

Catherine Brittain,
Graigue,
Moycarkey,
Thurles,
Co Tipperary.
E41 NX79
085 1477729.

cathorion@hotmail.com

20/04/2026

The Secretary,
An Coimisiun Pleanála,
64 Marlborough Street,
Dublin 1.
D01 V902

AN COIMISIÚN PLEANÁLA	
LDG-	057435-26
ACP-	
21 APR 2026	
Fee: € 50	Type: C.A.V.
Time: 11:36	By: H.C.M.

CASE REFERENCE: VA92.324132

LOCATION: TOWNLAND OF GRAIGUE, CO TIPPERARY.

PROPOSED DEVELOPMENT OF A 110KV GIS SUBSTATION

With reference the above Planning Application I wish to make a Submission under the following headings

- 1- Road naming discrepancy between Cabling Route Application and Substation Application.
- 2- Location of Substation.
- 3- Size of Substation.
- 4- Interference with My Right Of Way.
- 5- Total absence of Consultation with residents of Moycarkey Village and homeowners.
- 6- Devaluation of Private Property Values.
- 7- Indemnity Bond.

I WISH TO REQUEST AN ORAL HEARING RE. THIS PLANNING APPLICATION.

Regards

Catherine Brittain
Catherine Brittain

**1- ROAD IDENTIFICATION DISCREPANCY BETWEEN CABLING ROUTE
AND SUBSTATION APPLICATIONS.**

The first Planning application for the Cabling Route (to connect to Substation Location) Tipperary Co Council Planning Ref: 2660202, submitted 05/03/2026 was deemed invalid by the County Council (letter dated 09/03/2026) due to Incorrect Road Number use i.e. The L-4106.

A new revised Application was submitted, Tipperary Planning Ref: 2660228, to Tipperary County Council on the 12/03/2026 amending the Road Reference Number to the correct Reference number L-4156 (including the Entrance to proposed Substation Location).

The Planning Application to An Coimisúin Pleanála for the Substation has referenced to the road Number L-4106.

As this Road number and first Application (Tipperary Co Council Ref: 2660202) was deemed Invalid by Tipperary County Council and in the Interest of Proper Public Record keeping and avoiding confusion now and in the future, this Application should be rejected and also deemed Invalid by the ACP in its current form.

(See Sheets 1, 1A, 1B Copy of Tipperary Co Council letter re. Invalidation of Tipperary Planning ref: 2660202 for ease of reference)

2- LOCATION OF SUBSTATION.

The location of the Proposed Substation is currently at a distance of c470m from Moycarkey Village and would be in a direct eyeline for homeowners living in the village and close by.

In the Planning Application for the Killough Solar Farm (Tipperary Co Council Planning Ref 2560003, and Comisiun Pleanala Planning Ref 323453) the then proposed location for the Substation (Field 22) was set further away from Moycarkey Village and homeowners and not in the direct eyeline of private homeowners or Moycarkey Church or the Parish Hall.

See Sheet number 2 showing Table of distances to the now proposed Substation Position and the First Proposed SUBSTATION (Field 22) and Moycarkey Village and homeowners.

See also Sheets number 3 and 3A attached, maps showing the original proposed location of Substation and how it has been moved closer to Moycarkey Village and homeowners.

See Sheet number 4 for a visual representation of a typical 110 kV GIS Substation.

See Sheets numbers 5 and 6-10 containing photos and location of where photos were taken from, to illustrate the direct sight lines from my home to the permanent and Forever Structure i.e. The Substation.

Mitigation Measure-

- 1) A Co-location of the Proposed Substation within the site of the Killough Solar Farm, which the Substation is being proposed to facilitate.

OR

- 2) Return the location of the proposed Substation to Field 22 which would lead to
 - A safer Distance from Moycarkey Village , Parish Hall and residents.
 - An improvement in the direct sight lines and reduction of Visual Pollution for Moycarkey Village and homeowners directly affected by what will be a permanent and forever feature in our neighbourhood and Landscape.
 - The first proposed location (Field 22) would also give a more direct line of access from the proposed permanent entrance on the L4156 for emergency vehicles and maintenance and upkeep of the Substation.

3- SIZE OF SUBSTATION.

The proposed Development will include the following

- The 110 kV Gas Insulated Substation will have a floor area of c778 sq.m
Height = 16.5m
- The Control Buildings, of which there will be two
Floor Area = 63 sq.m
Height = 5m
- Two no 110kV transformers and ancillary plant
- 4 Monopoles lighting masts Height = 16.5m high
- 15 X outdoor lighting poles Height= 3m high

See Sheet number 4 for a visualisation of what this will look.
(It is akin to a 5 story building)

This will cause Visual Pollution to Moycarkey Village and the homeowners who live nearby and would be in direct eyeline of people who live nearby.

