

TOBIN

Scart Mountain Wind Farm
Grid Connection
Planning Statement
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BUILT ON KNOWLEDGE

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1. EXECUTIVE SUMMARY

This Planning Statement has been prepared by TOBIN on behalf of FuturEnergy Scart Mountain Designated Activity Company and accompanies a planning application for the grid connection (the “proposed development”) associated with a 15-turbine wind farm and associated infrastructure, at Scart Mountain, County Waterford. The Scart Mountain wind farm SID application was submitted to An Coimisiún Pleanála (“ACP”) on 19th December 2024 (Ref. ACP 321522-24).

A pre-application consultation meeting in accordance with the provisions of s.182E of the Planning and Development Act, 2000, as amended (“PDA”) was held with ACP representatives on 12th September 2023. Subsequently ACP determined that the proposed development falls within the scope of section 182A of PDA and that a planning application for it should be made directly to ACP (ref. ACP 317824-23).

The proposed development will facilitate the generation of renewable energy through wind, thus addressing issues of security of supply and reduction of carbon emissions. As such, the proposed grid connection development assists in meeting the National Climate Objective (i.e. achieving a competitive, low-carbon, climate resilient and environmentally sustainable economy by 2050), in full accordance with Section 3 of the Climate Action and Low Carbon Development Act (2015), as amended (“CALCDA”).

With particular respect to ACP’s obligations under CALCDA, it is noted that ACP is a “relevant body” under that act and as such must: “in so far as practicable, perform its functions in a manner consistent with” inter alia “the furtherance of the national climate objective” and “the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State” (CALCDA s.15). This is a legal obligation.

The proposed development will facilitate the construction and operation of the Scart Mountain Wind Farm, which is a crucial piece of strategic infrastructure necessary to achieve Ireland’s national renewable energy targets.

2. INTRODUCTION

For ease of reference, this report is structured as follows:

- Section 1 – Project Introduction & Description
- Section 2 – Policy and Legislative Context
- Section 3 – Conclusion

This grid connection application is accompanied by a number of plans and particulars (listed in the accompanying cover letter), including an NIS and an EIAR. In the interest of efficiency and to avoid repetition, the Board is directed to the latter for detailed descriptions and assessments of the proposal.

It is also noted that a comprehensive Planning Statement has been submitted with the Scart Mountain Wind Farm application (Ref 321522-24). Whilst acknowledging that each application must be judged on its own merits, we note that the subject proposed development and the proposed wind farm development form a single project. As such, the Board is requested to have regard to the legal and policy imperatives supporting the Wind Farm development when considering the grid connection proposed development.

2.1 OVERVIEW

The proposed development provides for a 110kV grid connection which will export electricity generated on the proposed Scart Mountain Wind Farm site via an underground cable to the existing Dungarvan 110kV substation. The proposed Scart Mountain Wind Farm is the subject of a separate SID application, submitted to ACP on 19th December 2024 (Ref. 321522).

Together the proposed development and the Scart Mountain Wind Farm proposal form a single project for the purposes of EIA.

To ensure the power generated by the proposed Scart Mountain Wind Farm feeds into the national grid, a physical connection is required between the proposed wind farm substation and the existing Dungarvan 110kV/202kV GIS substation. The proposed development provides for a tail-fed connection to the existing 110kV substation via approximately 15.5km of underground cable.

The proposed wind farm has the potential to produce up to between 262,143 and 331,128 MWh (Megawatt hours) of electricity per year. The electricity produced by the proposed development will be sufficient to supply the equivalent of between 45,598 and 65,661 Irish households with electricity per year¹.

2.2 SITE LOCATION

The proposed development is located within the townlands of Scartmountain, Newtown, Coolroe, Staigbraud, Graigue Beg, Carrigaun (Hely), Graigue More, Scart (Hely), Scart (Sergeant), Vicarstown South, Glen Lower, Glen Upper, Lisroe, Carrowgarra Beg, Colligan More,

¹ This is based on the Sustainable Energy Authority of Ireland “*Energy in Ireland 2022 Report*” from December 2022, which details domestic consumption values for electricity customers in 2021. This report updates the average annual dwelling electricity consumption figure to 5,043 kWh per annum. (<https://www.seai.ie/publications/Energy-in-Ireland-2022.pdf>).

