

An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902
Date: 21st April 2026.

Planning Application Reference Number 324132-26
An Coimisiún Pleanála - Case Reference: VA92.324132

Applicant Name: Marmoris Limited Trading as Killough Solar.

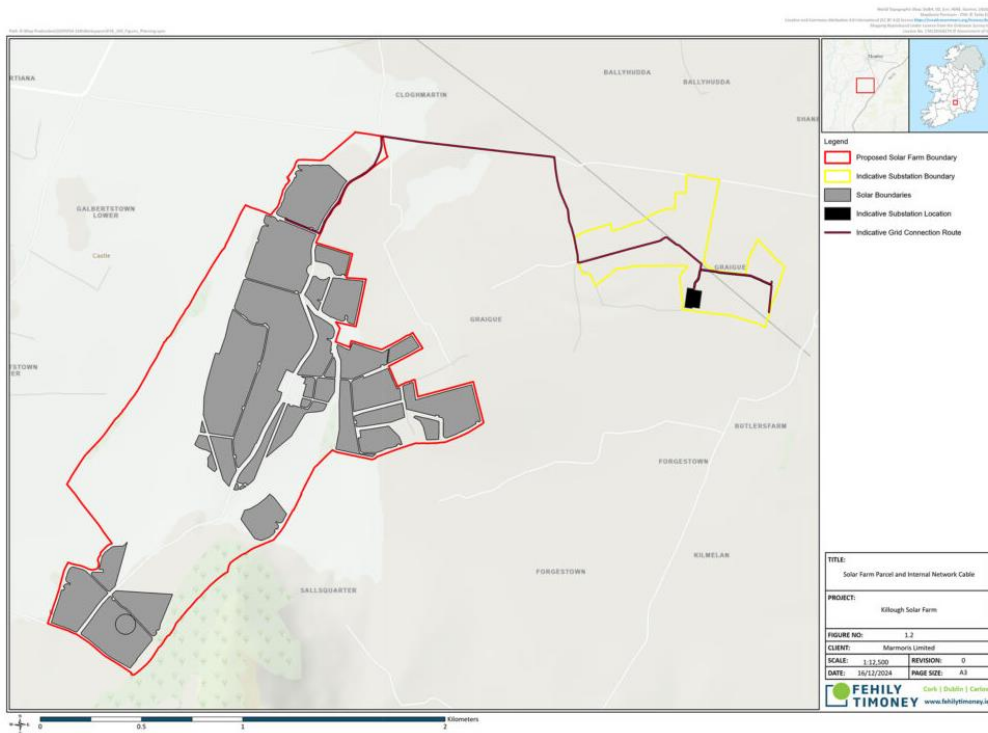
Description of Development: Proposed development of a 110kV GIS substation providing connection to the national grid via a loop in/ loop out connection to the already existing Killhill - Thurles 110kV Overhead line and ancillary development.

To Whom It May Concern,

As residents of Moycarkey village, living within 200 metres from the proposed substation site, we have reservations about the proposed development with respect to the impact this development will have on our residential amenity, the life and character of the village, the heritage and biodiversity of the surroundings of Moycarkey Village and its sustainability in the future.

Our observation is as follows:

1. Location of Substation:



The plans shown on the left shows the original location of the substation on the planning application for the solar farm.



The map shown on the left shows the proposed location of the substation.

Plate 12-1: Cable Route and 110kV Substation Site

Grounds for Observation:

- It is concerning that Moycarkey village is not meaningfully addressed in the planning application, beyond a reference to the electoral district, despite the proposed substation being located within 390 metres of the village, and in close proximity to St Peter's Church.
- As can be seen from the images above at the time planning permission was granted for the solar farm, the substation was identified in a different location to that now proposed. The location appears to have moved approximately 300 metres closer to the village.
- The proposed development represents a substantial industrialisation of a rural landscape currently characterised by agricultural land use, open countryside, and low-density development.
- At a community consultation held with a TD in October 2025, the issue was raised as to why the substation cannot be co-located within the proposed solar farm.
- There is no evidence in the application that genuinely alternative sites were assessed. The relocation appears limited to adjustments within the same landholding rather than a comparative site selection process.
- In our view, the proposal does not demonstrate that this is the most suitable or least impactful location for this type of infrastructure, particularly given the availability of alternative options that appear not to have been properly explored.
- We believe the current proposal would have an unnecessary and avoidable impact on local residents and does not represent proper planning and sustainable development.
- The introduction of large-scale electrical infrastructure, associated buildings, perimeter security fencing, lighting, and increased vehicular movements would materially alter the established rural character and visual amenity of the area.
- By introducing an industrial-scale structure into a rural setting, the proposal would diminish the overall quality and attractiveness of the area and hinder any future development of the village. Under the most recent county development plan the council is encouraging housing inside speed zones.
- The proposed substation site is about 3.5 km from an active quarry, and this is a concern because blasting at the quarry can cause ground vibration and air pressure waves that may affect sensitive equipment and structures. Because of this, the site presents a real and avoidable risk to the safe operation of the substation, and this risk has not been properly addressed.

