



Dear Sir/Madam,

On behalf of Moycarkey Community Association, I wish to submit a formal observation in respect of the Strategic Infrastructure Development application by Marmoris Limited (trading as Killough Solar) for a proposed 110kV Gas Insulated Switchgear (GIS) substation and associated works at Graigue, County Tipperary.

**An Coimisiún Pleanála – Case Reference: VA92.324132**

Please find attached a detailed submission outlining the concerns of the local community in relation to this proposed development. These concerns relate in particular to the scale, siting, visual impact, proximity to Moycarkey Village, potential implications for future residential development, flood risk, health considerations, and the cumulative impact of associated infrastructure.

The Association acknowledges the importance of national energy infrastructure; however, it is our considered view that the proposed development, as currently designed and located, raises significant issues in respect of proper planning and sustainable development.

**Request for Oral Hearing**

We respectfully request that An Coimisiún Pleanála exercise its discretion to convene an Oral Hearing in relation to this application.

Given the scale, complexity, and potential long-term implications of the proposed development, together with the level of community concern, an Oral Hearing would allow for a full and transparent examination of the issues and ensure that all perspectives are properly considered.

We would appreciate confirmation of receipt of this submission.

Yours faithfully,

THOMAS O'DWYER

For and on behalf of  
Moycarkey Community Association

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## 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:** Moycarkey Community Association

**Date:** 20/04/2026

**Case Reference:** VA92.324132

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### 1. Introduction

Moycarkey Community Association submits 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, the Association has serious concerns regarding the **location, scale, and cumulative impacts** of the proposed development, particularly given its proximity to Moycarkey Village and surrounding residential areas.

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### 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

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### 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

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#### **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.

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#### **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
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## **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.

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## **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.

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## **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.

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## **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
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## **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.

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## **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
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## **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.

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### 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
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### 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:**

Moycarkey Community Association