PLANNING OBSERVATION / OBJECTION

An Coimisiún Pleanála Case No: 323821

Strategic Infrastructure Development – 110 kV Substation

Applicant: Buiríos Limited

Location: Clonmore and Strogue Townlands, Co. Tipperary

Observer: Katie O'Sullivan
Resident at
E41 ND66,
Dareens,
Clonmore,
Co. Tipperary

Submitted to: An Coimisiún Pleanála

CONTENTS

SUMMARY OF APPENDICES

Appendix A – Noise & Residential Amenity (Rural & Farming Context)
This appendix examines the chronic, tonal and low-frequency noise generated by electrical substations in quiet rural environments. It explains why night-time noise is particularly intrusive in farming households where calving, animal welfare monitoring and emergency response are routine, and why continuous industrial noise represents a permanent and irreversible loss of residential amenity.

Appendix B – Rural Roads, Access, Safety & Emergency Response
This appendix explains how rural roads function as shared spaces for pedestrians, children, livestock and agricultural machinery. It demonstrates why heavy construction and operational traffic associated with the proposed development poses safety risks, restricts emergency access and disrupts normal rural and farming activity.

Appendix C – Future Dwelling Impact & Land Sterilisation
This appendix sets out how planning authorities assess rural dwellings and explains why the proximity of permanent industrial electrical infrastructure would materially prejudice the ability to secure planning permission for a dwelling on adjoining lands, resulting in sterilisation of land for residential use.

Appendix D – Agriculture, Livestock & Animal Welfare
This appendix outlines the impacts of continuous noise, artificial lighting and disturbance on livestock behaviour, welfare and productivity, particularly during calving and night-time operations, engaging statutory obligations under the Animal Health and Welfare Act 2013.

Appendix E – Ecology, Wildlife, Badgers & Habitats
This appendix details the risks to hedgerows, wildlife corridors and protected species, including badgers, arising from excavation, construction activity, lighting and permanent disturbance, and applies the precautionary principle.

Appendix F – Cumulative Impact & Planning Creep
This appendix examines the cumulative effects of incremental energy infrastructure development and explains how approval of the proposed substation would contribute to planning creep, erosion of rural character and long-term industrialisation of an agricultural landscape.

MAIN SUBMISSION – PARTS 1–19
INTRODUCTION AND OVERARCHING PLANNING HARM

This submission objects in the strongest possible terms to the proposed development. The central planning harm arises from the irreversible industrialisation of a rural agricultural area, directly opposite lands identified for a dwelling associated with ongoing farming activity. The proposal would fundamentally alter the character and planning context of the area, resulting in permanent loss of residential amenity and prejudice to future rural housing potential. In circumstances where residents are permanently tied to the locality due to farming activity and cannot reasonably relocate, these impacts are enduring, unavoidable and contrary to the principles of proper planning and sustainable development.

1. STANDING, LOCATION AND PERMANENCE
   I am a permanent resident at E41 ND66, located within approximately 300 metres of the proposed substation. My household is permanently rooted in this locality due to ongoing agricultural activity. This is not a temporary residence but a lifetime living environment. Any adverse impacts arising from this development would therefore be experienced continuously and indefinitely.

2. LEGAL TEST – PROPER PLANNING AND SUSTAINABLE DEVELOPMENT
   Under the Planning and Development Act 2000 (as amended), the Board must assess whether the proposed development constitutes proper planning and sustainable development, having regard to residential amenity, environmental protection, land-use compatibility, and the rights of third parties. Strategic infrastructure need does not remove the requirement for appropriate siting, robust assessment of impacts, and protection of rural living environments.

3. CONFLICT WITH NATIONAL AND LOCAL POLICY
   The proposal materially contravenes the Tipperary County Development Plan 2022–2028, the National Planning Framework (NPF), and the National Landscape Strategy, all of which seek to protect rural landscapes, agricultural function and sustainable rural communities.

4. INAPPROPRIATE SITING
   The proposed substation is located in open countryside with no industrial context. The applicant has failed to demonstrate that this site is necessary or that less sensitive alternatives were adequately examined.

5. CHANGE OF LAND USE
   The proposal represents a permanent and irreversible change in land use from agricultural to industrial infrastructure, fundamentally altering the character and function of the area.