Colliganmountain, Colliganwood, Ballymacmague North, Inchindrislawood, Inchindrisla, and Killadangan Co. Waterford.

The proposed development site runs from the main wind farm site in a southeasterly direction to the existing Dungarvan substation and is illustrated in Figure 2-1 below. The cable route will be constructed primarily within public roads within the jurisdiction of Waterford City and County Council with a 2.2km section within privately owned lands (letters of consent included in the application submission).

2.3 DESCRIPTION OF PROPOSED DEVELOPMENT

The proposed development is summarised as follows (a detailed description is set out in Section 2.7.6 of the accompanying EIAR for the proposed development):

- All works associated with the connection of the proposed wind farm to the national electricity grid, which will be via a permanent tail fed 110 kV underground cable connection (approximately 15.5 km cable length of which approximately 13.3 km will be in the public road corridor) to the existing 110 kV Dungarvan Substation in the townland of Killadangan, Co. Waterford.
- 4 no. watercourse crossings on the grid connection route (of which 3 no. are classed as river crossings and 1 no. is a smaller stream crossing);
- 22 no. joint bays and communication chambers along the route;
- All associated underground electrical and communications cabling connecting the wind turbines to the proposed wind farm substation;
- All related site works and ancillary development including berms, landscaping, and soil excavation, and;
- All other associated site development plant and equipment and other works including surface water and foul wastewater drainage.

The grid connection construction methodology is set out in Section 2.8.5 of the EIAR, with a detailed report included at Appendix 2-5 of the EIAR. All cables will be laid in trenches in accordance with EirGrid Specification.

2.4 CABLE WORKS

The 110kV underground cable required to facilitate the grid connection will be laid beneath the ground surface and/or public road using the following methodology: The area where excavations are planned will be the subject of a confirmatory survey prior to the commencement of works, with a cable locating tool and all existing underground services will be identified.

A verification condition survey will be carried out for all parts of the route within the public road. Details of this survey will be agreed with the local authority in advance of the survey. A Traffic management plan will be implemented before any works take place on public roads.

A trench will be opened using an excavator to accommodate the required depth and width. The excavated material will be cast to the side to be reused as backfilling material where appropriate. This material will not be stored in the vicinity of any watercourse and will be smoothed with the back of an excavator bucket to minimise runoff. It will be cast on the upgradient side of the trench, so if any runoff did occur it will run into the down gradient trench.

Excess material will be used on the site of the proposed wind farm for borrow pit reinstatement and local landscaping. In the case of any material deemed as contaminated, a licenced waste carrier will transfer to an appropriate waste facility.

Silt fences will be installed alongside the road/works areas as required near streams. Clay dams/plugs will be installed at regular intervals (depending on the gradient) to prevent conduit flow of water within the trench. These utilise low porosity clays over the full depth of the trench at regular intervals to prevent water moving along the trench. Works will not be carried out during periods of heavy precipitation.

In the event that some surface water does accumulate in the trench, this will be allowed to percolate into the ground naturally where possible. Where dewatering is required, it will be carried out via silt bags onto vegetated areas away from watercourses. The trench will be surfaced in accordance with the road surface specifications of the local public road, or (in the case of off-road section) an EirGrid/ESB specification gravel access track to allow very occasional access for maintenance vehicles if required.

Cable joint pits are normally located at regular intervals as shown in the site layout drawings (Appendix 1-1 of the EIAR). They will be constructed off narrow sections of the public road where this is possible (i.e. before/after entry to the road corridor, in lay-bys, etc.). A temporary surface is provided over these for safety and to allow easy access until the cables are pulled, after which time the area will be permanently reinstated/surfaced as appropriate.

