

FORMAL PLANNING OBSERVATION / APPEAL

To: An Coimisiún Pleanála

Re: Application Ref. ACP-324132-26

Proposed 110kV GIS Substation at Graigue, Co. Tipperary

3M

1. INTRODUCTION

This submission constitutes a **comprehensive and detailed objection** to the proposed development.

While renewable energy infrastructure is acknowledged as necessary, it must be delivered in a manner that is **plan-led, environmentally responsible, and sensitive to local context**. This proposal fails to meet those standards.

The development represents:

- An **inappropriately sited industrial installation**
- **Excessive scale within a rural landscape**
- A **cumulative intensification of infrastructure** when considered alongside the permitted solar farm and associated cabling

Taken together, this amounts to the **gradual industrialisation of the Moycarkey area**, contrary to the principles of proper planning and sustainable development.

3M

2. KARST GEOLOGY, GROUNDWATER RISK & PRIVATE WELLS

The subject site is located within a **karst limestone landscape**, which is widely recognised as one of the most **hydrologically sensitive environments**.

Karst geology is characterised by:

- Underground fissures, conduits and voids
- Rapid and unpredictable groundwater movement
- Minimal natural filtration

As a result:

Even minor contamination events can travel significant distances and impact multiple receptors.

The proposal includes infrastructure with inherent contamination risks, including:

- Transformers
- Oil containment systems
- Surface water drainage systems

There is a **clear absence of a robust, site-specific hydrogeological assessment**, particularly in relation to:

- Groundwater flow paths
- Connectivity to private wells
- Potential pollutant migration

This is a critical failure.

The surrounding area is **rural and reliant on private groundwater wells**, meaning:

- Residents depend directly on untreated groundwater
- There is **no buffer against contamination events**

Any failure of containment systems could result in:

- **Long-term pollution of drinking water supplies**
- **Irreversible public health impacts**

Given the known sensitivity of karst environments, the **precautionary principle must apply**.



3. IMPACT ON EUROPEAN SITES (HABITATS DIRECTIVE)

The site lies within the **hydrological catchment of the Lower River Suir SAC**, a designated European site.

The applicant's reliance on previous assessments carried out for the solar farm is fundamentally flawed because:

- This is a **separate project with distinct environmental risks**
- It introduces **additional pollutant pathways**
- It contributes to **cumulative impacts not previously assessed**

There is **no adequate Appropriate Assessment screening or Natura Impact Statement** that addresses:

- Groundwater connectivity
- Downstream ecological receptors
- Cumulative impacts

This represents a failure to comply with **Article 6 of the Habitats Directive**.



4. CONFLICT WITH DEVELOPMENT PLAN POLICY

The proposal is in direct conflict with key objectives of the Tipperary County Development Plan, including:

- Protection of **landscape character and visual amenity**
- Safeguarding of **water resources and groundwater quality**
- Requirement to ensure development does not result in **significant adverse environmental impact**

The Planning Authority has already identified the development as:

“a discordant feature in the landscape”

This is a significant material consideration and reinforces the unsuitability of the proposal.



5. LACK OF NATIONAL PLANNING GUIDELINES

There is a **notable absence of clear national planning guidance** governing:

- The siting of large-scale solar farms
- Associated substations and grid infrastructure

In such circumstances, decision-makers must adopt a **precautionary and plan-led approach**.

Granting permission in this instance would:

- Set a **dangerous precedent**
- Encourage **piecemeal and uncoordinated infrastructure development**
- Undermine the integrity of the planning system



6. IMPACT ON MOYCARKEY VILLAGE

The development is located in close proximity to Moycarkey village.

This raises serious concerns regarding:

- Residential amenity
- Visual intrusion
- Future growth potential

The proposal will effectively:

- **Sterilise surrounding lands**
- Restrict future residential development
- Introduce a **permanent industrial character**

This is contrary to the principles of **sustainable rural settlement and balanced development**.

3M

7. VISUAL IMPACT & ELEVATED SITE

The proposed development includes structures up to **16.5 metres in height**, located on an **elevated site**.

This significantly amplifies visual impact by:

- Increasing visibility across a wide area
- Breaking established skyline profiles
- Creating a dominant and intrusive feature

The development will:

- **Interrupt key sightlines**
- **Dominate the surrounding landscape**
- Result in **long-term visual degradation**

Proposed landscaping is:

- Minimal
- Ineffective
- Incapable of mitigating impacts, particularly in elevated views

3M

8. IMPACT ON HISTORIC MASS PATH

The proposed development directly impacts a **historic mass path**, a feature of recognised cultural heritage value.

Mass paths are:

- Historic routes used by communities prior to modern roads
- Documented on historic mapping
- Often associated with surviving features such as stiles and crossings

Irish planning decisions have consistently found that:

- The **obstruction or severance of historic paths constitutes a material loss of heritage**
- Such routes form part of the **historic landscape and cultural identity**
- Failure to identify and assess such features represents a **serious planning deficiency**

In this case, the applicant has:

- Failed to identify the mass path
- Failed to assess its significance
- Failed to provide mitigation or protection

The development will result in:

- **Obstruction and degradation of the route**
- Loss of cultural continuity
- Erosion of local heritage

This is contrary to proper planning and the **protection of cultural heritage assets**.

3M

9. EXCESSIVE SCALE & FUTURE DEVELOPMENT RISK

The site extends to approximately **4 hectares**, which is substantial.

There is insufficient clarity regarding:

- Future expansion
- Additional infrastructure
- Long-term site use

This creates a risk that:

- The development represents **only part of a larger phased project**
- The full impacts are **not currently assessed**

Such uncertainty is incompatible with proper planning.

3M

10. LACK OF COMMUNITY ENGAGEMENT

There has been **no meaningful engagement with the local community**.

Residents have been:

- Presented with a **fait accompli**
- Given limited opportunity to influence the proposal

This is contrary to best practice and unacceptable for a development of this scale.



11. CUMULATIVE IMPACT & OVERDEVELOPMENT

When considered alongside:

- The permitted solar farm
- Associated cabling infrastructure

This proposal contributes to:

- **Overconcentration of energy infrastructure**
- **Industrialisation of a rural landscape**
- Long-term environmental and visual degradation



12. CONCLUSION & REQUEST

The proposed development should be **refused permission** for the following reasons:

- Unacceptable risk to **groundwater and private wells**
- Failure to comply with **Habitats Directive requirements**
- Significant **visual and landscape impact**
- **Loss of cultural heritage** (historic mass path)
- Negative impact on **Moycarkey village development**
- **Overdevelopment and cumulative impact**
- Lack of **proper planning justification**



Signed:

Liam Shanahan.
Teresa Shanahan
Graigue,
Moycarkey,
Thurles,
Co Tipperary
E41 T6P3