2. Size and Visual Scale of the Substation:



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

Grounds for Observation:

- The comparison of the proposed substation to a 'large farm shed' is misleading. A 110kV substation is an industrial installation in both scale and function and bears no resemblance to typical agricultural structures in the area.
- The proposed substation (Figure 2-1: above) would be an industrial-scale development placed within a rural field and cannot reasonably be compared to a typical farm shed.
- Despite references to existing and proposed hedgerows, such screening would take years to establish and would not adequately conceal the scale or visual impact of the structure in the interim. This locality is closely monitored by Birdwatch Ireland and Cabragh wetlands, due to the unique and special biodiversity of species in the area, and removing hedgerows will be detrimental to the safeguarding of protected bird and bat species.
- The introduction of a large, engineered facility clad in so-called 'natural' or 'earthy' materials does not negate its fundamentally industrial appearance, which would be out of keeping with the surrounding countryside.
- While acoustic insulation and 'stringent noise limits' are referenced, the presence of external transformers raises legitimate concerns regarding continuous low-level noise, which can significantly impact residential amenity and rural tranquillity. The proposal therefore risks introducing visual intrusion and persistent noise into what is currently a quiet, agricultural landscape. Furthermore, electromagnetic pulses and vibrations from the substation will prove a nuisance to local residents. Substations can produce a low-frequency hum and vibrations that may be perceived as a nuisance by residents, especially in our quiet, rural setting in Moycarkey Village.

- A structure measuring 16.5 metres in height is comparable to a five-storey building and is therefore significantly out of scale with the surrounding rural dwellings and typical farm buildings in the area.
- The Tipperary County Development Plan 2024–2029 highlights that a key consideration in site layout is the protection of neighbouring amenities. Furthermore, Figure 8 of the same document emphasises that developments should, where possible, complement the existing landscape. While this document is presented as a rural housing design guide, the underlying principles regarding scale, visual impact, and integration into the landscape should reasonably be applied to all forms of development, including infrastructure such as substations.
- The proposed palisade fencing appears to function solely as a security measure. In addition, a 1.5-metre-high boundary fence is proposed externally. However, both rail structures remain visible beyond the screened enclosure, which undermines the effectiveness of the purported visual mitigation measures.
- The proposed 3-metre-high lamp posts for external lighting, as indicated on drawing P24169-FT-XX-XX-DR-PL-0600, appear to include two light fixtures per pole, directed towards the 16.5-metre-high substation structure. This arrangement is likely to result in light reflecting off the building, contributing to increased levels of nighttime visual intrusion and light pollution within a rural setting.
- Such impacts would be particularly pronounced during the winter months, when longer periods of darkness in the mornings and evenings would exacerbate these visual effects.
- Such a transformation risks establishing a precedent for further industrial-type development on lands that are neither zoned nor intended for such purposes, thereby undermining the integrity and policy objectives associated with the rural environment.
- The proposed 21.5m high overhead line towers, in combination with the existing 17.0m structures, would form a visually dominant and intrusive feature in the landscape, resulting in a substantial obstruction of views and an erosion of the area's open rural character.
- There is a discrepancy between the application documents and the accompanying drawings, with the former referring to 4 Nr 16.5 m high monopole lighting masts and the latter identifying these structures as lightning masts. This inconsistency requires clarification.

3. Insufficient Information on Possible Future Development:

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PROJECT NAME: Killough Solar Farm SID Application
SECTION: Planning and Environmental Report



1.4 Operational Life

Once completed, the proposed 110kV GIS Substation will be transferred to EirGrid, and will form a part of the National Transmission Network and therefore will operate in a **perpetuate state**.