6. PREJUDICE TO FUTURE RESIDENTIAL DEVELOPMENT
   The proposed development would materially and unacceptably reduce the potential for future residential development on adjoining lands, including lands directly opposite the proposed substation site which have been identified for a

family dwelling associated with ongoing agricultural activity. The planning system places significant emphasis on safeguarding the future development potential of lands for appropriate uses, particularly in rural areas where housing is intrinsically linked to farming activity and long-term land stewardship. Development which prejudices or sterilises such potential is contrary to the principles of proper planning and sustainable development. In this case, the proximity, scale, industrial character, operational noise, night-time lighting, traffic movements and visual dominance of the proposed substation would create an environment fundamentally incompatible with acceptable residential amenity standards. As a result, the likelihood of securing planning permission for a dwelling on adjoining lands would be significantly diminished, if not effectively foreclosed. This prejudice arises not from subjective concern, but from objective planning considerations routinely applied by planning authorities, including: assessment of noise and lighting environment; compatibility of surrounding land uses; quality of outlook and residential setting; long-term suitability of the site for family living. The Board is invited to consider whether it would regard a dwelling proposed directly opposite permanent industrial electrical infrastructure as providing an acceptable standard of residential amenity. It is submitted that such a conclusion would be difficult to sustain. Importantly, this prejudice is permanent and irreversible. Once the substation is established, the planning status of adjoining lands is fundamentally altered. No condition, mitigation measure or subsequent design response can restore the lost residential development potential. The proposed development therefore conflicts with sustainable rural settlement objectives by undermining the ability of local farming families to develop housing on their own lands, despite a demonstrated and legitimate need to reside permanently in the locality.

7. INTERGENERATIONAL RURAL SETTLEMENT, SUSTAINABLE COMMUNITIES AND FARMING CONTINUITY

The proposed development would undermine the long-term sustainability of the rural community and the continued viability of family farming in this area, contrary to national and local planning policy. The National Planning Framework places clear emphasis on supporting sustainable rural communities, enabling people to live and work in rural areas, and maintaining the vitality of the countryside through active land management. These objectives recognise that rural sustainability depends on the ability of farming families to remain rooted in their locality across generations. It has been the established intention, over time and subject to planning permission, that adjoining family lands would accommodate future residential development associated with the farming enterprise, thereby enabling family members to live locally, participate in farm operations, and contribute to the long-term stewardship of agricultural land. This pattern of rural settlement is consistent with development plan policies that support rural housing arising from a genuine rural-generated need, particularly where it contributes to the social and economic fabric of the countryside. The introduction of permanent industrial electrical infrastructure in close proximity to these lands would fundamentally alter their planning context. The cumulative effects of industrial noise, night-time lighting, traffic generation, visual dominance and land-use

incompatibility would materially diminish the suitability of the area for future rural housing associated with farming activity. This outcome conflicts with the objectives of the National Planning Framework and the County Development Plan, which seek to: support the continuity of rural communities; avoid the erosion of rural residential function; and ensure that development does not undermine the capacity of rural areas to sustain population and activity over the long term. The Board is invited to consider that the consequences of the proposed development extend beyond immediate amenity impacts and represent a long-term and irreversible constraint on sustainable rural settlement and intergenerational continuity. Once established, the development would permanently compromise the ability of the land to accommodate future housing associated with farming activity in a manner consistent with proper planning and sustainable development.

8. RESIDENTIAL AMENITY – LIFETIME IMPACT
   The development would introduce continuous industrial activity into a quiet rural environment. The resulting impacts include loss of tranquillity, reduced enjoyment of outdoor areas, interference with sleep and rest, and degradation of the overall living environment. Given the permanence of residence due to farming, this constitutes a lifetime loss of amenity rather than a temporary inconvenience.

9. NIGHT-TIME NOISE
   Background noise levels are extremely low at night. Continuous low-frequency and tonal transformer noise becomes clearly perceptible and intrusive during quiet periods. In a farming household, night-time is frequently associated with calving, animal welfare checks, weather events and farm security, meaning residents must remain alert and responsive. Persistent industrial noise therefore interferes both with sleep and with essential night-time farming duties. This constitutes a material planning harm in a rural receiving environment and is inconsistent with the protection of rural amenity.

