

The Dale
Ballinamult
Via Clonmel
Waterford
E91 Y970

21st November 2025

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

To whom it may concern

Dear Sir/Madam

An Coimisiún Pleanála Case Reference: VA93.323791

Strategic Infrastructure Development Application (SID Determination ref: ABP-317824-23)
By TOBIN Consulting Engineers on behalf of **FuturEnergy Scart Mountain Designated
Activity Company**

**Description: Proposed Development of a 110kV underground 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 and related works are located within the townlands of of Ballykerin Middle, Ballymacmague North, Carrigaun (Hely), Carrowgarriff Beg, Carrowgarriff More, Churchquarter, Colligan More, 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.

www.scartmountaingridplanning.ie

I wish to make the following Observation against the above planning application for the construction of Scart Mountain Grid Connection:

This planning application is for construction of an underground 110kV Grid Connection (and all associated infrastructure) that will connect the proposed Scart Mountain Wind Farm (ACP Ref. 321522) development (approximately 4 km northeast of Cappoquin and approximately 13 km northwest of Dungarvan) to the existing 110kv Dungarvan substation in County Waterford. The cable route will be constructed primarily within public roads within the jurisdiction of Waterford City and County Council.

The site of the no. 15-turbine proposed Scart Mountain Wind Farm itself is located in an area deemed a 'Wind Energy Exclusion' area and 'Highly Sensitive' in the Landscape and Seascape Character Assessment by Waterford City and County Council (WCCC) under the Waterford City and County Council Development Plan 2022-2028. While I understand I can no longer make an Observation against the wind farm development, I wish the Commission to bear in mind that its unsuitability needs to be taken into consideration when making a decision on the Grid Connection Application as both developments are interdependent on each other and one cannot function without the other – as the Applicant themselves states.

There are many alternative location options within Waterford, where land is zoned as 'Preferred' and 'Open to Consideration' under the Wind Energy Strategy of the Development Plan. One of the aims of the Renewable Energy Strategy is to maximise the opportunities for renewable energy development, whilst safeguarding the environment and other amenities, subject to Strategic Environmental Assessment and Habitats Directive Assessment requirements. Much research and careful consideration was undertaken by WCCC when deciding the areas of suitability for wind farm development. And as the Commission will be aware, the Planning Authority of Waterford County Council does not recommend that planning permission be granted for the proposed wind farm development – this was unanimously agreed by all councillors present at the Dungarvan and Lismore District Meeting on 26 February 2025 (please refer to correspondence from WCC dated 10 March 2025).

My main concerns for this Grid Connection planning application are:

The local roads are not suitable for this work.

No testing of the road construction has been carried out. These are older roads, from evidence on OSi mapping, meaning it's highly likely that they are coal tar macadam (CTM). CTM was commonly used in Ireland's road construction, until around the 1980s. It contains polycyclic aromatic hydrocarbons (PAHs), now classified as carcinogenic.

Because of this, its manufacture and use are prohibited under EU chemical legislation. If coal-tar-bound material is uncovered:

It must be tested for PAHs.

It must be handled as hazardous waste if concentrations exceed thresholds.

It cannot be reused in road construction unless proven safe (which is rare), it must be taken to an authorised hazardous waste facility and disposed of correctly.

The consequences of dealing with probable hazardous waste material, have not been assessed. This would result in the works taking longer than anticipated, holes would be open for longer, the waste material can't be piled up on a permeable surface at the side of the road and more vehicles would be required to remove the waste and bring in new filling materials.

No traffic surveys have been carried out on the gcr. The local roads are busy, especially during the silage season. The R671 is a much used link from Lismore/Cappoquin and also from the Youghal, Cork direction, from the N72 to the local area and onwards to Ballinamult, and Clonmel. There are haulage businesses, quarries, and bus companies based in this area, who use these roads daily, along with feed companies, Tirlán tankers and all the usual farm traffic,

as well as the school/work commuters and regular everyday traffic. The R672 is the main route between Dungarvan and Clonmel, which is heavily used by large haulage vehicles, buses, commuters etc.

Many of the roads within the grid connection route (gcr) carry a lot of surface water / run off, due to the gradient, bearing in mind the height above sea level (300m - 486m) of the proposed wind farm, travelling down to Dungarvan on the coast. There are streams, gutters and gullies running along many of these roads, taking the water to the Finisk and Colligan rivers respectively. The silt from road works would be damaging enough to the water quality, but if the road material contains polycyclic aromatic hydrocarbons, it would have a devastating impact on these protected waterways and to the local water supplies.

Most of the gcr runs along local roads, narrow, twisting, often steep roads. Much of the route is only the width of one vehicle. This would necessitate road closures, as there wouldn't be room to pass the works. In such rural areas, the road network is sparse, meaning diversions would be difficult and long, but in some places impossible. For example, the first section of the gcr along the road from the forestry track, this road is a cul de sac, there is no other road to access the properties or farm land here. The Modeligo Water Pump Station (WPS) is also in this section (though this appears to have been completely ignored by the developers). This road closure would result in no access to properties, farmers unable to get to their livestock/land, no access to the WPS, and emergency services wouldn't be able to get through.

The WPS supplies over 200 local customers, including businesses and the local school, which can't operate without water. No water, means no toilets, and without toilet facilities, the school wouldn't be allowed to open.

The 'in combination effect' on the roads has been incorrectly dismissed by the Applicant. There are many other, proposed and granted, planning developments in the local area, which are likely to proceed within the same time frame, trying to meet the 2030 Climate Action targets, and alleviate the housing crisis. These will all have a negative impact on the N72, R672, R671 and on the overlapping local road network.

Road safety, particularly in Modeligo on the R671, is of great concern. The gcr is very close to the primary school and also on the bus route, where people wait on the road for the local buses and secondary school buses. The mitigation measure of avoiding the school area at certain times is inadequate, as the times suggested don't correspond with the school times, and as the school start/finish times are staggered throughout the day for the infant, primary and secondary school children, it wouldn't be possible to avoid all busy times.

There is a risk of damage to the church (AH2) and graveyard in Modeligo, which is very close to the road, graves are only separated from the road by a low wall.

Where the gcr enters private land, it is difficult to follow where the route is supposed to be going. The land folio number stated doesn't apply to land in this area, and the intended crossing point of the Colligan river isn't consistent, there appear to be different options mentioned by the Applicant, none of which have been sufficiently assessed, as the only borehole testing was carried out at a different location to any of the proposed drilling/crossing points.

The mitigation measures in respect of birds at Colligan Wood and Inchindrisla Wood are totally inadequate. Just to 'avoid' working during the bird nesting season is unacceptable. The nesting season is much longer than was stated, with nesting now taking place much earlier in Spring

and continuing much later into the Autumn/Winter months. No proper assessment of birds, bats, or in fact any wildlife, has been carried out in the Colligan Wood and Inchindrisla Wood area.

The flood risks are high on the gcr. As already mentioned, the route travels from the proposed wind farm site, where the elevation ranges from 300m to 486m above sea level, to the coast in Dungarvan. Most of the roads carry surface water and have gutters, gullies, streams or pipes to carry water from the roads into the rivers. The areas at Modeligo bridge, Inchindrisla and Killadangan are particularly at risk and have a history of flooding.

I trust that An Coimisiún Pleanála will refuse to grant planning permission for the proposed Grid Connection, based on the grounds of this Observation and any other reasons which the Commission consider appropriate for refusing permission.

Yours faithfully

Nicola Windsor Smith

50 euro fee has been paid online.