Because of the size and Visual Impact alternate locations should be seriously looked at AS

This is a Forever Structure and cannot be removed or relocated at a later time,
WE HAVE ONLY ONE CHANCE TO GET THE LOCATION RIGHT.

The South Tipperary County Development Plan 2009, as varied, is the Statutory Development Plan Policy ED9

- a) The Development shall not have an adverse impact on the Residential, Environmental and rural amenity of the area
- b) Any new structure shall be of a scale appropriate to the size of the site , and be Sited and designed to ensure it does not detract from the Rural setting and landscape of the area.

4- DISRUPTION OF MY RIGHT OF WAY.

Right of way registered on Co Tipperary Land Register Folio Number 13076F, copy attached for reference, See Sheet number 11.

(Note : Parts of the page has been blocked out to protect the privacy of other people referenced on the same page)

Right of way extends to a Draw Well location of which is shown on attached map, See Sheet number 12.

The proposed Access Road for the proposed Substation goes through the Draw Well Location and would interfere with my Right Of Way and destroy it as a potential source of water if needed.

5- TOTAL ABSENCE OF CONSULTATION EITHER PUBLIC OR PRIVATE.

The residents of Moycarkey Village and nearby homeowners have not been offered or Given any chance to engage with the Developers, at any stage, with regard to this Development.

This despite the fact that the proposed Substation would be within c227.59m of dwelling homes.

This has caused serious levels of stress and Mental Health Issues.

We know Isolation causes Mental Health Issues and in regard to this proposed Development Moycarkey Village and nearby homeowners have been victims of 'Consultation and Information Isolation'.

Planning and Development (Renewable Energy) Regulations 2025(Ned 111)
-Irish Transportation (S.I. No 402 of 2025) Updated
Public Consultation required.

The requirement to engage with communities was not fulfilled in this Planning and Development Process.

6- EFFECT ON PROPERTY VALUES.

The opinion of 3 different and Independent Auctioneers and Estate Agents, when asked for their opinion re the effect on house valuations and nearby Substations, was the same.

There would definitely be a reduction in value of private home and maybe as much as 20%.

Alternative locations for this proposed enormous (akin to 5 story building) Substation should be looked for, in consultation with residents of Moycarkey Village and nearby homeowners for a suitable solution for all, including Developers.

Relocation to Field 22 would mitigate this somewhat and would also change the direct sight lines between homeowners and Substation.

Again see Sheets 2,3,4,5 for illustration.

Having it Co-located with Killough Solar farm and within same site would also mitigate for these negative Effects.

The Proposed location for the Substation is an elevated site relative to Moycarkey Village and nearby homes making the effect on Property Valuation more significant due to Sightlines being more evident.

7- INDEMNITY BOND.

An Indemnity Bond should be lodged by the Developer to compensate homeowners against potential damage to property during construction and operation.

Also to compensate for any devaluation of property values.

Conclusion: Whereas we all appreciate the need for Renewable Energy, I feel it should be achieved in a way that recognises the Local Communities, Local Villages and Local residents where ever this is possible.

With regard to this Planning Application there are other options for the Substation Location Site.

Tipperary County Council

**PLANNING & DEVELOPMENT REGULATIONS 2001 (as Amended)
ARTICLE 26 NOTICE**

Planning Ref. No: 2660202

Notices (Newspaper/Site)

- Incorrect road number indicated on public notices. L-4106 indicated, correct reference is L-4156 as per Tipperary County Council GIS mapping system.

Application Form

- Q9 indicates incorrect road number, correct reference is L-4156.
- Q19 indicates incorrect pre-planning reference number.

Fee

Incorrect fee submitted. Correct fee is:

Class 13. $3.23 / 0.1 = 32.3 \times \text{€}10 = \text{€}323.00$

Advice

- Please ensure correct landowner consent letter is uploaded with application.
- Public road number does not need to be stated on public notices.

Please note the above may not be an exhaustive list and any subsequent application will be assessed on its own merits.

Ref ACP Case VA92.324132
(For information only.)

