing does not lessen that, rather it shows bad faith on the part of the applicant even before the project starts.

The local roads L2023,L7731,L2019 and the L7551 are not wide enough to accommodate the required joint boxes. The L2018 and the R363 may be able to accommodate the joint boxes but the installation will require extensive road closures. There is no location where these boxes can be accommodated in verges.

Mr. and Ms. Butler should contact the Roads section of RCC and request that they seek a safety audit from the applicant on the granted access point west of the subject property. They should also confirm that RCC are aware of the requirement of the joint bays at every 600 to 800m and request RCC's proposals for the long term maintenance of the R363 at the JB02 location adjacent to the subject property.

Rose Burke

Rose Burke BScEng. CEng.

15.01.2025