It is anticipated that construction will be carried out by a single team (with plant items likely to include excavators and dumpers) along the route, but there is a possibility to use two separate teams to speed up the construction. It is expected that each team will lay approximately 50 m of the route per day. Further details with respect to the construction methodologies are provided in Appendix 2-5 of the EIAR.

2.5 TRAFFIC

A Traffic Management Plan has been prepared for the proposed development and is included as Appendix 2-4 of the accompanying EIAR. This is a live document and will be updated ahead of construction to address the requirements of any relevant planning conditions, including any additional mitigation measures which are conditioned by An Coimisiún Pleanála, in the event approval is granted. Also, a confirmatory survey of road condition, including the condition of all road water crossings on the route, will be carried out along the proposed grid connection route in advance of any works.

2.6 ENVIRONMENTAL ASSESSMENT

The proposed development (wind farm and grid connection) “screened in” for Stage 2 Appropriate Assessment by virtue of likely significant effects on three European sites, namely the Blackwater River [Cork/Waterford] SAC, Dungarvan Harbour SPA and Blackwater Estuary SPA. With respect to the proposed development (i.e. grid connection), horizontal directional drilling will be necessary when installing the cable across watercourses. No instream works are proposed for any natural watercourse. All watercourses flow into the Blackwater River (Cork / Waterford) SAC. The grid connection works are also hydrologically linked to the Dungarvan Harbour SPA.

The Commission is referred to the NIS accompanying this submission, which finds that following the application of detailed mitigation measures, likely significant effects will be avoided, and that the project will not adversely affect the integrity of a European site(s) either individually or in combination with other plans and projects in view of the sites' conservation objectives.