SHEET 1



Comhairle Contae Thiobraid Árann
Tipperary County Council

Comhairle Contae
Thiobraid Árann,
Oifigí Cathartha,
Cluain Meala,
Co. Thiobraid Árann
Tipperary County Council,
Civic Offices, Clonmel,
Co. Tipperary
E91 N512

Comhairle Contae
Thiobraid Árann,
Oifigí Cathartha,
An tAonach,
Co. Thiobraid Árann
Tipperary County Council,
Civic Offices, Nenagh,
Co. Tipperary
E45 A099

t 0818 06 5000
e customerservice
@tipperarycoco.ie
tipperarycoco.ie

Ref:2660202

Date: 09/03/2026

Marmoris Limited, Trading as Killough Solar,
C/o Anthony Ryan
Core House
Pouladuff Road
Cork
T12 D773

A Chara,

With reference to your application for PERMISSION for The Renewable Energy Development (RED III) will consist of; laying of underground 33kV medium voltage electrical cables, 6 no. joint bays, with associated ducting and ancillary development. The cables will be laid under public roads and private lands within the townlands of Clohoge and Graigue Co. Tipperary, with c. 860m within the L-4106 and c. 540m within the L-41561 public road and c. 1,092m located on private agricultural land within the townland of Graigue. The underground cable is intended to connect the permitted Killough Solar Farm, approved by Tipperary County Council (Pl. Ref. 2560003), and An Coimisiún Pleanála (Ref No. 323453-25), to a proposed 110kV Gas Insulated Switchgear (GIS) substation, which will be subject to a separate application for consent to An Coimisiún Pleanála. Temporary alternative access to residential properties on the L-41561 will be provided during the laying of the cable, provided by an existing access track on lands in the townland of Graigue which will connect to the future access track associated with the substation site, allowing direct access to the L-4106 from the L-41561 for the duration of the construction period. A Natura Impact Statement (NIS) will be submitted to the Planning Authority with the Application. Permission is sought for a period of 10 years at Townlands of Clohoge and Graigue, County Tipperary received on 05/03/2026 I am to inform you that your application is invalid and does not constitute a valid planning application. It is invalid due to the reasons detailed on the enclosed Notice.

Arrangements have been made to refund your application fee. To enable you to prepare your new application you can clone this one on <https://planning.localgov.ie/>

You are advised that any valid planning application will be subject to a Completeness Check in accordance with Section 34D of the Planning and Development Act 2000, as amended.

SHEET 1A

Mise le meas.

