
Submission re ACP-324132-26 Killough Solar

From Keaveney, AnnMarie <annmarie.keaveney@tipperarycoco.ie>

Date Tue 4/14/2026 3:56 PM

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 1 attachment (822 KB)

Planning Submission to ACP -324132-26.pdf;

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A Chara,

Please find attached a copy of Tipperary County Council's submission re the above named file- due by the 22nd April.

Please confirm receipt at your convenience.

Kind Regards,
Ann-Marie

Ann-Marie Keaveney

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Comhairle Contae Thiobraid Árann
Tipperary County Council

Planning Report on proposed Electricity Development Application
in accordance with Section 182(A) of the Planning and Development Act 2000 (as amended)

April 2026

An Comisúin Pleanála Ref. No:	ACP-324132-26
Applicant:	Marmoris Limited - Killough Solar
Proposed Development:	Proposed development of a 110kV GIS substation providing connection to the national grid via a loop in/loop out connection to the already existing Killhill - Thurles 110kV Overhead line and ancillary development
Development Location	Graigie, Co. Tipperary

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The development is located at Graigue, Co. Tipperary 1.2km west of Moycarky National School. The site is accessed from the L4156-13 and beside the 110km overhead power line to which the development will connect. The substation will be set back over 500 metres south the public road. Lands surrounding the substation site are agricultural.

A solar farm was permitted on lands c.2km west of the site on 17th December 2025 by An Comisiun Pleanala (Reference PL92.323453). Permission is sought under PI Ref 2660228 for underground cabling to connect the permitted solar farm to the proposed 110kv substation and then onto the grid via the adjoining 100kv power line.

Legend

- Proposed Substation Site Boundary
- Permitted Kilgish Solar Farm
- - - Underground Interconnector Cable
- Underground Interconnector Cable within the Public Road

TITLE: Site Location

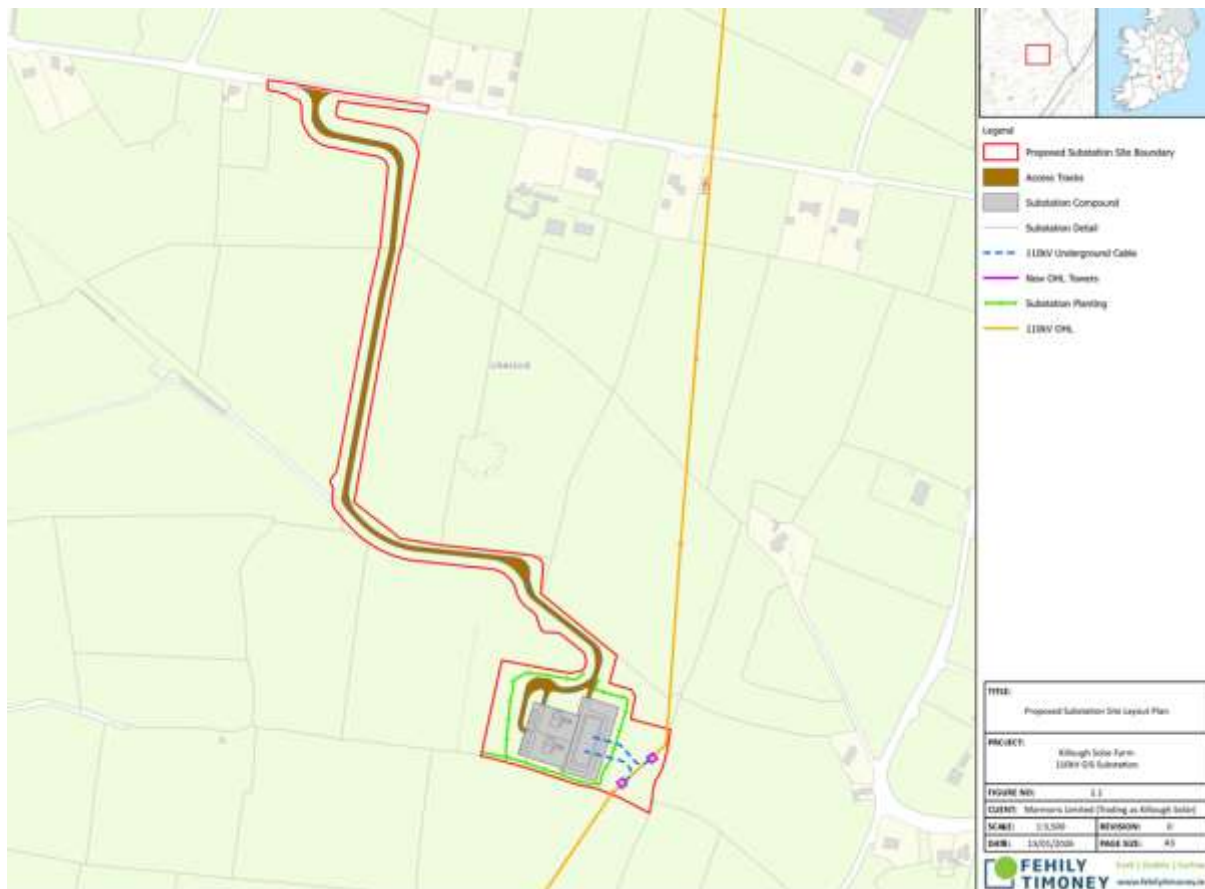
PROJECT: Kilgish Solar Farm
(19MW GTS Substation)