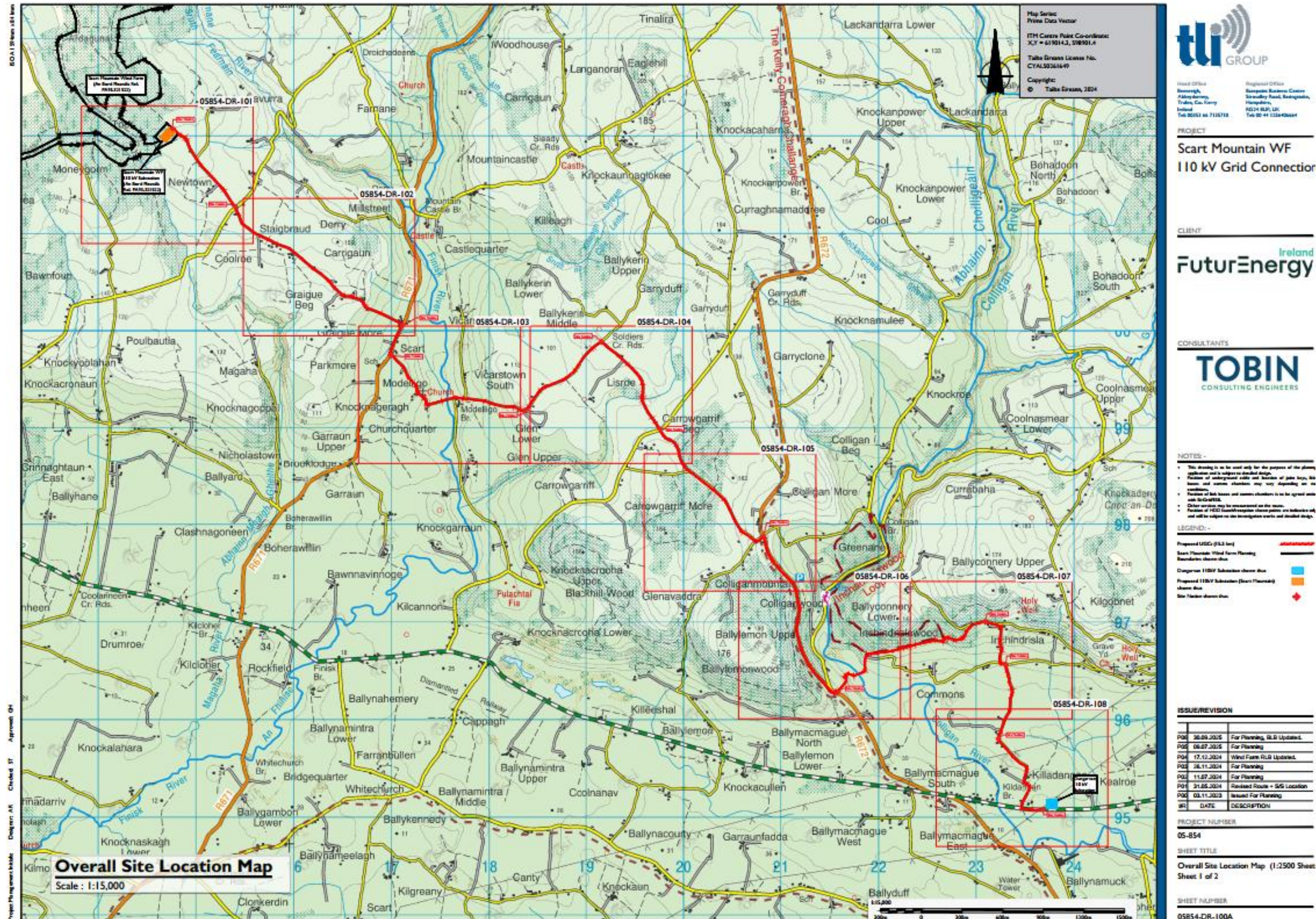


Figure 2.1: Site Location Map

3. POLICY AND LEGISLATIVE CONTEXT

This section of the report summarises the most relevant legislation and planning policy matters to be considered by the Commission when assessing the proposed grid connection development. A comprehensive overview of the international legislative and policy context supporting the Scart Mountain Project as a whole is set out in Chapter 4 of the accompanying EIAR. The summary below will confine itself to a summary of the national context in the interest of brevity and to avoid repetition.

3.1 CLIMATE ACTION AND LOW CARBON DEVELOPMENT ACT (CALCDA)

In addition to its duties under the Planning Act and other EU and national law, as a “relevant body”, ACP has particular duties under the CALCDA. Section 15 of that Act provides:

15. (1) A relevant body shall, in so far as practicable, perform its functions in a manner consistent with–

- (a) the most recent approved climate action plan,*
- (b) the most recent approved national long term climate strategy,*
- (c) the most recent approved national adaptation framework and approved sectoral adaptation plans*
- (d) the furtherance of the national climate objective, and*
- (e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State*

Having regard to the far-reaching obligations of Section 15, ACP has a duty to prioritise renewable energy projects (including necessary grid connection proposals). This is particularly the case given that the Climate Action Plan’s binding target of 9 GW of onshore wind by 2030 is widely acknowledged to be in jeopardy, and that the latest EPA Greenhouse Gas Emissions Projections Report finds that Ireland is further from its 2030 national climate target compared to previous assessments².

3.2 CLIMATE ACTION PLAN 2025

The statutory Climate Action Plan 2025 (CAP25) is the third update of Ireland’s implementing tool by which Ireland will achieve its legally binding national climate objective via carbon budgets and sectoral emissions ceilings. Notably, this plan says that we must now focus on “turbocharging delivery”. The Plan includes the following key provisions in relation to renewable electricity; and to onshore wind development.

- Renewable electricity targets
 - Renewable electricity targets of 50% by 2025 and 80% by 2030
 - Onshore wind installed capacity of 6GW by 2025 and 9GW by 2030.

Similar to EU policy, national policy is clearly calling for the rapid acceleration in deployment of renewable electricity projects.

It has taken Ireland over 20 years to deliver 4.3GW of onshore wind. The government is now asking the sector, supported by all relevant national stakeholders (relevant bodies), to more

² This is based on the EPA “*Ireland’s Greenhouse Gas Emissions Projections 2024-2055*” which provides an assessment of Ireland’s total projected greenhouse gas emissions out to 2055 ([Ireland’s Greenhouse Gas Emissions Projections 2024-2055 | Environmental Protection Agency](#)).



than double that in the next 7 years. This is a proportionate response to the twin climate and energy security / energy cost crises. The emphasis on urgency and the necessity to scale up ambition for renewable energy development in the Climate Action Plan is completely consistent with International and European policy contained in Regulation 2022/2577 and Directive RED III. These ambitions have all been effectively restated in CAP25.

