

OBSERVATION SUBMISSION Strategic Infrastructure Development Application To: An Coimisiún Pleanála Re: Proposed 110kV GIS Substation and Associated Works Applicant: Marmoris Limited (trading as Killough Solar) Location: Graigue, County Tipperary On behalf of: Jim Ryan, Mill Road, Thurles, Co Tipperary. Date: 20/04/2026 Case Reference: VA92.324132

1. I wish to submit this observation in respect of the proposed 110kV Gas Insulated Switchgear (GIS) substation at Graigue, County Tipperary. While recognising the importance of national energy infrastructure and the transition to renewable energy, I have serious concerns regarding the location, scale, and cumulative impacts of the proposed development, particularly given its proximity to Moycarkey Village and surrounding residential areas.

2. Proximity to Moycarkey Village and Residential Context The proposed development is located in close proximity to Moycarkey Village and established residential properties. Concerns include:

- Inappropriate siting of large-scale electrical infrastructure adjacent to a rural settlement
- Conflict with the existing residential character
- Insufficient separation between strategic infrastructure and the community

3. Scale and Dominance Relative to Village and Dwellings The development is excessive in scale relative to:

- Moycarkey Village
- Nearby homes and agricultural holdings

Structures up to 16.5 metres in height will:

- Visually dominate the area
- Be disproportionate to the surrounding built environment
- Introduce a strong industrial character

4. Elevated Site and Visual Impact The site occupies an elevated position approx. 4 metres above Moycarkey village. No proposals outlined to help mitigate this visual impact e.g. Tree screening. Impacts include:

- High visibility across the landscape
- Skyline intrusion from lighting masts and structures
- Significant long-range visual effects

This results in a prominent and intrusive development within a rural setting.

5. Conflict with County Development Plan and Settlement Strategy The proposal conflicts with key objectives of the Tipperary County Development Plan, including:

- Supporting sustainable growth of rural villages
- Encouraging residential development within settlements
- Protecting residential amenity

Potential impacts:

- Restriction of future expansion of Moycarkey Village
- Reduced attractiveness for residential development
- Undermining long-term planning strategy

6. Property Devaluation There are concerns regarding:

- Devaluation of nearby residential properties
- Reduced desirability of the area

This reflects a broader impact on residential amenity and community wellbeing.

7. Lack of Community Consultation The community considers that:

- Meaningful engagement did not take place
- Residents were not adequately consulted

Given the scale of the project, early and transparent engagement should have been undertaken.

8. Alternatives and Site Selection There is insufficient evidence that alternative sites were properly considered. Key concerns:

- Why co-location with the permitted Killough Solar Farm was not pursued
- Why proximity to existing infrastructure (e.g., 110kV line at Ballytarsna) was not prioritised

A robust alternatives assessment is required.

9. Flood Risk and Surface Water Moycarkey has been identified historically as an area of flood risk, including:

- References in the Tipperary County Development Plan (2010)
- Local knowledge of flooding events (1960s and 1970s)

Concerns include:

- Increased runoff due to significant concrete infrastructure
- Alteration of drainage patterns
- Potential downstream flooding impacts

10. Health Considerations and Fire Safety The proximity of high-voltage infrastructure raises concerns regarding:

- Potential health impacts
- Public perception and stress
- Fire safety – local fire station knowledge and means to deal with fires on site.

A precautionary approach should be applied in siting such infrastructure near homes.

11. Lighting Impact The proposal includes significant lighting infrastructure:

- 15 lamp poles
- 4 high mast lights (16.5m)

Impacts:

- Light pollution
- Impact on residents and wildlife
- Loss of rural dark sky environment

12. Future Greenway Impact Concerns exist regarding:

- Impact on potential Greenway development
- Reduced recreational and tourism value

The development may

conflict with future amenity and tourism objectives. 13. Cumulative Impact The development must be assessed alongside:

- The permitted Killough Solar Farm
- Associated infrastructure

This represents:

- A significant intensification of development
- Gradual industrialisation of a rural landscape

14. Conclusion and Request Moycarkey Community Association respectfully requests that An Coimisiún Pleanála:

- Carefully assess the appropriateness of this location, particularly given its proximity to Moycarkey Village
- Require a comprehensive and transparent alternatives analysis
- Fully consider the impact on residential amenity and future village expansion
- Reassess visual, landscape, lighting, and cumulative impacts
- Ensure that flood risk and surface water management are robustly addressed
- Give due consideration to health concerns and community wellbeing

Oral Hearing Request In addition, given the scale, complexity, and potential long-term impacts of the proposed development, together with the level of community concern, Moycarkey Community Association formally requests that an Oral Hearing be convened under the Planning and Development Act 2000 (as amended). An Oral Hearing would:

- Allow for a full and transparent examination of the issues
- Enable direct engagement between the applicant, the Board, and the community
- Ensure all concerns are properly explored and tested

Given the significance of the proposal and its potential impact on Moycarkey Village, an Oral Hearing is considered necessary in the interests of proper planning and sustainable development

Signed: Jim Ryan