FIGURE NO: 1.2

CLIENT: Shiresons Limited (Owing to Kilgish Solar)

SCALE: 1:10,000 **REVISION:** 8

Figure 2 Development layout.



The Proposed Development will comprise the construction of a 110kV Gas Insulated Switchgear (GIS) substation and 'Loop In-Loop Out' (LILO) connection and associated works on a site of 4.08 hectares to incorporate the following;

- 1 no. 110 kV Gas Insulated Switchgear (GIS) Substation with a floor area of c.778sq.m, with a mono sloped roof and an overall height of 16.5m;
- 2 no. Control Buildings with a floor area of 63 sq.m each and a height of 5m.
- 2 no. 110 kV transformers and ancillary plant. • Compound fencing and 15 no. 3m high lamp poles for outdoor lighting.
- 4no. monopole lighting masts of 16.5m in height.
- 2 no. underground cable corridor of approximately 75m in length and provision of 2 no. 21.5m high mast structures linking the proposed substation to the adjacent existing overhead 110kV Killhill Thurles Over Head transmission line;
- Associated construction works, drainage and landscaping.
- New entrance to the substation site from the L4106 Local Road

PART 2. CONSIDERATIONS OF PLANNING AUTHORITY ON THE PROPOSED DEVELOPMENT

Below is a summary of the considerations of Tipperary County Council of the development against the proper planning and sustainable development of the area and commentary on items identified in the letter from An Comisúin Pleanála dated 18th March 2026.

2.1 Relevant Plan status

Relevant Plans and their status are set out below:

- Tipperary County Development Plan 2022-2028 (TCDP). This Plan came into force in August 2022. The Tipperary Renewable Energy Strategy is an Appendix to the TCDP (Appendix 2, Volume 3). The TCDP is currently undergoing a variation details of which can be found at:

[PROPOSED VARIATION NO. 1 TO THE TIPPERARY COUNTY DEVELOPMENT PLAN 2022-2028 | Tipperary County Council's Online Consultation Portal](#)

The Proposed Variation is to align the Tipperary County Development Plan 2022-2028, with the 'NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities' issued under Section 28 of the Planning and Development Act, 2000 (as amended), which were published to give effect to the National Planning Framework First Revision (2025).

- Tipperary County Council Climate Action Plan 2024-2029 (LACAP). The LACAP was made in 12th February 2024.

2.2 Development Plan Provisions and views on the proposed development

The key policies and objectives of the Tipperary County Development Plan 2022 that are relevant to the development are outlined below. Relevant policies and objectives in higher tier plans are set out in the Environmental Report that accompanies the application.