3.3 NATIONAL PLANNING FRAMEWORK (REVISED 2025) & RSES FOR THE SOUTHERN REGION

Ireland 2040 - National Planning Framework, hereafter referred to as the NPF, was first published by the Government in February 2018, and the Revised NPF was published in June 2025. The NPF is a 20-year planning framework designed to guide public and private investment, to create and promote opportunities for Irish citizens, and to protect and enhance Ireland's built and natural environment. The new framework sets out five strategic actions required to achieve this vision:

- Developing a new region-focused strategy for managing growth;
- Linking this to a new 10-year investment plan, the Project Ireland 2040 National Development Plan 2018-2027;
- Using state lands for certain strategic purposes;
- Supporting this with strengthened, more environmentally focused planning at local level; and
- Backing the framework up in law with an Independent Office of the Planning Regulator.

The NPF notes that the population of Ireland is projected to increase by approximately 1 million people by 2040 which will result in a population of roughly 5.7 million. This growth will place further demand on both the built and natural environment as well as the social and economic fabric of the country. In order to strengthen and facilitate more environmentally focused planning at the local level, the NPF states that future planning and development will need to:

“tackle Ireland's higher than average carbon-intensity per capita and enable a national transition to a competitive low carbon, climate resilient and environmentally sustainable economy by 2050, through harnessing our country's prodigious renewable energy potential.”

The NPF covers a wide range of national policy objectives and National Strategic Outcomes (NSO) such as NSO 8. The key outcome provided for under NSO 8 is to transition our society to 'competitive, low-carbon, climate-resilient, biodiversity rich, and environmentally sustainable and carbon neutral economy by 2050' a low carbon and more climate resilient society' and states that 'new energy systems and transmission grids will be necessary for a more distributed, more renewables focused energy generation system, harnessing both considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy'.

The NSO further states that 'diversification of our energy production systems away from fossil fuels and towards green energy such as wind, wave, solar and biomass, together with smart energy systems and the conversion of the built environment into both generator/consumer of energy and the electrification of transport fleets will require the progressive and strategic development of a different form of energy grid'.

In summary the key steps indicated for delivering a low carbon society according to NSO 8 are as follows:

- Delivery of 80% of our electricity needs from renewable sources by 2030 with a strategic aim to increase renewable deployment in line with EU targets and national policy objectives out to 2030 and beyond;
- Reinforce the distribution network and transmission network to facilitate planned growth;
- Strengthen energy security and resilience to support an island population of 8 million people;
- Consideration of carbon neutral electricity generation that would be facilitated through harnessing carbon capture and storage;
- Interconnectors offer the opportunity to connect to the EU Grid system; and
- Roll out National Smart Grid Plan;
- District heating networks developed where feasible.

Planning legislation provides for the Government to revise or replace the NPF every six years. Following a decision of Government in June 2023, the NPF was updated and published as draft for public consultation in July 2024. The finalised document was approved on the 8th of April 2025.

The revised framework retains the original NPF's focus on a more balanced distribution of growth across all of Ireland's regions and emphasises the potential for regional growth to harness the attractiveness and assets of all regions and places to a greater extent than ever before.

The revised NPF amends the previous National Strategic Outcome 8 to reflect updated legally binding renewable energy and greenhouse gas emissions targets set out under CAP 24.

The revised National Planning Framework 2025, states it is an objective to:

"Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050." (Objective 70)

Additionally, Chapter 9.2 of the revised NPF sets out Regional Renewable Electricity Capacity Allocations as set out in Figure 3-1 below. The proposed development is located in the Southern region for which 978MW has been identified as an additional renewable power capacity allocation, which in the year 2030, would amount to ca. 23% of the total national share.

