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18/11/25

The Secretary

An Coimisiun Pleanala

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**An Coimisiun Pleanala Case Reference: VA93.323791**

Strategic Infrastructure Development Application (SID Determination ref-317824-23) By Tobin Consulting Engineers on behalf of Future Energy Scart Mountain Designated Activity Company.

Description : Proposed Development of a 110v Electrical substation and Grid Connection from the proposed Scart Mountain Wind Farm development (case ref:PA93.321522, (currently awaiting decision) to Dungarvan substation in County Waterford.

The proposed 110kv grid connection, substation and related works are located within the townlands of Ballykerin Middle, Ballymacmague, Carrigaun (Hely), Carrowgariff Beg, Carrowgariffmore, Churchquarter, Colliganmountain, Colliganwood, Coolroe, Glen Lower, Glen Upper, Graigue Beg, Graigue More, Inchindrisla, Inchindrislawood, Killadangan, Lisroe, Newtown, Parkmore, Scart (Hely), Scart (Sergeant), Scartmountain, Staigbraud and Vicarstown South, Co Waterford.

Dear Committee,

I wish to submit the following observation regarding the above planning application for the proposed Grid Connection and 110V Electrical substation associated with the proposed Scartmountain windfarm.

Whilst supporting the transition to renewable energy in principle, I have serious concerns regarding the route selection and environmental impact of the grid connection and substation. My concerns are as follows:

### **1. Modeligo County Council public water supply**

My main concern is the proximity of the Modeligo Public Council well to the proposed grid connection route and 110v electrical substation. The well is situated on the roadside of the L5056 where the proposed underground grid route is to be excavated. (Newtown entrance of the proposed Windfarm site)



Photo of Modeligo public well to the left of the L5056, which will be excavated for the grid connection.

The well supplies water to our own house as well as over 188 other houses, farms and businesses in the locality according to the EPA website (scheme code for the well is 3100PUB1116). This data dates back to 2019 so the number of homes using the well water will have since increased.

Excavation of the grid route next to the group well will require significant trenching, excavation and heavy vehicle movement as will the substation site which is just 300metres away. Dimensions of the substation are 140m x 85m and estimated excavation volumes are 7,400m<sup>3</sup>.

As we are considering the grid and substation planning application as one part of the complete proposed Scartmountain windfarm project – it should be noted the nearest borrow pit is just 1km from the council water supply, dimensions 323m x 205m and will be dug to a depth of up to 6 metres using rock breaking and blasting (as cited in the non-technical summary, point 9.1 Hydrology and Hydrogeology). The second borrow pit dimensions are 178m x 205m. Whilst the 15-wind turbine and hardstand foundations will be

dug to a depth of 5 metres, with dimensions of 22 x 28m. Plus there will be numerous large, wide roadways put in place throughout the forestry to accommodate the installation of the 15x 185m tall wind turbines, and associated ground work.

All of these activities have the potential for groundwater and surface water contamination of the water supply to the Modeligo well, plus damage to associated aquifers. Mitigation factors mentioned in the planning application attempt to persuade An Coimisiun Pleanala that the project will not give rise to adverse effects on surface and ground water, but logically and realistically how can deforestation of 31 ha, estimated excavations of up to 112,300m<sup>3</sup> and deposits of 2,130 delivery loads of concrete (as quoted by Future energy ) not detrimentally impact the surface and groundwater flow and quality in the area.

The Modeligo Public Council well is not highlighted on the grid connection route map by Future Energy. There is no mention of a Source Protection Zone or Zone of Contribution for the well in the planning application. The only acknowledgment Future Energy have towards the Modeligo Public Water Supply is as follows. 'The Modeligo borehole and WSZ is located 0.36km to the southeast of the proposed substation'. It does not specify what the WSZ is or that excavation will be outside its boundaries. Neither Uisce Eireann or Waterford County Council have been able to supply a SPZ or ZOC for the well when asked to do so. Nor is it mentioned on the Geological survey Ireland list of SPZ for County Waterford. It is important that an independent survey of a ZOC and SPZ are determined by the Geological Survey of Ireland and the Environmental Protection Agency before any further consideration is given to the Scartmountain grid connection and Substation at Newtown in order to protect the water supply to Modeligo residents.

The proximity of the electrical grid connection excavation to the Modeligo Public well also gives rise to concern that the water supply pipe work may be damaged during the process of excavation for the grid connection, leaving houses and businesses in Modeligo without water. Depths of excavation for trenching are 1315mm. As far as I am aware minimal depth requirement for Council water pipes is 600mm, with 750mm being the recommended depth.

## **2.County Council Development plan -protecting the local environment.**

The fact that Tobin Engineers have submitted most/ all of the material for the windfarm planning permission within the application for the Grid and Substation planning application re-iterates that their relevance is interdependent. With that in mind it is important to point out that the proposed windfarm site at Scartmountain is located in an area deemed a 'Wind Energy Exclusion zone' and 'Highly Sensitive' in the Landscape and Seascape Character Assessment by Waterford City and County Council under the Waterford City and County Development plan 2022-2028. There are other alternative sites in Waterford where land is zoned as 'preferred' or 'open to consideration' that would be more suitable. Rationale for its unsuitability includes:-.