10. RURAL ROAD USE
    Local roads are narrow shared-use roads used not only by vehicles but by pedestrians walking for exercise and daily activity, children, cyclists, farm machinery, and livestock movements between fields. The absence of footpaths and verges means vulnerable users must share the carriageway. Heavy construction traffic and abnormal loads associated with substation construction are incompatible with this shared rural function.

11. DAY-TO-DAY FUNCTIONING OF A DWELLING DIRECTLY OPPOSITE
    A dwelling opposite the substation would experience permanent industrial electrical infrastructure as its dominant outlook. Everyday residential activities—using gardens, allowing children to play outdoors, opening windows, enjoying outdoor seating, and general quality of life—would be compromised by visual dominance, operational noise, maintenance activity and night-time lighting. This represents an unacceptable residential environment and a fundamental land-use incompatibility.

12. LIGHTING IMPACTS
Industrial lighting would permanently alter dark rural night-time conditions. Light spill, glare and illuminated security features degrade residential amenity and change the character of the countryside. In a farming context, artificial lighting can disrupt livestock rest cycles and behaviour, and can interfere with normal night-time farming operations by altering animal movement patterns and increasing stress.

13. BIODIVERSITY AND ANIMAL WELFARE
The area supports hedgerows, field boundaries, ditches and pastureland that collectively operate as a functioning rural (ecological) network. Disturbance from excavation, trenching, noise and lighting can cause habitat fragmentation and wildlife displacement. The surrounding lands also support dairy, beef and sheep farming. Continuous disturbance, noise and lighting constitute stressors for livestock and raise animal welfare concerns.

14. EUROPEAN SITES
The site lies within the hydrological catchment of the Lower River Suir SAC. The application must demonstrate that the proposed development, alone or in combination with other plans/projects, will not adversely affect the integrity of a European site. In the absence of adequate information to exclude adverse effects, the precautionary approach requires refusal or further assessment.

15. FLOOD RISK
The site is low-lying and close to the River Suir. Flood risk, drainage, and potential pollution pathways (including sediment-laden runoff, hydrocarbons and construction materials) require robust assessment and demonstration of safety over the lifetime of the development. The submission maintains that the application does not adequately address these issues for a sensitive receiving environment.

16. CULTURAL HERITAGE
Recorded monuments and historic field patterns in the area may be affected by ground disturbance, trenching and associated works. The protection of archaeological heritage and historic landscape character is a material planning consideration and requires a precautionary approach where irreversible harm could occur.

17. CUMULATIVE IMPACT
The proposed development contributes to cumulative industrialisation of a rural landscape when considered with existing and permitted energy infrastructure. Incremental change can erode rural character, amenity and settlement capacity over time, even where individual developments are assessed in isolation.

18. FAILURE OF MITIGATION

Mitigation measures cannot resolve fundamental land-use incompatibility, amenity loss or land sterilisation where permanent industrial infrastructure is located directly opposite lands intended for rural housing. Landscaping cannot remove industrial character or eliminate operational noise and lighting. Conditions cannot restore lost development potential once the planning context is permanently altered.

19. CONCLUSION

For the reasons set out above, the development cannot be considered proper planning and sustainable development in this location. The observer respectfully requests that permission be refused, or alternatively that the development be relocated to a less sensitive site that avoids permanent harm to rural amenity, farming activity and future rural housing potential.

APPENDIX A – NOISE & RESIDENTIAL AMENITY (RURAL & FARMING CONTEXT)

A1. Purpose of this Appendix

This appendix provides a detailed assessment of the noise and residential amenity impacts associated with the proposed substation, having specific regard to its location within a quiet rural agricultural environment. It explains why noise effects that may appear limited when assessed numerically can result in significant and unacceptable impacts in rural and farming contexts, particularly during night-time periods.

A2. Existing Noise Environment (Baseline Conditions)

The receiving environment surrounding the proposed development is characterised by very low background noise levels, particularly during evening and night-time hours. The area is rural in nature, with no existing industrial activity, no continuous mechanical noise sources, and minimal traffic movements outside of farming activity. Typical baseline sounds include: - wind through hedgerows and trees, - occasional livestock movement, - intermittent farm machinery during seasonal activity, and - natural wildlife sounds. These sounds are intermittent, familiar, and form part of the accepted rural soundscape. The absence of continuous background noise is a defining characteristic of residential amenity in the area.