While the application relates to a 110kV substation, the supporting documentation indicates that the proposed development may form part of a broader, longer-term installation within the national transmission network.

Grounds for Observation:

- There is insufficient clarity as to whether the proposal has been designed to accommodate future expansion, additional infrastructure, or increased capacity.
- There is a significant concern that the site could be subject to incremental expansion over time, without a comprehensive assessment of the cumulative impacts on the surrounding area. Such impacts may include effects on visual amenity, noise levels, and traffic generation.
- It is essential, in the interests of proper planning and sustainable development, that the full extent of the proposed development — including any reasonably foreseeable future expansion is clearly defined, assessed, and subject to appropriate environmental evaluation at this stage.
- The scale of the proposed 110kV GIS substation appears disproportionate to the operational requirements of the permitted solar farm. This raises legitimate concerns that the infrastructure may be designed to facilitate additional future grid connections. Consequently, questions arise regarding the adequacy of the environmental assessment and whether the cumulative impacts of the overall development have been properly identified, assessed, and mitigated.

4. Inconsistency in Baseline Data (Number of Receptors)

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10.2.2 Socio-economic and the Local Population

The townlands comprising the proposed substation development site is situated within the Moycarkey ED, which has a total population of c. 768 persons (c. 367 males and c. 401 females), according to Census 2022 results, providing for a high population density of c. 45 persons per square kilometre, when compared to County Tipperary as a whole which has an overall population density of c. 39.52 persons per square kilometre.

There are no significant recreation features or tourist attractions in the immediate area surrounding the Proposed Development. However, Holycross GAA club is located c. 3.4km west of the Solar Farm site, with Holycross Abbey located c. 2.4km west of the Solar Farm site.

The Eircode Address database was examined to establish the number and location of adjacent residents and commercial activities. There are no receptors within the substation site, and a further 41 no. receptors within 500m of the subject lands which consist of c. 48 no. residential, c. 8 no. commercial and residential properties and c. 1 no. commercial property.

The majority of residences located to the north west of the substation site along the L-4106 and L-41561 roads on the north west of the proposed 110kV GIS substation site.

Grounds for Observation:

- The documentation states that there are 41 nearby properties (receptors) located within 500 metres of the site. However, the breakdown provided appears to identify approximately 48 dwelling houses, 8 mixed-use buildings (comprising residential and commercial use), and 1 commercial property. This gives a total of approximately 57 properties, rather than 41, and therefore presents a clear inconsistency in the figures relied upon in the assessment.
- As no adequate explanation is provided as to whether these categories overlap, whether certain properties have been grouped together, or whether some receptors have been excluded from the total, it appears that the overall number of nearby properties may have been reported incorrectly. This is a significant matter, as the reliability of the environmental assessment depends on the accuracy of the baseline data. If the receptor numbers are incorrect, the conclusions reached in relation to potential impact may likewise be unreliable.
- Accordingly, the applicant should be required to provide a corrected and verified total number of nearby properties, together with a clear explanation of the methodology used to classify and count each receptor.

(Excerpt from the planning application)

11.3.4.1.2 110kV GIS Substation

The main construction activities associated with the construction of the proposed 110kV GIS Substation are set out in Table 11-3. Table 11-3 also sets out the predicted noise levels at locations where the highest noise levels are predicted from the proposed Substation works. The nearest noise sensitive locations to this activity are R81, a property located c. 200m east of the proposed substation. Also presented is R118, which is located c. 680m north of the proposed substation and close to the site entrance of the substation. Assuming all activities occur simultaneously for each phase, the highest predicted noise levels during substation works are 56 dB $L_{Aeq,1hr}$ and 53.8 dB $L_{Aeq,1hr}$ at receptors R81 and R118, respectively. This is below the proposed construction daytime noise threshold of 65dB $L_{Aeq,1hr}$. The effects associated with the construction of the 110kV GIS substation are predicted to be moderate, negative and short-term in duration.

- This statement appears to directly conflict with earlier sections of the documentation which indicate that there are no receptors within 500 metres of the site. If a noise-sensitive receptor is identified at approximately 200 metres from the proposed substation, then the earlier description of the receiving environment is clearly inaccurate or incomplete.