The 981.4-hectare area proposed for the Scart mountain windfarm is 400m above sea level and is hydrologically linked to the Farnane River (EPA states as high quality), River Finnisk, Glenshelane River (SAC and Blue Dot River)- the whole area is a sub basin for the Blackwater River -the quality all of which Waterford County Council are trying to protect and improve in compliance with EU legislation.

The forestry at Scartmountain is the habitat and breeding ground to species such as Hen Harriers, Golden Plover, Kestrel, Red Grouse and Snipe, by citing the Scart Mountain area as a 'no wind zone' area, Waterford County Council are trying to protect these rare species under the EU birds Directive 92009/147/EEC) and EU Habitats Directive (92/43/EEC).

It is also the habitat for many other types of wildlife including deer and badgers -both protected under the Wildlife Act 1976 and the Wildlife Amendment act 2000. ( I have images of Badger tracks in Scartmountain forestry taken 1/7/25-see below )



Ireland uses individual County Councils Development plans to meet the EU Directive for National Renewable Energy Mapping (Renewable Energy Directive 2023/2413) and coordinates them to give a national map that has been environmentally assessed and has had the necessary statutory public consultation. Therefore, as Waterford County Councils Development Plan contributes to/ is the same as the only national, environmentally assessed mapping plan for renewable energy in compliance with EU Directives surely it should be adhered too? The EU aim and therefore Ireland's aim is to increase renewable Energy whilst limiting as much as possible any adverse environmental effects whilst doing so.

Waterford County Council have highlighted areas in their development plan that are less of an environmental risk and preferred, for the development of Wind Energy in Waterford, it is contrary to the whole principle of protecting the environment that necessitates the purpose of wind energy in the first place that Future Energy should contravene this.

### **3. Lack of community engagement**

There has been no community engagement regarding the grid connection and substation construction planning application. Public consultation has focused primarily on the wind farm itself, not the transmission infrastructure. When we initially visited the Park Hotel to view plans of the proposed wind farm in November 2024, the substation was to be situated to the south west of the windfarm site nearest to the Lackenrea / Moneygorm L5055 entrance . There was no information available regarding the grid connection. We learnt of the substations relocation on viewing the completed planning application that was lodged with An Bord Pleanala. We are subsequently now one of the nearest dwellings to it and find the scale and implications of this unacceptable.

This undermines meaningful participation and fails to meet the standards of transparency expected for projects of such significance.

The same can be said for the grid connection and substation planning application in totality. Routes, maps and relevant material are lost in masses of information pertaining to the previously submitted Windfarm Planning Application - this again runs contrary to the principles of transparency.

Finally, the depth of the borrow pits. In the Windfarm planning application (Case Ref PA93.321522) drawing no 1103-2023- Borrow Pit Details pdf, illustrates the depth of the borrow pits as being a max of 10 metres. However in the Grid Connection and Substation planning application, in the non technical summary, point 9.1 Hydrology and hydrogeology, it states the depth of the 2 borrow pits to be 6 metres. This is a huge discrepancy and could be of significance to ground water in the area. Clarification is required.

### **4. Effect on local residents**

The grid connection excavation will pass through the heart of Modeligo, in front of the Church, local Pub, Community centre and GAA pitch. It will also impede the flow of traffic to and from the local National School on the L- 5056, R-671 and the L-1032. This is a very rural community - it will also slow and impede the work of agricultural contractors and farmers. The access road (C5056) leading to the proposed substation that will be excavated for the grid connection is narrow, has a very steep gradient and a concealed bend, only catering for a single lane traffic in places and is not suitable for heavy vehicles. Its excavation will cause considerable inconvenience and difficulty for local residents. The nearest alternative route (Derra Boreen) that will inevitably be used by locals living in the vicinity during excavation for the grid connection is even worse -having an extremely steep gradient with 3 blind bends in

quick succession, accommodating single lane traffic only in almost all parts- it is not safe for it to facilitate further volumes of traffic

Basically, to summarise ,Future Energy is a company comprising two large government entities, ESB and Coillte, who have approx. 20 Windfarm projects on going throughout the country. They undoubtedly have a standard format for planning applications-adjusting information as needs be for the various windfarm locations. Theirs' is a monetary and not an environmental investment- if it was anyway environmentally concerned it would comply with the County Councils Development plan for 2022-2028, which forms part of the National wind Energy Mapping Plan.As stated this deems Scart Mountain as 'most sensitive ' in its landscape and seascape character assessment. It is doing its utmost through careful consideration when formulating its Development Plan to comply with EU Directives to protect landscape, habitats, species and Rivers. Renewable Energy must be achieved through a responsible assessment of areas put forward for planning.

Yours sincerely,

Helen Hickey.