A3. Nature and Characteristics of Substation Noise

Electrical substations generate operational noise primarily from transformers and associated electrical equipment. This noise typically has the following characteristics: - it is continuous, operating 24 hours per day, - it often contains tonal and low-frequency components, - it is most perceptible during quiet periods, particularly at night, - it does not diminish over time and persists for the operational life of the infrastructure. Tonal and low-frequency noise is widely recognised as being more intrusive than broadband noise, particularly in quiet environments, as it is more easily perceived and more difficult to ignore.

A4. Rural Context and Sensitivity to Noise

Rural environments are inherently more sensitive to noise intrusion due to the low baseline sound levels that prevail. Noise that may be considered acceptable in urban or semi-urban locations can be distinctly intrusive in rural settings, even where measured sound levels appear modest. In this context, the introduction of a permanent industrial noise source represents a fundamental change to the existing acoustic environment, rather than a marginal increase in an already noisy setting.

A5. Night-Time Noise and Farming

Households In farming households, night-time periods are not exclusively associated with rest or inactivity. Residents are frequently required to remain alert and responsive during night-time hours due to: - calving and livestock births, - monitoring animal welfare, - responding to sick or distressed animals, - weather-related events, and - farm security and safety checks. Continuous

industrial noise during night-time hours interferes not only with sleep, but also with concentration, alertness, and the ability to respond effectively to agricultural needs. This distinguishes farming households from urban residential settings and warrants particular consideration in planning assessment.

A6. Chronic Exposure and Lifetime Impact

The proposed substation is intended to operate on a permanent, long-term basis. For residents who are permanently tied to the land due to farming activity, exposure to operational noise would therefore be daily, night-time, unavoidable, and experienced over decades. This constitutes chronic environmental exposure, rather than temporary or intermittent disturbance.

A7. Limitations of Noise Modelling

Predictive noise modelling is based on assumptions regarding operating conditions, background noise levels, and sound propagation. While such modelling may demonstrate numerical compliance with guideline values, it does not always capture tonal prominence in real-world conditions, night-time audibility during low background conditions, or cumulative effects over long periods. Reliance on post-construction monitoring or complaint-based mitigation does not address the fundamental issue of introducing a permanent industrial noise source into a sensitive rural environment.

A8. Residential Amenity Beyond Decibel Levels

Residential amenity is not defined solely by compliance with numerical noise limits. Factors such as predictability, persistence, character, and context of noise are equally relevant. The introduction of a continuous industrial sound into a previously quiet rural environment represents a qualitative change in how the area is experienced and inhabited.

A9. Planning Assessment

When assessed in the context of proper planning and sustainable development, the proposed substation would result in a permanent and irreversible loss of residential amenity arising from continuous operational noise. This impact is amplified by the rural farming context, the low baseline noise environment, and the permanent nature of residence tied to agricultural activity.

A10. Conclusion

The proposed development would introduce a continuous industrial noise source into a quiet rural farming environment where residents cannot reasonably relocate and where night-time alertness is integral to daily life. The resulting loss of residential amenity would be permanent, unavoidable, and incompatible with the protection of rural living environments. This constitutes a material planning harm.

APPENDIX B – RURAL ROADS, ACCESS, SAFETY & EMERGENCY RESPONSE

B1. Purpose of this Appendix

This appendix provides a detailed assessment of the impact of the proposed development on the local rural road network, having regard to how such roads function in practice within an agricultural community. It explains why the introduction of construction and operational traffic associated with a large-scale industrial substation gives rise to safety risks, access constraints and loss of amenity that are materially different from impacts experienced on urban or regional roads.

B2. Character of the Local Road Network

The roads serving the proposed substation are narrow rural roads with limited carriageway width, minimal or no verges, no footpaths and no public lighting. They are not designed to accommodate high volumes of heavy goods vehicles or abnormal loads. These roads evolved to serve local residents, agricultural holdings, farmyards and fields, and dispersed rural dwellings. They function as local access roads rather than transport corridors.