5. Landscape and Visual Impact:

Although the planning application contains a Visual Impact Assessment with photomontages, it notably omits viewpoints from the village of Moycarkey and residential properties most directly impacted by the proposed substation. This represents a significant deficiency, as it fails to accurately assess the true visual impact of residents in the village.

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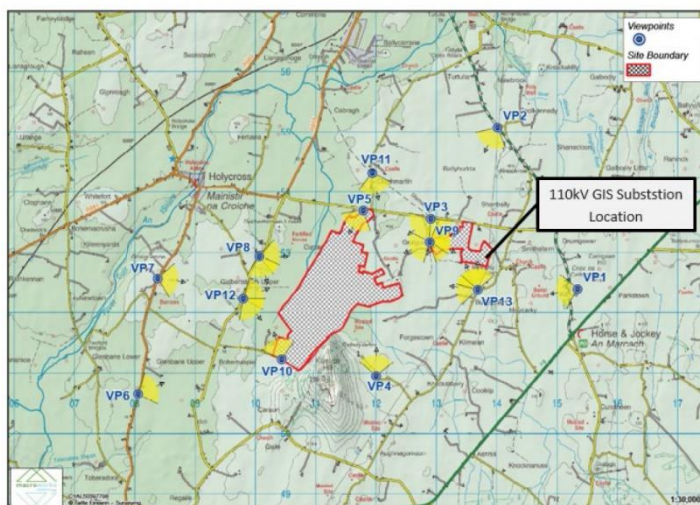


Figure 13-1: Viewpoint location map (showing viewing extents and direction of view)

Grounds for Observation:

- No visual impact assessment has been provided from Moycarkey village or from the approach roads leading to the village, where there are direct lines of sight to the proposed substation site.

Photos below represent the views we believe were omitted.