The Planning Authority note the following regarding the development:

- The proposed development forms part of a wider renewable energy development and is to provide infrastructure to connect the Killough Solar Farm to the national grid.
- The effects of the development on European Sites under the Habitats Directive was examined in the assessment of the Killough Solar Farm Development (as a whole project).
- The documentation included with the application references the local roadway as L4106. The serving local road number is L4156. The sightline requirement for this roadway is 120 metres Y distance from a set back (X distance) of 4.5 metres. Drawing P24169-FT-XX-XX-DR-PL-0504 shows sightlines from an X distance of 2.4 metres which is not in accordance with the requirements of Section 6 of Volume 3 of the TCDP 2022
- The proposed GIS Building is a large structure with a floor area of 774 sq m and height of 16.5 metres, The Planning Authority is concerned with the height and scale of this building and its impact on the landscape. The submitted photomontages provide a limited representation of the development as it would appear from local roadways and residences. Photomontage VP13b illustrates the development as a discordant feature in the landscape.

Tipperary County Development Plan 2022-2028		
Volume 1 Written Statement		
3.0 Low Carbon Society & Climate Action	3 – 1	Promote and facilitate renewable energy development, in accordance with the policies and objectives of the Tipperary Renewable Energy Strategy 2016 (and any review thereof), and the Tipperary Climate Adaptation Strategy 2019. 3-E - Support, in collaboration with stakeholders, research and innovation in smart renewable energy technologies and initiatives to accelerate diversification away from fossil fuels.
10.0 Renewable Energy and Bioeconomy	10 - 1	Support and facilitate new development that will produce energy from local renewable sources such as hydro, bioenergy, wind, solar, geothermal and landfill gas, including renewable and non-renewable enabling plant, subject to compliance with normal planning and environmental criteria, in co-operation with statutory and other energy providers. The provisions of the Tipperary Renewable Energy Strategy (and any review thereof) as set out in Volume 3, will apply to new development. 10 – A - Support the Climate Action Plan (DECC, 2019) as it relates to renewable energy production, having consideration to the strategic importance and potential benefits of renewable energy investment to rural communities. 10- C To continue to support renewable energy development and to maintain a positive framework for development through the review of the Renewable Energy Strategy over the lifetime of the Plan.
11.0 Environment and Natural Assets	11 - 1	In assessing proposals for new development to balance the need for new development with the protection and enhancement of the natural environment and human health. In line with the provisions of Article 6(3) and Article 6 (4) of the Habitats Directive, no plans, programmes, etc. or projects giving rise to significant cumulative, direct, indirect or secondary impacts on European sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans, programmes, etc. or projects⁵⁹).
	11 - 2	Ensure the protection, integrity and conservation of European Sites and Annex I and II species listed in EU Directives. Where it is determined that a development may individually, or cumulatively, impact on the integrity of European sites, the Council will require planning applications to be accompanied by a NIS in accordance with the Habitats Directive and transposing Regulations, 'Appropriate Assessment of Plans and Projects, Guidelines for Planning Authorities', (DEHLG 2009) or any amendment thereof and relevant Environmental Protection Agency (EPA) and European Commission guidance documents.