B3. Shared-Use Nature of Rural Roads

In rural agricultural areas, roads perform a shared function beyond vehicular movement. On a daily basis, these roads are used by residents walking for exercise and daily activity, children moving between houses and yards, cyclists, tractors and trailers, and livestock being moved between fields. The absence of footpaths means pedestrians and farm activity must share the carriageway with vehicles.

B4. Agricultural Machinery and Livestock Movements

Agricultural machinery is often wider than private vehicles, slower-moving and less manoeuvrable. Livestock movements along and across roads are a normal and unavoidable feature of rural life. These activities require visibility, patience and cooperation from other road users. The introduction of heavy construction vehicles and abnormal loads significantly increases conflict with these established uses, elevating the risk of accidents, delays and animal distress.

B5. Construction Phase Traffic Impacts

Construction would involve repeated heavy goods vehicle movements, delivery of large components, excavation plant, removal of spoil, and delivery of concrete and materials. These movements would occur over a prolonged period and would increase risk on roads not designed for such use, reduce opportunities for safe passing, force pedestrians and livestock off the carriageway, increase road-edge damage, and disrupt agricultural operations and daily routines.

B6. Operational Traffic and Long-Term Effects

Operational traffic includes maintenance and inspection access and occasional abnormal movements. While less frequent, these effects are long-term and contribute to a permanent change in how the road network is used and experienced.

B7. Emergency Access Considerations

Emergency access is critical in rural areas where alternative routes are limited and road widths restrict passing. Heavy vehicles on narrow roads increase the risk of delayed ambulance and fire service access. In farming environments, where machinery accidents can occur, maintaining reliable emergency access is essential.

B8. Amenity and Quality of Life Impacts

Rural roads form part of the living environment and are used for walking, informal recreation, access to fields and daily social interaction. Increased industrial traffic alters the character of these roads, reduces perceived safety and undermines quality of life.

B9. Incompatibility with Rural Road Function

The issue is not traffic volume alone but road function, safety and physical suitability. Where roads are constrained, reliance on management measures is insufficient to address inherent incompatibility.

B10. Conclusion

The proposed substation would introduce sustained industrial traffic onto narrow rural roads that function as shared spaces for residents, children, livestock and agricultural machinery. The resulting safety risks, access constraints and loss of amenity represent a material planning harm.

APPENDIX C – FUTURE DWELLING IMPACT, LAND STERILISATION & PREJUDICE TO RESIDENTIAL DEVELOPMENT

C1. Purpose of this Appendix
This appendix examines the impact of the proposed substation on the future residential development potential of adjoining lands, including lands directly opposite the proposed development site. It explains how planning authorities assess new dwellings in rural areas and why permanent industrial electrical infrastructure would materially prejudice the ability to secure planning permission for a dwelling associated with ongoing agricultural activity.

C2. Planning Context for Rural Housing
Assessment of rural dwellings places significant emphasis on residential amenity, compatibility with surrounding land uses, quality of the living environment and long-term suitability for family occupation. Even where rural-generated need exists, permission is not granted where environmental conditions would be unacceptable.

C3. Residential Amenity as a Determining Factor
Residential amenity includes exposure to noise, artificial lighting, visual outlook and dominance, sense of enclosure/industrial proximity and long-term living conditions. These are routinely determinative in rural housing decisions.

C4. Impact of Substation Proximity on Dwelling Suitability
A substation comprises permanent equipment, fencing, hardstanding, operational lighting and maintenance access. A dwelling opposite such infrastructure would be subject to continuous noise, lighting intrusion and visual dominance within the primary outlook, creating an industrialised setting inconsistent with rural residential living.

C5. Objective Planning Assessment
A planning authority would have to consider whether such a dwelling achieves acceptable amenity and compatibility. It is submitted that a dwelling directly opposite permanent industrial electrical infrastructure would struggle to meet these criteria.

C6. Land Sterilisation and Loss of Development Potential
The development would materially alter the planning context of adjoining lands and reduce suitability for residential development due to land-use incompatibility and amenity degradation. Once operational, the loss is permanent and irreversible.

C7. Irreversibility
As permanent infrastructure, the effects on amenity and compatibility would endure indefinitely. No condition or later design response can remove the presence, noise and lighting of the infrastructure.

