
ACP case ref. VA92.324132 (Marmoris Limited, trading as Killough Solar)

From Landuse Planning <LandUsePlanning@tii.ie>

Date Fri 4/17/2026 5:31 PM

To SIDS <sids@pleanala.ie>

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TII ref. TII26-135560

Dear Sir / Madam,

Please find attached a copy of TII observations on the above Electricity Development Application.

Yours sincerely,
Michael McCormack
Senior Land Use Planner

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The Secretary
An Coimisiún Pleanála
64 Marlborough St.
Dublin 1
D01 V902

by e.mail; sids@pleanala.ie

Dáta | Date

17 April 2026

Ár dTag | Our Ref.

TII26-135560

Bhur dTag | Your Ref.

Re: Strategic Infrastructure Development Application for the proposed development of a 110kV GIS substation providing connection to the national grid via a loop in / loop out connection to the existing Killhill - Thurles 110kV Overhead line and ancillary development at Graigue, Co. Tipperary

ACP case ref. VA92.324132

Dear Sir / Madam,

The Authority acknowledges receipt of referral of the above proposed Electricity Development Application on behalf of Marmoris Limited, trading as Killough Solar. Transport Infrastructure Ireland (TII) acknowledges that the subject development proposal can contribute to achieving the national target of renewable energy generation and reduction in greenhouse gas emissions.

In that regard, TII welcomes and is supportive of proposals aimed at achieving the transition to a low carbon and climate resilient economy, increasing renewable energy generation and enhancing energy security giving effect to National Strategic Outcome no. 8 of the National Planning Framework 'Transition to a Low Carbon and Climate Resilient Society'.

Within the foregoing context, it is proposed to address the proposed development in relation to the provisions of official policy and in relation to national road network maintenance and safety to ensure the proposed development can proceed complementary to the requirements of official policy concerning maintaining the strategic capacity and safety of the national road network in accordance with National Strategic Outcome no. 2 of the National Planning Framework 'Enhanced Regional Accessibility'.

TII notes reference in the applicants cover letter to the related Solar Farm planning application permitted under planning file ref. 25/60003 and appeal case ref. PL92.323453 and advises that the Authority has no record of consultation in relation to either case.



1. Official Policy

The Commission will be aware that official policy concerning development management and access to national roads is outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

Section 2.5 of the DoECLG Guidelines sets out policy that seeks to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses (i.e. non-public road access) to national roads, to which speed limits greater than 50 kph apply.

Section 1.3.1 of the Planning and Environmental Report that accompanied the application indicates that access to the proposed substation site is achieved via the L-4106 local road to the north of the site, in the first instance, which it is stated been designed to Tipperary County Council site entrance design parameters. In that regard, the Authority acknowledges that the application documentation submitted indicates no direct access requirements to the national road network.

2. National Road Network Maintenance and Safety

Notwithstanding the above, in the Authority's opinion there are a number of operational issues related to the subject development proposal, in combination with the related planning application, that are required to be considered to address network maintenance and road safety prior to any decision on this planning application.

2.1 Proposed Substation Component Haul Route

Section 9.3.1 of the Planning and Environmental Report that accompanied the application addresses 'Abnormal Loads' and outlines that one abnormal load delivery to site is expected to form part of the development associated with the delivery of the 110kV Transformer.

A delivery route to site for the transformer unit from Belview Port via the N29, N25, N9, N24, M8 and N62 national roads is outlined.

No temporary works to the national road network are identified as being required.

Notwithstanding, in the interests of clarity, TII advises that the national road network is managed by a combination of PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities. The applicant/developer should consult with all PPP Companies, MMarC Contractors and road authorities over which the haul routes traverse to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is maintained.

TII requests referral of all proposals agreed between the road authorities, PPP Concessions and MMarC Companies and the applicant impacting on national roads. Mitigation measures identified by the applicant should be included as conditions in any decision to grant permission.

Where temporary works within any MMarC Contract Boundary are required to facilitate the transport of any abnormal loads to site, the applicant/developer shall contact thirdpartyworks@tii.ie in advance, as a works specific Deed of Indemnity will be needed by TII before the works can take place.

In the interests of clarification, any proposed works to the national road network to facilitate substation component delivery to site shall comply with TII Publications and shall be subject to Road Safety Audit as appropriate. Works should ensure the ongoing safety for all road users and prior to any development necessary licenses, approvals or agreements with the local road authorities shall be in place.