	11 - 3 Ensure the conservation and protection of existing, and proposed NHAs, and to ensure that proposed developments within or in close proximity to an existing or proposed NHA would not have a significant adverse impact on the status of the site as described. 11 - 4 (a) Conserve, protect and enhance areas of local biodiversity value, habitats, ecosystems and ecological corridors, in both urban and rural areas, including rivers, lakes, streams and ponds, peatland and other wetland habitats, woodlands, hedgerows, tree lines, veteran trees, natural and semi-natural grasslands in accordance with the objectives of the National Biodiversity Plan (DCHG 2017) and any review thereof. (b) Safeguard, enhance and protect water bodies (rivers/canals/lakes) and river walks and to provide links, where possible, to wider green infrastructure networks as an essential part of the design process. (c) Require an 'Ecosystems Services' approach for new development to incorporate nature-based solutions to SUDS, in so far as practical, as part of water management systems, public realm design and landscaping, in line with best practice. (d) Where trees or hedgerows are of particular local value, the Council may seek their retention, or where retention is not feasible, their replacement and will seek a proactive focus on new tree-planting as part of new development. 11 – 16 Facilitate new development which integrates and respects the character, sensitivity and value of the landscape in accordance with the designations of the Landscape Character Assessment, and the schedule of Views and Scenic Routes (or any review thereof). Developments which would have a significant adverse material impact on visual amenities will not be supported. 15-7 Require all new development to provide a separate foul and surface water management system and to incorporate nature-based water sensitive urban design, where appropriate, in new development and the public realm. New developments, or retrofit/upgrading works, including those contributing to combined drainage systems where streetscape enhancement programmes or resurfacing programmes are planned, will incorporate measures to reduce the generation of storm water run-off, and to ensure that all storm water generated is managed on-site, or is attenuated and treated prior to discharge to an approved storm water system, with consideration to the following: (a) Nature-Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas (water sensitive urban design) Best Practice Interim Guidance Document (DHLGH, 2001) and any review thereof, (b) The infiltration into the ground through the development of porous pavement such as permeable paving, swales and detention basis, (c) The holding of water in storage areas through the construction of green roofs, rainwater harvesting, detention basis, ponds and wetlands etc. (d) The slow-down in the movement of water.
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6.0 Policies and objectives for Renewable Energy

Policy RE1: Protection of the Environment

It is the policy of the Council that renewable energy developments and associated supporting infrastructure shall be assessed for compliance with the environmental standards and policies as set out in the County Development Plan (as varied) and the Development Management standards set out in Chapter 10.

Policy RE2: Landscape Capacity and Renewable Energy Development

It is the policy of the Council to facilitate new development which integrates with and respects the character, sensitivity and value of the landscape in accordance with the guidelines set out in the Tipperary Landscape Character Assessment 2016 and the policies as set out in the County Development Plan (as varied) and the Development Management standards set out in Chapter 10.

6.8 Solar Energy Strategy

There has been recent interest in the development of large-scale ground mounted solar PV installations. The Council will facilitate proposals for solar PV installations; subject the demonstration by the applicant that the proposal will not have a significant adverse impact on the built and natural environment, the visual character of the landscape or on residential amenity. Particular care must be taken in respect to proposals for commercial PV in Primary and Secondary Amenity Areas, where the Council may require a Visual Impact Assessment (VIA) in support of the proposal, particularly where there is potential for cumulative visual impact as a result on existing and permitted solar development in the area.

Key considerations are:

- (a) Site aspect, area and topography,
- (b) Availability and method of grid connection,
- (c) Impact on sensitive receptors including roads, residential development, areas of tourism and landscape amenity value, airfields and ecology,
- (d) The visual impact of the proposal and other permitted large-scale solar PV developments on the visual character of the area having regard to the provisions of the LCA 2016,
- (e) Management, fencing and upkeep of the site,
- (f) Construction phase activities and impacts,
- (g) Proposed lifespan of the development,
- (h) Decommissioning and reinstatement of site subject to the satisfaction of the council.

Policy RE10: Ground Mounted for Solar PV Installations

It is the policy of the Council to facilitate solar energy installations where it is demonstrated to the satisfaction of the Council that there will be no significant adverse impact on the built and natural environment, the visual character of the landscape or on residential amenity.

SO1

It is an objective of the Council to support the implementation of the targets and objectives of the White Paper for Energy 2015.

SO13

It is an objective of this Renewable Energy Strategy to support the objectives of the White Paper for Energy 2015 as they relate to energy storage as an important element of renewable energy systems in the county.

Table 2.1 Likely drivers of change and likely landscape effects

FACTOR	LIKELY DRIVER OF CHANGE	LIKELY LANDSCAPE EFFECTS			
		Uplands	Lakelands	Foothills	Plains
Infrastructure	Transportation	High	Very High	Moderate	High
	Energy - Large Transmission Lines	Very High	Very High	Moderate	Moderate
	Energy – Wind Farms	Very High	Very High	High	High
	Energy – Solar Farms	High	Moderate	Moderate	Low
	Water Services	Moderate		Low	Low

A. The Plains

Figure 3.3 The Plains, River Suir near Newcastle

These are working landscapes containing most settlements and services as well as large continuous areas used for pasture, tillage and peat harvesting. This landscape also contains major rivers and many historic sites.