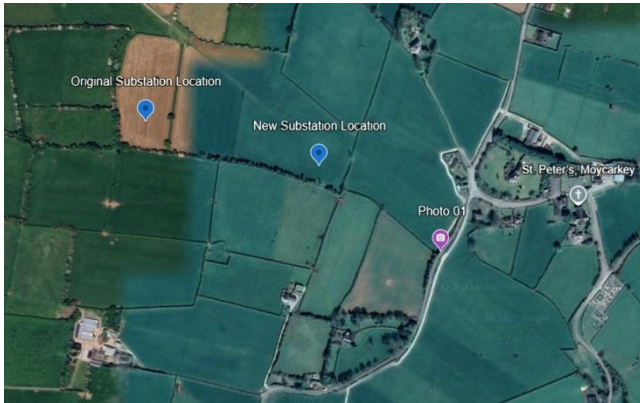


PHOTO 01

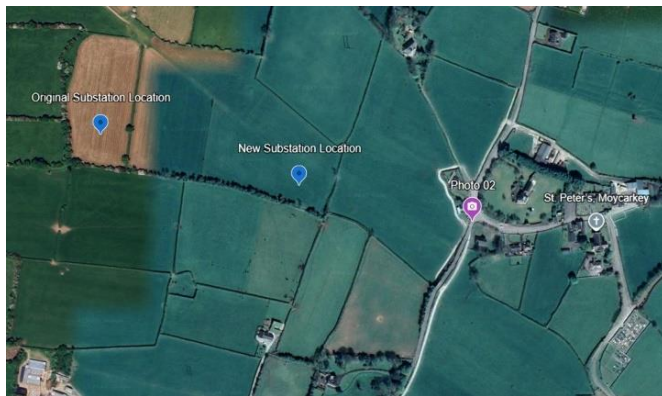
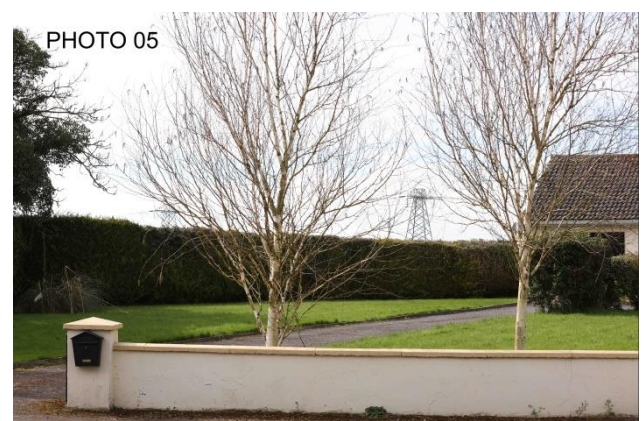
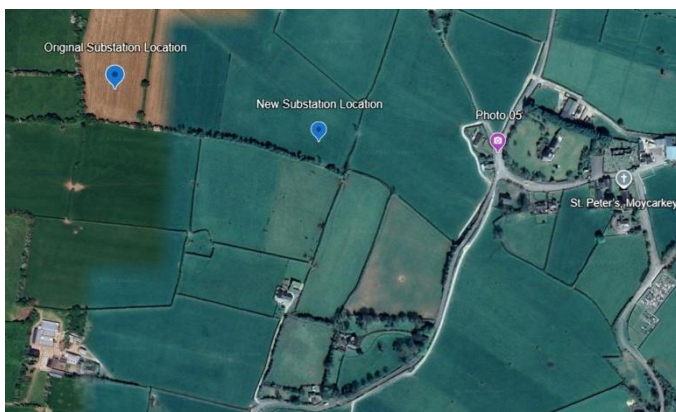
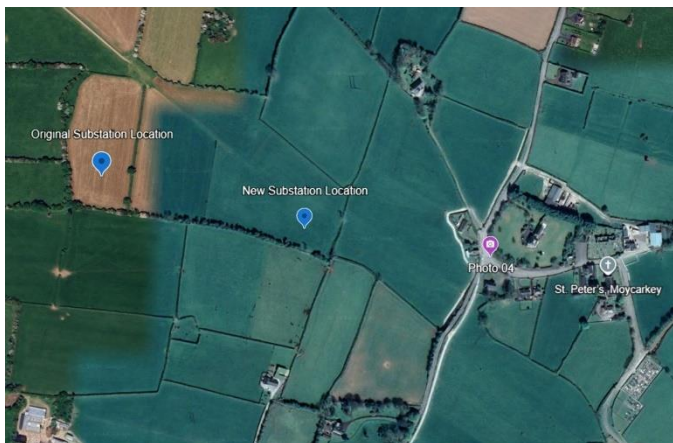