All national road and ancillary overground/underground assets shall be subject to proper undamaged reinstatement and properly certified to the relevant standards in accordance with the assets' functions together with any working widths/depths which they require.

Any damage caused to the pavement of the existing national road due to the turning movement of abnormal 'length' loads (eg. tearing of the surface course) shall be rectified in accordance with TII Pavement Standards and details in this regard shall be agreed with the Road Authority prior to the commencement of any development on site.

TII acknowledges that Section 9.3.1 of the Planning and Environmental Report that accompanied the application outlines that a permit for moving abnormal loads to the site will be sought from An Garda Síochána and the applicable local authorities on the selected route with a transportation plan for the time of delivery established prior to construction stage. Any accommodation works within the public road corridor will be carried out in advance of the delivery in agreement with the local authority. TII welcomes this commitment.

2.2 Structures

Section 9.3.1 of the Planning and Environmental Report that accompanied the application outlines that the abnormal load delivery to site associated with the transformer unit is abnormal by virtue of its dimension. However, no details of the load weight appear to be provided.

In that regard, in the interests of clarity, TII outlines the following observations for the Commissions consideration.

Any operator who wants to transport a vehicle or load whose weight falls outside the limits allowed by the Road Traffic (Construction Equipment & Use of Vehicles) Regulations 2003, SI 5 of 2003, must obtain a permit for its movement from each Local Authority through whose jurisdiction the vehicle shall travel.

With specific reference to national road structures on any proposed haul route, all structures should be checked by the applicant/developer to confirm that all the structures can accommodate the proposed loading associated with the delivery of development components to site where the weight of the delivery vehicle and load exceeds that permissible under the Road Traffic Regulations.

While an abnormal load is defined as anything above 46 tonnes and below 180 tonnes, any load above 180 tonnes, represents an 'Exceptional Abnormal Load' ('EAL'). All structures to be crossed will need a full structural assessment by the developer in accordance with TII Publications AM-STR-06048 to verify that they can sustain any 'EAL' load safely and without any damage. Reference should be made to Department of Transport Circular RW18 of 2024 ('Exceptional Abnormal Loads') in that regard.

Full details of the transportation of all Abnormal Loads and all 'Exceptional Abnormal Loads' associated with the subject development shall be agreed with all planning and road authorities along all proposed haul routes prior to the commencement of any development.

2.3 Grid Connection Routing

Connection to the national grid is detailed as being via a Loop In / Loop Out (LI/LO) connection to the existing Killhill - Thurles 110kV overhead (OH) line. Figure 1.1 of the Planning and Environmental Report that accompanied the application outlines the site extents and indicates no interactions with the strategic national road network in the area.

Notwithstanding, and in the interests of clarity, TII refers the Commission to Department of Transport Circular RW 07 of 2025 and the 'Interim Guidance to Road Authorities (placement

of Medium or High Voltage electricity assets)' and the associated update issued with Circular RW 05 of 2026, both of which can be accessed at; <https://www.gov.ie/en/publication/ece06-electricity-transmission-infrastructure-development-roads-sector-engagement-framework-interim-guidance/>.

The 'Interim Guidance', as outlined in the Circular, are issued pro tem until the development of any procedures for the planning, regulation, construction and management of Medium or High Voltage cables under public roads.

In relation to high voltage transmission infrastructure development, regard should also be had to the 'Electricity Transmission Infrastructure Development – Roads Sector Engagement Framework' included in DoT Circular RW 07 of 2025.

2.4 Greenways

In relation to any Greenway or Active Travel proposals in the vicinity of the proposed works, consultation with Tipperary County Councils own internal project and/or design staff is recommended.

Conclusion

It is requested that the above matters are taken into consideration prior to any decision on the subject application.

In the interests of clarification, no part of this submission shall be construed as TII giving consent to access or alter any national road infrastructure assets including drainage regimes, vehicle restraint and safety systems, ducting, HDD crossings, structures, etc.

In the event that any damage is caused by any development works to the national road or associated assets, overground or underground, costs arising to fully remediate all impacted infrastructure assets to TII Publications standards and requirements will be pursued by or on behalf of TII.

The Authority trusts that the foregoing comments prove of assistance to the Commission in dealing with this matter.

Yours faithfully,



Michael McCormack
Senior Land Use Planner