Patricia McCormack
for Director of Services

Tipperary Planning Authority - Inspection Purposes Only

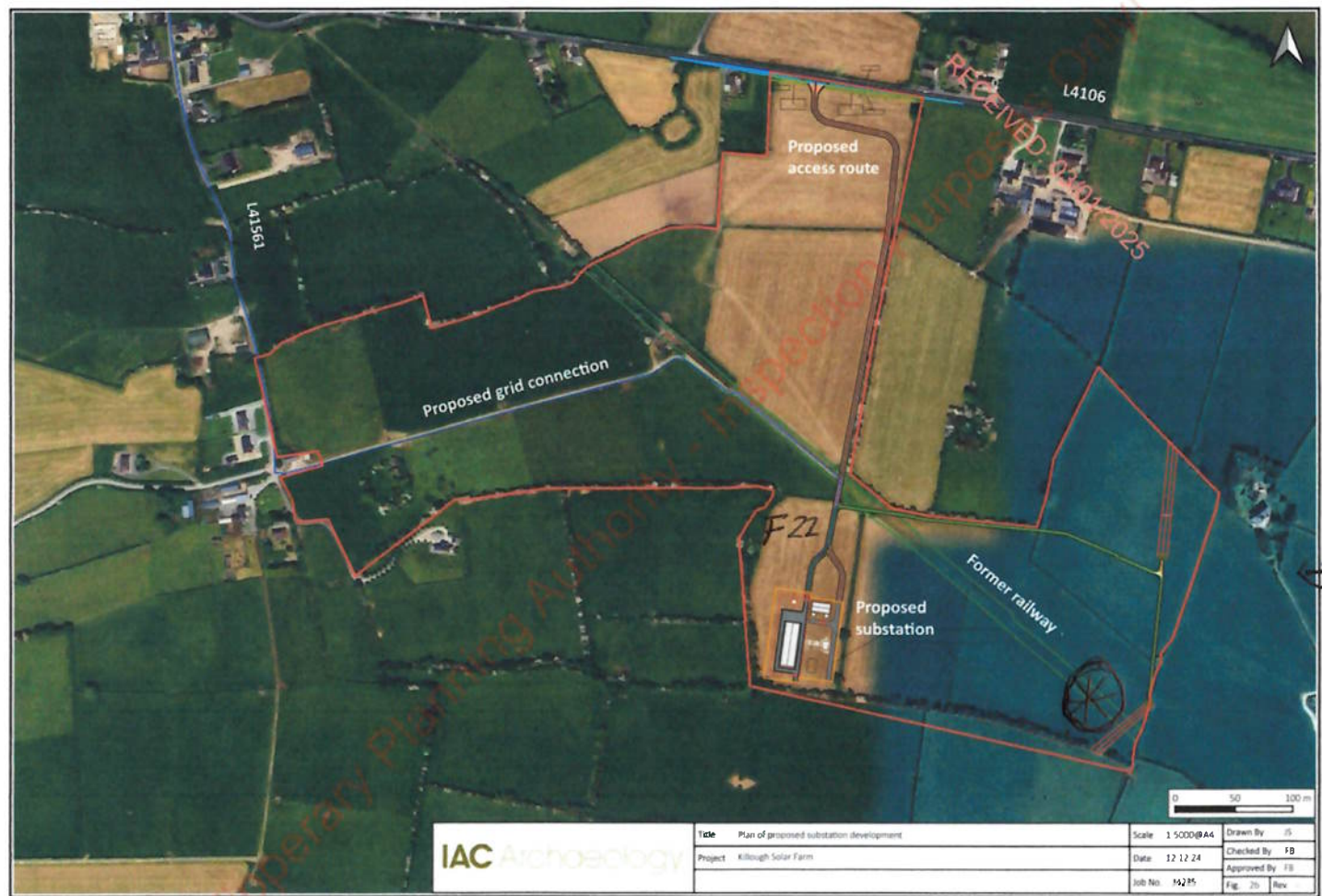
SHEET 1B

Re Tipperary County Council Planning Application Ref: 2660228

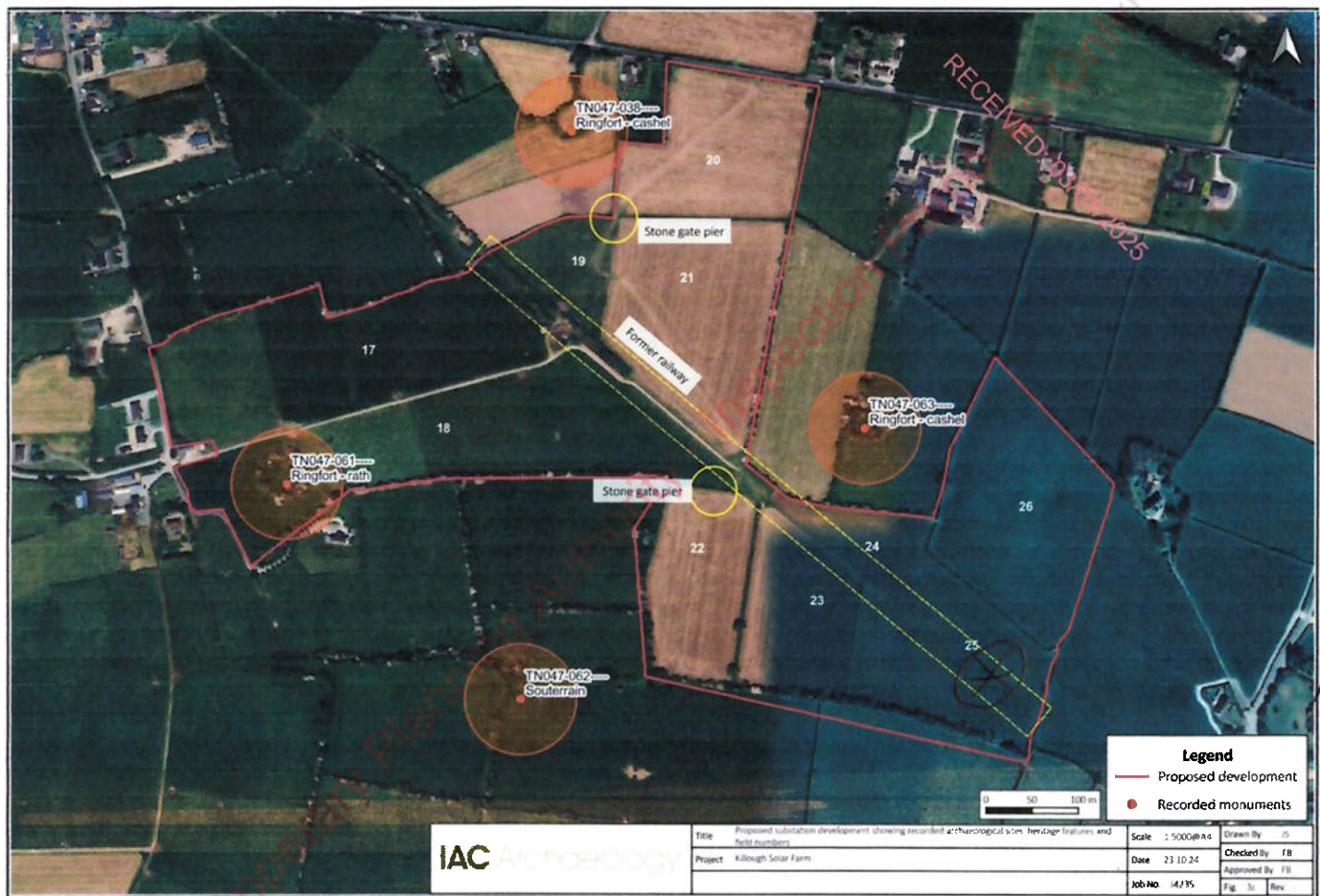
DISTANCES BETWEEN ORIGINAL AND NEW END POINT OF CABLING ROUTE AND
HENCE SUBSTATION LOCATIONS AND PRIVATE DWELLINGS