C8. Sustainable Rural Settlement

National and local policy supports sustainable rural settlement where linked to farming and stewardship. Development that forecloses future rural housing potential conflicts with these objectives.

C9. Conclusion

The proposed development would result in effective sterilisation of adjoining lands for residential use by introducing permanent industrial electrical infrastructure into a sensitive rural setting.

APPENDIX D – AGRICULTURE, LIVESTOCK & ANIMAL WELFARE

D1. Purpose of this Appendix
This appendix examines impacts on agricultural activity, livestock welfare and animal management practices in the surrounding area. It explains why continuous industrial noise, artificial lighting and increased disturbance are incompatible with farming realities.

D2. Agricultural Context
Surrounding lands form part of an actively farmed rural landscape including dairy, beef, young stock and sheep. Farming operations are continuous and extend beyond standard hours.

D3. Sensitivity of Livestock
Livestock can be sensitive to unfamiliar continuous or tonal noise, which can cause stress, agitation, disrupted feeding/resting patterns, increased injury risk and reduced productivity.

D4. Night-Time Farming Activity
Night-time periods are critical for calving, monitoring vulnerable animals, adverse weather events and security. Continuous noise and lighting can interfere with farmers' ability to detect distress and safely manage animals.

D5. Artificial Lighting and Behaviour
Security/operational lighting can alter light–dark cycles, disorient animals, increase stress and alter movement patterns, particularly affecting calves and young stock.

D6. Statutory Welfare Obligations
Farmers have obligations under the Animal Health and Welfare Act 2013 to protect welfare and prevent unnecessary suffering. Development introducing avoidable stressors can interfere with meeting these obligations.

D7. Conclusion
The proposed development would adversely affect agricultural activity and livestock welfare through continuous noise, artificial lighting and increased disturbance, representing a material planning harm.

APPENDIX E – ECOLOGY, WILDLIFE, BADGERS & HABITATS

E1. Purpose of this Appendix
This appendix examines ecological impacts, with particular regard to protected species, local wildlife, hedgerows and habitat connectivity.

E2. Ecological Context
The area comprises pasture, hedgerows, field boundaries and ditches that function as ecological corridors supporting shelter, foraging and movement.

E3. Badgers and Setts
Badgers are protected. Construction involving excavation, foundations, ducting and increased activity can disturb setts, disrupt foraging routes and displace animals.

E4. Construction Phase Impacts
Excavation, noise/vibration, temporary lighting, vehicle movements and material storage can displace wildlife and damage habitats.

E5. Operational Phase Impacts
Permanent fencing, lighting and maintenance activity alter night-time conditions and can disrupt nocturnal species and movement corridors.

E6. Hedgerows and Connectivity
Hedgerows provide nesting, food and corridors. Removal, severance or illumination reduces connectivity and fragments habitats.

E7. Precautionary Principle
Where uncertainty exists as to protected species/habitat impacts, a precautionary approach is required. Permanent disturbance and lighting risks cannot be dismissed without robust surveys and mitigation.

E8. Conclusion
The development would result in disturbance to wildlife and degradation of habitat connectivity in a sensitive rural landscape, representing a material planning harm.

APPENDIX F – CUMULATIVE IMPACT & PLANNING CREEP

F1. Purpose of this Appendix
This appendix examines cumulative planning impacts when the proposed substation is considered alongside existing and permitted energy infrastructure.

F2. Cumulative Impact
Cumulative impacts arise where developments collectively erode amenity and character over time, even if assessed as acceptable individually.

F3. Incremental Industrialisation
A permanent substation in an agricultural setting contributes to a broader pattern of industrialisation and changes the identity of the area.

F4. Planning Creep and Precedent
Approval can be relied upon to justify further development, establishing precedent that the area is suitable for industrial infrastructure and reducing weight given to rural sensitivities.

F5. Erosion of Rural Character
Rural character includes low noise/light, absence of continuous industrial activity, and dominance of agricultural land use. Cumulative development erodes these characteristics.

F6. Conclusion
The proposed substation would contribute to cumulative industrialisation and planning creep, resulting in gradual erosion of rural character and amenity contrary to proper planning and sustainable development.