Table 3.1 Derivation of Landscape Character Areas from Landscape Types and Archetypes

Archetypes	Landscape Character Types
A. The Plains	A1 Lowland Pasture & Arable This is the most common type of landscape in Tipperary. It consists mainly of grasslands and tillage enclosed by hedges. These areas also contain areas of woodlands, rivers and settlements – as well as a dense network of roads, utility lines and farm buildings. The character and appearance of these areas can be significantly different depending on proximity to other landscapes such as uplands and hills.
	A2 Peatlands & Wet Mixed Farmland This type of landscape occurs in separate compartments within the plains. There is a lower intensity of farming in these areas – resulting in fewer houses and roads and more areas of natural vegetation.



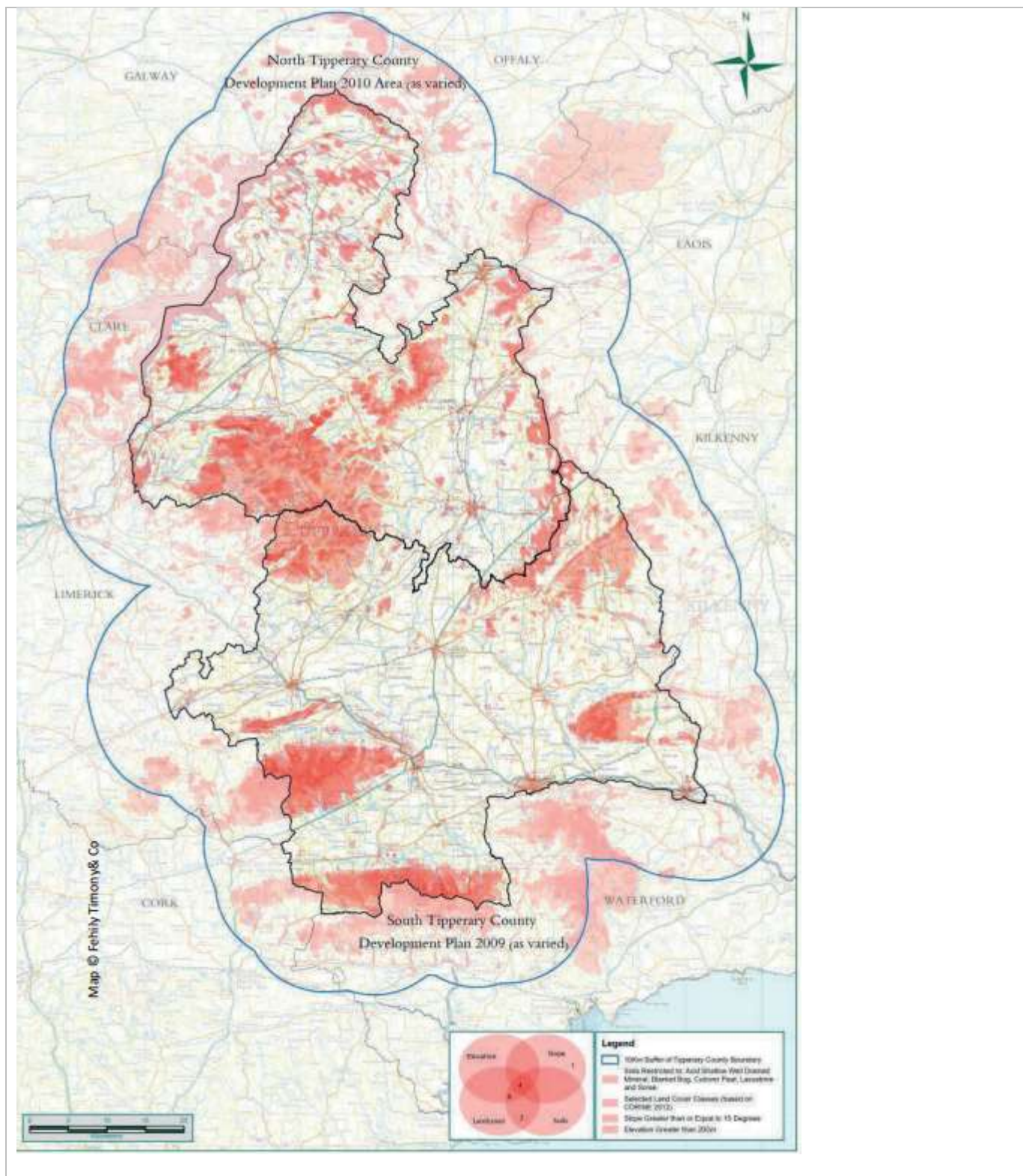
Thurles Hinterland

Table 3.2 Derivation of Landscape Character Areas

Archetypes	Landscape Character Types	Landscape Character Areas
A. The Plains	A1 Lowland Pasture & Arable	1. Urban and Fringe Areas
		2. Thurles Hinterland
		3. Nenagh Corridor
		4. River Suir Central Plain / Nenagh Corridor
		5. Templemore Plains
		6. West Tipperary Farmland mosaic
	A2 Peatlands & Wet Mixed Farmland	7. Borrisokane Lowlands
		8. Littleton Raised Bog
		9. Littleton Farmland Mosaic and Marginal Peatland



River Suir Central Plain



Landscape Types	Principle Landscape Character Areas	Sensitivity Class	Objectives	Guideline
A1 Lowland Pasture & Arable	1. Urban and Fringe Areas	0	Improve	Encourage development that will improve the appearance and character of the area.
	2. Thurles Hinterland	1		
	3. Nenagh Corridor	1		
	4. River Suir Central Plain / Nenagh Corridor	1	Continue	Facilitate development that continues established patterns of use and settlement
	5. Templemore Plains	1		
	6. West Tipperary Farmland mosaic	1		

6.2 LAND-USE COMPATIBILITY BETWEEN LCAs AND LAND-USE TYPES

Table 6.2 Land-Use Compatibility between LCAs and Land-Use Types