<u>Dwellings Ref</u>	<u>Distance from Original proposed Substation Location.</u>	<u>Distance from Revised proposed Substation Location</u>
<u>Moycarkey Village Parish Church. St. Peters</u>	<u>805.91m</u>	<u>478.99m</u>
<u>Property A</u>	<u>548m</u>	<u>227.59m</u>
<u>Property B</u>	<u>670.7m</u>	<u>349.54m</u>
<u>Property C</u>	<u>502.5m</u>	<u>369.11m</u>
<u>Property D</u>	<u>699.94m</u>	<u>436.45m</u>
<u>Property E</u>	<u>403.46m</u>	<u>231.7m</u>
<u>Property F</u>	<u>369.21m</u>	<u>503.04m</u>
<u>Property G</u>	<u>828.57m</u>	<u>503.74m</u>

Original proposed Substation site to new proposed Substation site MOVED 365m CLOSER to Moycarkey Village and residential properties.



⊛ New Proposed Location of Substation
 F. 22 First Proposed location of Substation



Moyraethy Village

(*) New Proposed Location of Substation
Field 22 Was First Proposed Location of Substation

PHOTO 13

SHEET 7

* Proposed Substation location & Height
from my kitchen window
if Direct Sight line



Reg ACP Case : VA92.324132)

SHEET 4



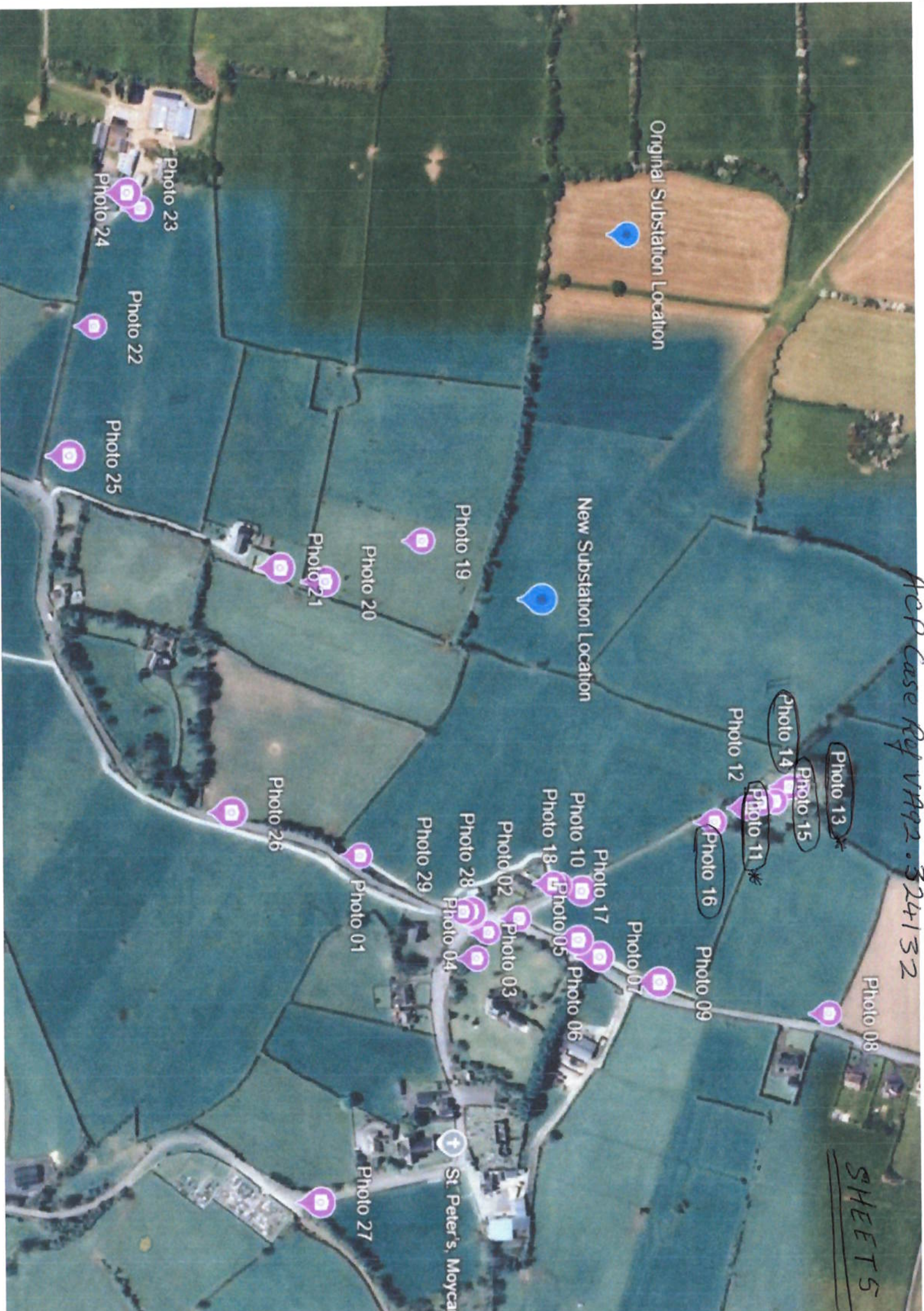
Figure 2-1: Typical 110kV GIS Station Layout (Source: H&MV)