Region	Energised capacity 2023 (MW)	Additional Renewable Power Capacity Allocations (MW)	Total % of National Share in 2030	Energised Capacity 2023 (MW)	Additional Renewable Power Capacity Allocations (MW)	Total % of National Share in 2030
	Onshore Wind			Solar PV		
Eastern and Midlands	284	1,966	25%	306	3,294	45%
Northern and Western	1,761	1,389	35%	0.3	959	12%
Southern	2,622	978	40%	138	3,302	43%
Total	4,667	4,333		445	7,555	

Figure 3.1: Regional Renewable Energy Capacity Allocations

Notably these national objectives are legal obligations under CALCDA.

The Regional Spatial & Economic Strategy (RSES) published by the Southern Regional Assembly states:

“It is an objective to support the sustainable development of renewable wind energy (on shore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.” (RPO 99)

The proposed grid connection development will facilitate the Scart Mountain wind farm project, the location for which has been evaluated as having a suitable wind resource. It has also been assessed against each of the topics contained in the EIAR and adverse residual environmental impacts are avoided demonstrating the appropriateness of the site in line with National and Regional planning objectives.

The proposed grid connection development is therefore aligned with the NPF and RSES.

3.4 WATERFORD CITY & COUNTY DEVELOPMENT PLAN

The statutory Development Plan pertaining to the subject site is the Waterford City and County Development Plan 2022 – 2028. It came into effect on July 19th 2022 and replaced the 2013-2019 extended County Development Plan (CDP). The CDP sets out the Council’s strategic land use objectives and policies up to 2028.

The vision for County Waterford in the lifetime of the CDP is:

‘By 2028, Waterford City and County will have continued to grow and will be evolving to become an even more attractive, prosperous, resilient, and sustainable place, anchored by Waterford City and Metropolitan area as the Regional Capital, a University and Learning City, and an economic driver for the region. It will be the best City and County in which to live, learn, visit and do business.’

The CDP also sets out key strategic aims over the lifetime of the plan of which the below are of relevance to the proposed development:

- Take on the urgent challenges of climate change.

Section 11.0 Zoning and Land Use of the CDP sets forward the landscape designations of the county, and suitable land uses. Provision of utilities (which includes grid connections) is necessary across all land uses and zonings. This is recognised in the Development Plan whereby “utility” is open for consideration for all use types.

Policy UTL13 has a stated objective of supporting renewable energy projects in order to, inter alia, reduce dependence on fossil fuels (with corresponding environmental, social, and economic benefits for the City and County). This policy explicitly recognises the need for supporting “onshore cable routing to substations” and confirms support for onshore grid connections.

Policy UTL 19 - Underground Cables, requires that proposals demonstrate that environmental impacts are minimised. In this regard ACP are referred to the accompanying EIAR and NIS which demonstrate that no unacceptable adverse environmental impacts will arise from the proposed development.

4. CONCLUSION

The proposed Scart Mountain wind farm which the proposed grid connection development will facilitate has the potential to produce up to between 262,143 and 331,128 MWh (Megawatt hours) of electricity per year. The electricity produced by the proposed development will be sufficient to supply the equivalent of between 45,598 and 65,661 Irish households with electricity per year.

Ireland has a target of 9GW of installed onshore wind capacity by 2030. As noted in Section 2 above, the latest EPA Greenhouse Gas Emissions Projections Report finds that Ireland is further from its 2030 national climate target compared to previous assessments. The Scart Mountain Wind Farm project (of which the subject proposal is a fundamental component) has the potential to contribute approximately 2% of the total additional onshore wind capacity required nationally by 2030, which we believe to be a strong consideration for the Board when determining the proposed development. Furthermore, the addition of between 85.5–108 MW of installed wind energy capacity from the proposed development will improve our security of supply and reduce our reliance on energy imports.

The proposed development will bring the south eastern region of Ireland closer to achieving carbon neutrality by providing a significant source of renewable electricity that will reduce the need for using fossil fuel-based energy. The proposed development will facilitate Waterford City and County Council in fulfilling many of their obligations and targets with respect to renewable energy delivery.