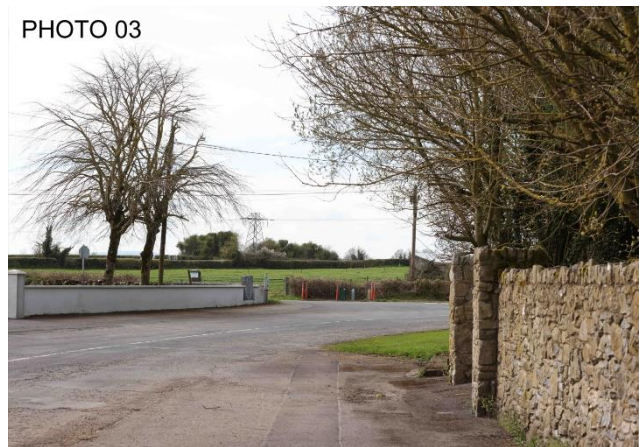
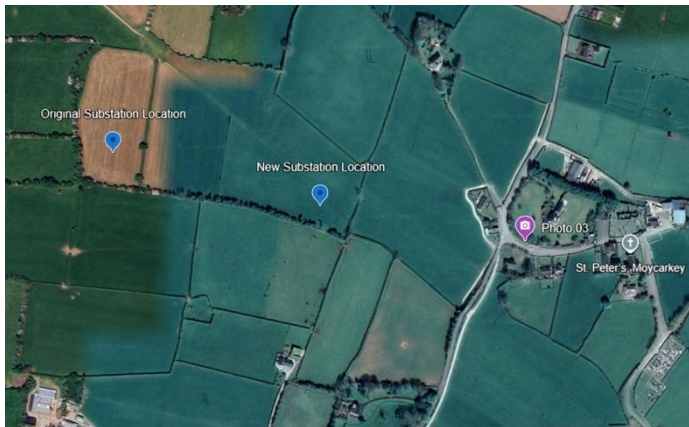
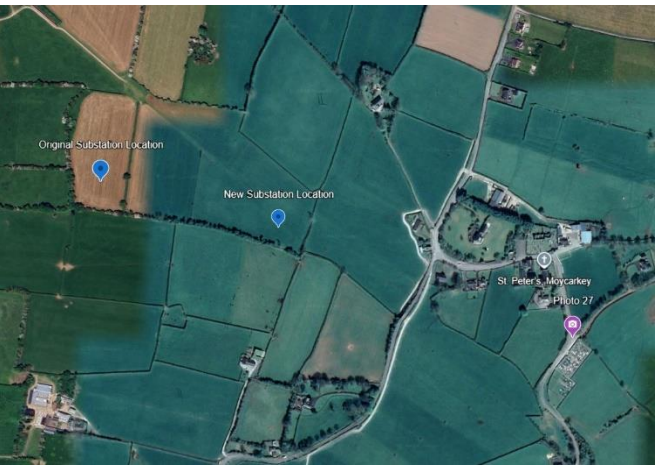
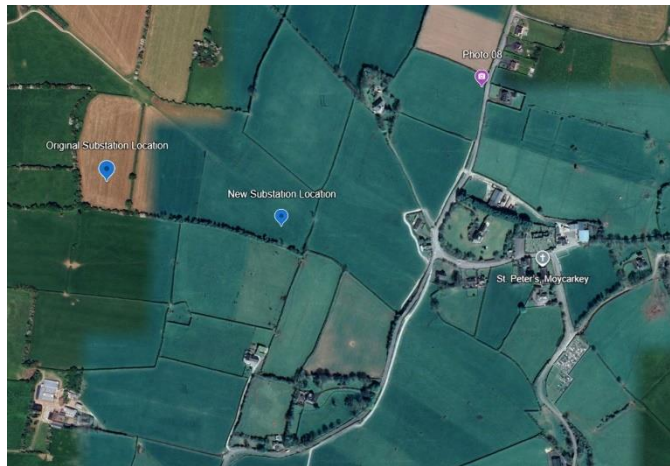
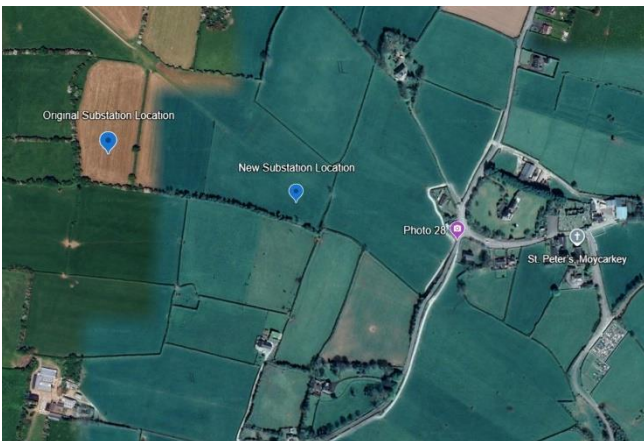
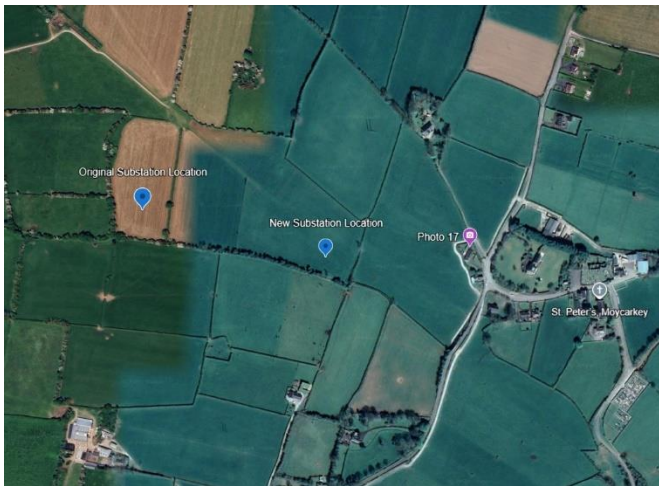