Visual Representation

SHEET. 4

ACP Case Ref VHA92.324132

SHEETS



Original Substation Location

New Substation Location

Photo 23
Photo 24

Photo 22

Photo 25

Photo 19

Photo 20

Photo 21

Photo 26

Photo 01

Photo 27

St Peter's, Moycar

Photo 12

Photo 14

Photo 13

Photo 15

Photo 11

Photo 16

Photo 09

Photo 08

Photo 07

Photo 17

Photo 10

Photo 05

Photo 18

Photo 02

Photo 06

Photo 28

Photo 04

Photo 29

PHOTO 11

* Substation Proposed
Location & Height
Direct Sight line from front of my house

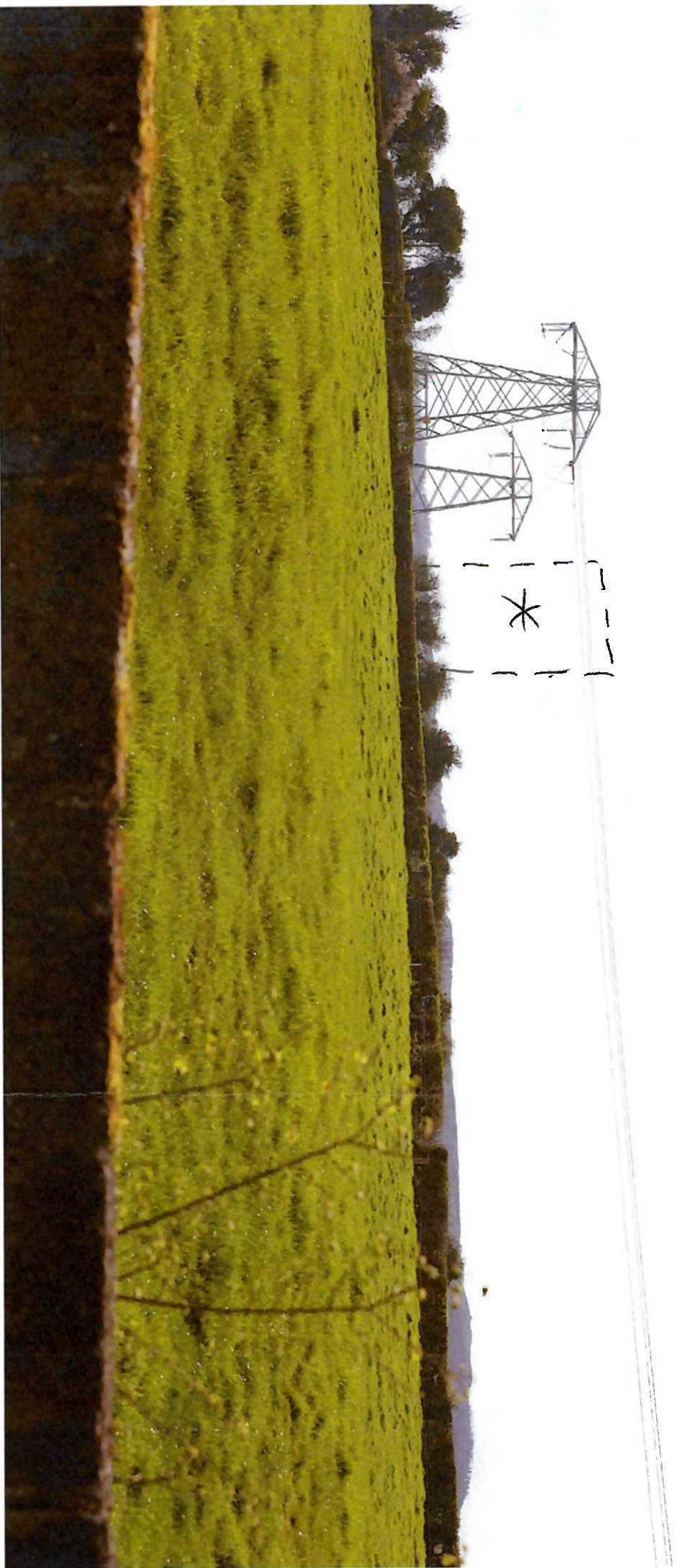


PHOTO 14

SHEET 8

Direct Sight line
from inside my home

Substation
*



SHEET 9