Compatibility Key		Sensitivity Class	AGRICULTURE AND FORESTRY		HOUSING	URBANISATION			INFRASTRUCTURE	EXTRACTION		ENERGY	
			Agriculture	Forestry		Urban Expansion	Industrial Projects	Tourism Projects		Sand/Gravel	Rock	Windfarm ²	Solar
Most													
High													
Medium													
Low													
Least													
Landscape Character Areas													
1. Urban and Fringe Areas		0											
2. Thurles Hinterland		1											
3. Nenagh Corridor		1											
4. River Suir Central Plain / Nenagh Corridor		1											
5. Templemore Plains		1											

Volume 3 Appendix 6 Development Management Standards

6.0 Parking, Traffic & Road Safety

6.1 Road Design & Visibility at a Direct Access

A direct access is a vehicular access from any residential, commercial or agricultural property to and from a public road. New direct accesses shall not be permitted within 90m of the exit of a roundabout on a national road, or within 50m of the exit on a non-national road.

Any direct access to a rural national primary or rural national secondary road shall comply with the visibility parameters contained in Section 5.6.3 of TII Publication DN-GEO-03060, Geometric Design of Junctions, which is available for download from the TII Publications website (<https://www.tiipublications.ie/>). Any direct access to an urban national primary or national secondary road shall comply with the visibility parameters contained in Section 4.4.5 of the Design Manual for Urban Roads published by the Department of Transport, Tourism and Sport, which is available for download from the following website (<https://www.gov.ie/en/publication/3360b1-design-manual-for-urban-roads-and-streets/>).

On all national and non-national roads, the full 'Y – Distance' shall be to an object height of 1.05m above the road surface level measured at the near edge of the travelling lane (the yellow line, or if none exists, the edge of the paved surface). Forward visibility equal to the Y-Distance shall also be provided along the public road on the approaches from each side of an access.