PHOTO 02









From the photos we provide above we would like to point out the following.

- Photo 04: is from the village of Moycarkey which is approximately 14.3 metres above sea level, with lower areas at around 10.1 metres. The proposed substation site, at approximately 29.9 metres above sea level, would therefore be positioned on substantially higher ground. This elevation difference would increase the visibility and visual dominance of the development when viewed from the village and surrounding approach roads
- Photo 08: highlights a key approach road into Moycarkey village, where there are uninterrupted views towards Killough Hill (pNHA, Site Code 00959). The proposed siting of a substation in this location would result in a visually intrusive development that would obscure and materially degrade these important views.

- Photo 28: highlights a valued sunset view from Moycarkey village. The introduction of a substation at the proposed location would result in an irreversible change to this landscape, significantly diminishing its visual quality and rural character.

This aerial views below clearly demonstrates the close proximity of the proposed development to nearby residential properties, raising concerns regarding its potential impact on residential amenity. Aerial footage of Moycarkey village can be viewed on the following link.

<https://www.youtube.com/watch?v=t8hfOY3qK50>

<https://www.youtube.com/watch?v=v2p1PDudXkY>

<https://www.youtube.com/watch?v=vLLHPcrEgUs>





6. Noise

The application states that no baseline noise survey was carried out.

Grounds for Observation:

- The entire noise assessment is based on assumptions rather than measured data. This undermines its reliability and fails to demonstrate that nearby residents will not be adversely affected.
- The applicant acknowledges that construction noise limits will be exceeded at multiple residential properties along the grid connection route. This demonstrates that the development will result in significant disturbance to nearby residents during construction. The reliance on mitigation measures such as temporary barriers does not negate the fact that unacceptable noise impacts are predicted to occur.
- The assessment is not based on measured conditions. Without baseline data, it's impossible to verify existing quiet levels and the true impact of added noise.
- Continuous Transformer Hum (24/7 Noise Source) introduces a continuous low-frequency noise source into a rural environment, which is likely to adversely affect residential amenity, particularly during night-time periods.
- The applicant has not demonstrated that tonal noise will not arise. Reliance on post-construction mitigation is not an acceptable substitute for proper assessment and design at application stage.
- The operational noise predictions are based on assumed equipment specifications and modelling scenarios, rather than confirmed final design data, introducing uncertainty into the assessment.
- The combined impact of several sources of electrical noise has not been adequately assessed in terms of long-term effects, including how it may affect nearby residents.
- With reference to the noise sensitive locations within 1km of the proposed site. The 1km study area contains a substantial number of residential properties, demonstrating that the development is located within an established rural community rather than an isolated setting. The scale of potential impact is therefore considerable.
- The development is spread over a large area, combining a solar farm, substation and grid connection, resulting in cumulative impacts across a wide rural area.

7. Strategic Interaction with the Proposed Clonmel–Thurles Greenway:

The proposed development must also be assessed in light of its interaction with other strategic objectives and investments, including the proposed Clonmel–Thurles Greenway, which is identified in policy as a long-term active travel, recreation, and tourism asset.

The Greenway constitutes:

- A high-value public amenity
- A linear infrastructure asset with bridges, retaining structures, embankments, and surface layers
- An environment intended for continuous public occupation, including vulnerable users.

Grounds for Observation:

The proposed Clonmel to Thurles Greenway available here <https://e0c54cdc1d.clvw-cdnwnd.com/9aff0b0e95dbfeff53733807fa95d85c/200000076-176f3176f5/TGW-RP-AL-0001-I02-2.pdf?ph=e0c54cdc1d> represents a significant opportunity to support and enhance tourism and cultural connectivity within County Tipperary. As outlined in the feasibility report, the development of a greenway aligns strongly with regional objectives to promote sustainable tourism, recreation, and access to heritage assets.

The route would also complement and strengthen access to nationally and internationally important heritage sites, including the Cashel UNESCO heritage area, by improving sustainable travel options and encouraging longer visitor stays within the region.

At a more local level, the greenway would enhance connectivity to community-based and cultural attractions such as the Littleton Labyrinth and other cultural destinations, supporting their visibility and accessibility while contributing to the local economy.

Furthermore, consideration should be given to the presence of historically significant mass paths within the study area. These routes form an important part of the cultural and social history of rural communities, and their integration into or protection alongside the greenway would add heritage value and deepen the cultural experience for users.

We are objecting to this proposed development because we are concerned about the negative impact it could have on the surrounding residential area. The size and type of the development don't feel suitable for this location, and it doesn't seem to properly take into account the area's biodiversity or the long-term sustainability of Moycarkey village.

Yours faithfully,

Michael and Liz Ryan
Moycarkey Village,
Thurles,
Co Tipperary.
E41K5C6