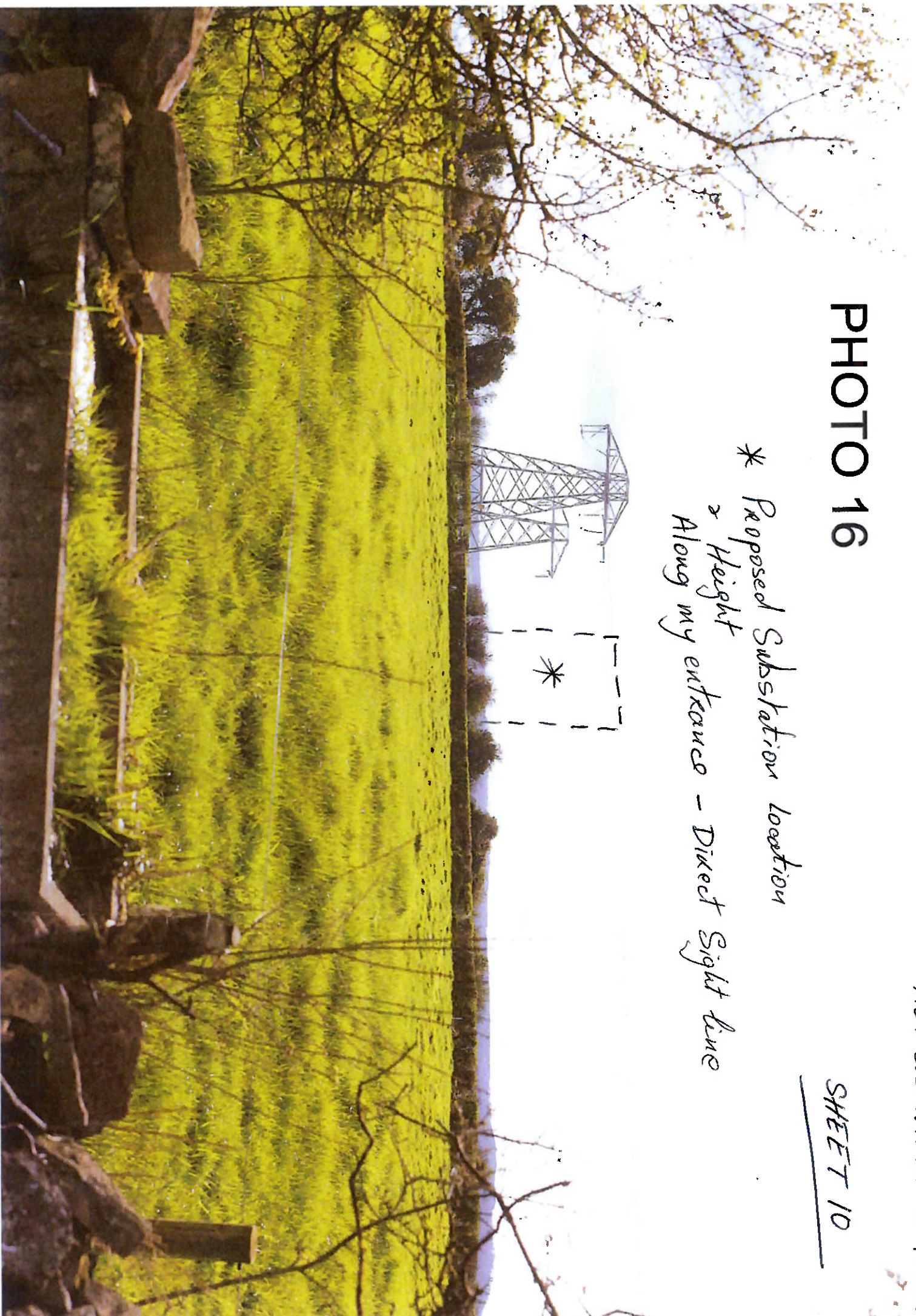
PHOTO 15



PHOTO 16

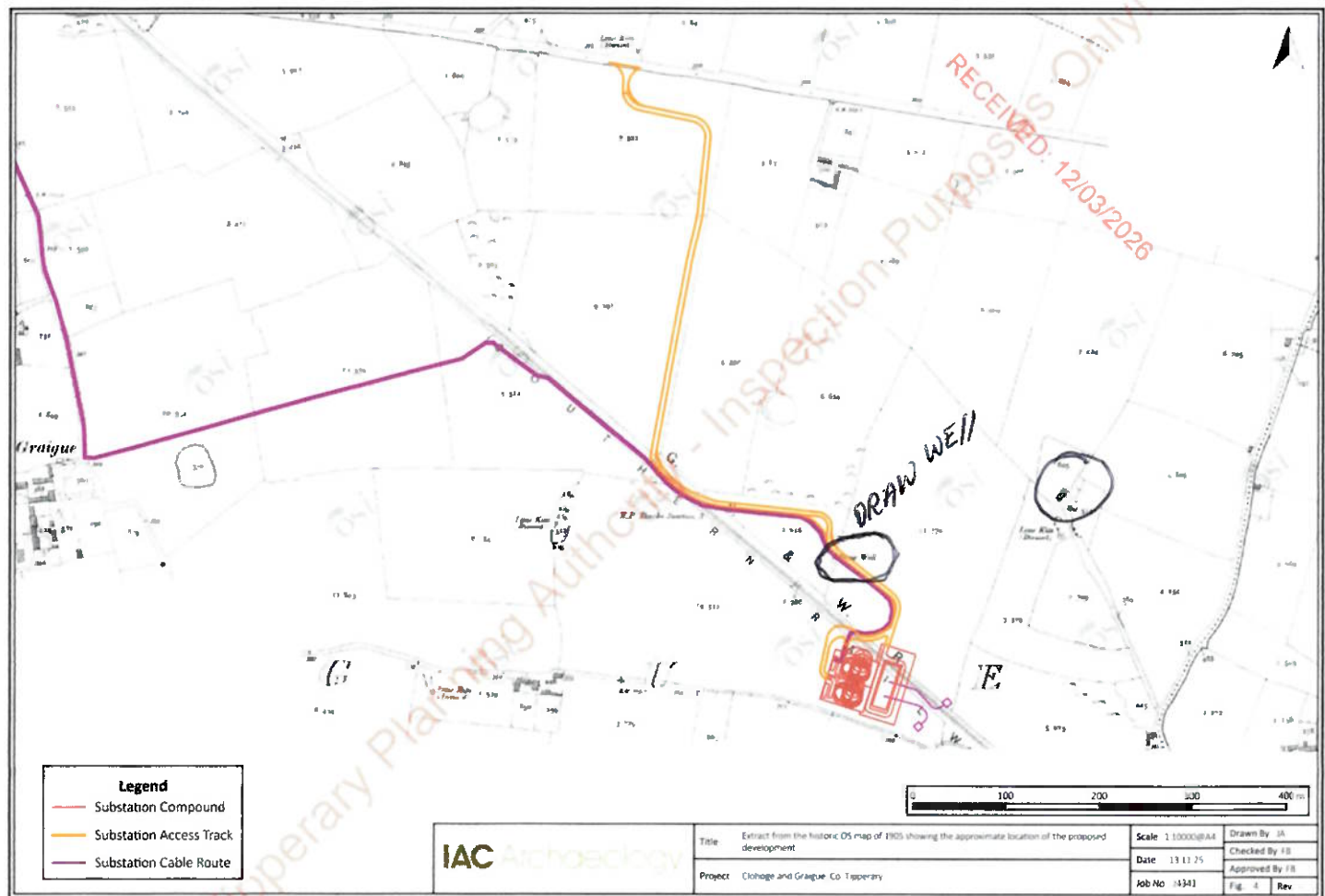
SHEET 10

* Proposed Substation location
x Height
Along my entrance - Direct Sight line



Land Registry**County Tipperary****Folio 13076F****Part 3 - Burdens and Notices of Burdens**

No.	Particulars
3	03-MAR-1988 T1436/88 The right of Vivian Brittain and Catherine Brittain the registered owners of Folio TY14987F County Tipperary their administrators, successors and licensees of passage at all times for all purposes with or without vehicles of any description and animals of any description by the ways shown coloured yellow on Plan 16117_2 on the Registry Maps. The description of the land affected by the above right is as set out on the Registry Map. In the event that the above entry includes lettering or other alpha numeric references as part of the description of the subject lands, where such lettering or alpha numeric references are not now shown on the Registry Map, the description on the Registry Map prevails and is deemed to be the description of the affected property for the purposes of the Registration of Deeds and Title Acts 1964 and 2006. Description revised. See Rule 8(4) and D2014LR131355M.



MAP SHOWING POSITION OF DRAW WELL AND
PROPOSED ACCESS ROAD TO PROPOSED SUBSTATION
SITE