The distance back along the minor road or direct access from which the full visibility is measured is known as the 'X-Distance'. It is measured back along the centreline of the minor road or direct access from the continuation of the line of the nearside edge of the paved surface (including hardstrip or hard shoulder) of the major road. The 'X-Distance' on the minor road for visibility measurements shall be as defined in Table 6.1 below.

Table 6.1: X-Distance Requirements

Major Road Use	Minor Road use/Direct Access	X-Distance
National Roads	Simple Junctions, Stop control	2.4m
Regional & Local Roads	All junctions and accesses, Stop control	2.4m
Regional & Local Roads	All junctions and accesses, Yield control	3.0m
National Roads, Regional & Local Roads	Multiple residential, Commercial, Agricultural or other	4.5m
Regional & Local Roads	Accesses lightly trafficked (single residence)	2.0m

For direct access to a non-national road, the same principles apply as for national roads. Where posted mandatory speed limits are provided the design speeds and associated Y-Distances in Table 6.2 shall apply:

Table 6.2: Design Speeds and associated Y-Distances

Mandatory Speed Limit	Design Speed (operational Speed)	Rural Non-National Road	Urban Non-National Road
km/h	km/h	Y-Distance (m)	Y-Distance (m)
30	40	N/A	33
40	50	70	45
50	60	90	59
60	70	120	72
80	85	160	N/A
100	100	215	N/A

On non-national roads, in cases of particular difficulty, the use of a lower design speed for a given mandatory speed limit (as set out in table 6.2) may be accepted by the Council. In such a case, the applicant must demonstrate to the satisfaction of the Council that the 'operational speed' of the road is less than the specified design speed. In such cases, the Council may accept the use of the lower speed than identified in column 2 of Table 6.2 above.

6.1.1 Measuring 'Operational' Speed

The operational speed shall be determined by measurement of actual speeds between 07:00 am and 07:00 pm over a period of three days, excluding weekends or public holidays. It represents the 85th percentile speed of the traffic travelling on that section of road during that period. The 85th percentile speed is the speed at or below which 85% of the traffic is travelling.

As an alternative, the applicant may use the methodology described in Section 10.2 of TII publication DN GEO 03031: Rural Road Link Design to determine a design speed based on the physical characteristics of the road section.

The minimum design or operating speed that will be allowable under any circumstances for a rural non-national road shall be 50kph, and for an urban non-national road it shall be 40kph. The Council's decision on the appropriate design or operating speed shall be final.

2.3 Planning History

Relevant Planning history for the lands are set out below.

On Site and adjoining
2660228 - Permission sought for laying of underground cables to connect the permitted Killough Solar PV development to a proposed 110kv substation (RED III Development).
Nearby lands
ACP-323453-25 (Council File Reference 2560003)-Permission granted for a Solar farm on lands 2k west of the proposed substation site.

2.4 Relevant designations

The site is within the drainage catchment of the Lower River Suir SAC and Cabragh Wetlands pNHA

2.5 Landscape/ Visual

The proposed GIS building, given its, height and form, is considered to be a discordant feature in the landscape.

2.6 Community Gain

The Planning Authority will rely on An Comisuin Pleanala to address matters of community gain.

2.7 Roads/Traffic

The site entrance onto the L4156 must demonstrate sightlines in accordance with the requirements of the Tipperary County Development Plan 2022. The sightlines demonstrate are not in accordance with Development Plan requirements.

2.8 General Contributions

Development contributions are payable under the Tipperary County Council Development Contribution Scheme 2020 under the following Class;

Class	Description	Rate
19	The provision of overhead and/or underground distribution lines for the distribution of electricity and/or telecommunications inclusive of transmission lines to grid connection	€10 per metre distribution lines

In the event of a grant of permission Tipperary County Council request An Comisuin Pleanála to attach conditions for the payment of development contributions in line with the Tipperary County Council Development Contribution Scheme 2020

Signed: 

Date: 30/3/2026

Senior Executive Planner

Signed: 

Senior Planner

Date: 02/04/2026

Signed: 

Director of Services

2.4.2026

Date: