

Sinead White

From: Landuse Planning <LandUsePlanning@tii.ie>
Sent: Thursday 13 November 2025 11:47
To: SIDS
Subject: ACP case ref. VA93.323791 (Futureenergy Scart Mountain Designated Activity Company)
Attachments: ACP case ref. VA93.323791.pdf
Categories: Sinead White

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TII ref. TII24-129857

Dear Sir / Madam,

Please find attached a copy of TII observations on the above Strategic Infrastructure Development application.

Yours sincerely,
Michael McCormack
Senior Land Use Planner

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The Secretary
An Coimisiún Pleanála
64 Marlborough St.
Dublin 1
D01 V902

by e.mail; sids@pleanala.ie

Dáta | Date

13 November 2025

Ár dTag | Our Ref.

TII24-129857

Bhur dTag | Your Ref.

Re: Application for development of a 110kV Electrical Substation and Grid Connection at Scart Mountain, Co. Waterford

ACP case ref. VA93.323791

Dear Secretary,

The Authority acknowledges receipt of referral of the above proposed Electricity Development Application on behalf of Futureenergy Scart Mountain Designated Activity Company. The subject development proposal 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.

Transport Infrastructure Ireland (TII) acknowledges that the subject development proposal can contribute to achieving the national target of renewable energy generation and reduction in greenhouse gas emissions.

In that regard, TII welcomes and is supportive of proposals aimed at achieving the transition to a low carbon and climate resilient economy, increasing renewable energy generation and enhancing energy security giving effect to National Strategic Outcome no. 8 of the National Planning Framework 'Transition to a Low Carbon and Climate Resilient Society'.

Within the foregoing context, it is proposed to address the proposed development in relation to the provisions of official policy and in relation to national road network maintenance and safety to ensure the proposed development can proceed complementary to the requirements of official policy concerning maintaining the strategic capacity and safety of the national road network in accordance with National Strategic Outcome no. 2 of the National Planning Framework 'Enhanced Regional Accessibility'.

1. Official Policy

The Commission will be aware that official policy concerning development management and access to national roads is outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).



Section 2.5 of the DoECLG Guidelines sets out policy that seeks to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses (i.e. non-public road access) to national roads, to which speed limits greater than 50 kph apply.

In that regard, the Authority acknowledges that the application documentation submitted in relation to the subject application for a proposed 110kV grid connection and related works indicates no direct access requirements to the national road network in the first instance. TII's observations in relation to the associated windfarm application (ACP Case ref. PA93.321522) remain as set out in TII's previous submissions related to that application.

2. National Road Network Maintenance and Safety

In addition to the above, there are a number of operational issues related to the subject development proposal, in the Authority's opinion, that are required to be considered to address network maintenance and road safety prior to any decision on this planning application.

2.1 Proposed Turbine Component Delivery Route

In relation to proposed Turbine Component delivery to site, Section 2.7.2.1 of the EIAR details a turbine delivery route to site from Belview Port, indicating the N29, N25 and N72 national roads form part of the turbine delivery route.

Section 2.7.2.1 and Section 16.2.4.2.2 of the EIAR and Table 16-8 indicate the details of the accommodation works required to facilitate turbine component delivery to site. In relation to the national road network, works include;

- Hard surfacing and temporary signage demounting at the Carrick Road Roundabout on the N25,
- Hard surfacing and temporary signage demounting at the Slieverue Roundabout on the N29,
- Hard surfacing and temporary signage demounting at the Luffany Roundabout on the N25,
- Temporary signage demounting at the intersection of the N25 and N72,
- Temporary signage and bollard demounting on the N72 (where it intersects the R672).

The development description outlined in Section 2.1 of the EIAR also outlines works to include temporary improvements and modifications at the junction of the N72 and the L1027 (known as Boheravaghera Cross or Affane Cross) to facilitate delivery of oversized loads and turbine delivery. These works indicate a proposed temporary bypass of the N72/L1027 junction for turbine component delivery to site.

In relation to proposals, the Authority's position remains as set out in TII's submission on the initial windfarm application (ACP Case ref. PA93.321522) and as follows;

In the first instance, it should be noted that the national road network is managed by a combination of PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities. The applicant/developer should consult with all PPP Companies, MMaRC Contractors and road authorities over which the haul routes traverse to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is maintained.

TII requests referral of all proposals agreed between the road authority, PPP Concessions and MMaRC Companies and the applicant impacting on national roads. Mitigation measures identified by the applicant should be included as conditions in any decision to grant permission.

With specific reference to proposed works impacting national roads, in accordance with the National Planning Framework National Strategic Outcome no. 2 'Enhanced Regional Accessibility', there is a requirement to maintain the strategic capacity and safety of the national road network. This requirement is further reflected in the National Development Plan, the National

Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

Therefore, there is a critical requirement to ensure the strategic capacity and safety of the national road network is maintained and significant Government investment already made in the national road network is safeguarded.

To give effect to such requirements, TII outlines the following matters for the Commissions consideration in the assessment of the subject proposal concerning the proposed works at the N72/L1027 Junction in particular and other minor works to the national road network in general to facilitate turbine component delivery to site;

- The proposed temporary works to the N72/L1027 Junction is for a temporary period only to facilitate turbine component delivery and thereafter any temporary access and works removed and lands reinstated. TII considers that any temporary access arrangement should be closed and lands reinstated following completion of the construction phase of development in the interests of road safety and adherence to the provisions of official policy.
- The temporary works to the N72/L1027, national road junction, should be closed off with a temporary safety barrier when not in use for turbine component delivery, as it could be misinterpreted by drivers as part of the roadway. Pending completion of construction, the temporary works shall thereafter be permanently closed and the lands reinstated.
- Any damage caused to the pavement on the existing national road at the access from the N72, national road, due to the turning movement of abnormal loads (eg. tearing of the surface course) shall be rectified in accordance with TII Pavement Standards and details in this regard shall be agreed with the Road Authority prior to the commencement of any development on site.
- It is unclear that the proposed temporary works at the N72/L1027, national road junction, has been subject to Road Safety Audit. Road user safety on the national road shall be safeguarded. A Road Safety Audit should be undertaken and recommendations of the Road Safety Audit shall be incorporated into final designs for construction and the requirements to implement the recommendations of the Road Safety Audit included as a condition on any permission granted.
- In the interests of road user safety, all works to the national road shall comply with TII Publications (formerly NRA DMRB); technical design standards for national roads.

2.2 Abnormal Weight Loads

While abnormal 'oversized' loads are addressed in the EIAR in the context of turbine component delivery route proposals, no details appear to be included in the EIAR related to abnormal 'weight' loads.

Any operator who wants to transport a vehicle or load whose weight falls outside the limits allowed by the Road Traffic (Construction Equipment & Use of Vehicles) Regulations 2003, SI 5 of 2003, must obtain a permit for its movement from each Local Authority through whose jurisdiction the vehicle shall travel.

With specific reference to national road structures on any proposed haul route, all structures should be checked by the applicant/developer to confirm that all the structures can accommodate the proposed loading associated with the delivery of development components to site where the weight of the delivery vehicle and load exceeds that permissible under the Road Traffic Regulations.

The Authority has reviewed the EIAR documentation referred and is concerned that no technical load assessment of structures appears to have been undertaken in support of this proposed

application. However, it is acknowledged that abnormal weight loads may not be a feature of the proposed development (windfarm turbine components or substation components).

While an abnormal load is defined as anything above 46 tonnes and below 180 tonnes, any load above 180 tonnes, represents an 'Exceptional Abnormal Load' ('EAL'). All structures to be crossed will need a full structural assessment by the developer in accordance with TII Publications AM-STR-06048 to verify that they can sustain any 'EAL' load safely and without any damage. Reference should be made to Department of Transport Circular RW18 of 2024 ('Exceptional Abnormal Loads') in that regard.

Full details of the transportation of all Abnormal Loads and all 'Exceptional Abnormal Loads' associated with the subject development shall be agreed with all planning and road authorities along all proposed haul routes prior to the commencement of any development.

The Authority requests referral of all proposals agreed between the road authorities and the applicant impacting on national roads.

2.3 Grid Connection Routing

Section 12.4.1.1 'Accelerate Renewable Electricity Generation' of the Climate Action Plan 2024 (CAP24) outlines the objective of reaching 80% of electricity demand from renewable sources by 2030 through a range of measures, including; *'All relevant public bodies will carry out their functions in a manner which supports the achievement of the renewable electricity targets, including, but not limited to, the use of road and rail infrastructure to provide a route for grid infrastructure where this is the optimal solution'*.

Consistent with CAP24, for all renewable energy developments requiring grid connection to the national grid, TII recommends that a full assessment of all route alternatives for grid connection takes place, including alternatives to public road, where appropriate. In TII's experience, grid connection accommodated on national roads has the potential, inter alia, to result in technical road safety issues such as differential settlement due to backfilling trenches and can impact on ability and cost of general maintenance, upgrades and safety works to existing national roads. TII respectfully requests that the Commission assess the proposed grid routing to determine that the 'optimal solution' results.

TII also refers the Commission to Department of Transport Circular RW 07 of 2025 and the 'Interim Guidance to Road Authorities (placement of Medium or High Voltage electricity assets)' which can be accessed at; <https://www.gov.ie/en/publication/ece06-electricity-transmission-infrastructure-development-roads-sector-engagement-framework-interim-guidance/>.

The 'Interim Guidance' which, as outlined in the Circular, are issued pro tem until the development of any procedures for the planning, regulation, construction and management of Medium or High Voltage cables under public roads by the 'HV Forum' and the conclusion of any outcomes from the Private Wires Consultation undertaken by the Department of Energy, Climate and Communications.

The application EIAR includes Appendix 2-6 which includes 'EirGrid 110 kV Cable installation Specifications' indicating the specifications applied to the proposed grid connection; TII notes that this document is dated 12.03.2020. As the proposed grid connection is 110kV and the EIAR states (Section 2.1) that the proposed grid infrastructure will remain as a permanent part of the national network, TII also considers that the 'Electricity Transmission Infrastructure Development – Roads Sector Engagement Framework' also included in Department of Transport Circular RW 07 of 2025 applies. DoT Circular RW 07 of 2025 does not appear to have been considered in the preparation of the subject application grid connection proposal.

In relation to the specific application, proposals for grid connection to the Dungarvan substation are noted and indicate a short section of the N72, national road, is proposed to be utilised.

In accordance with the National Planning Framework National Strategic Outcome no. 2 'Enhanced Regional Accessibility', there is a requirement to maintain the strategic capacity and

safety of the national road network. This requirement is further reflected in the National Development Plan, the National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

TII has identified a number of significant implications for TII and road authorities in the management and maintenance of the strategic national road network resulting from the laying of high voltage electricity cabling in the national road reservation, including;

- Impacts on embankments, bridges, drainage and road furniture infrastructure leading to future maintenance liabilities,
- Impediments to future maintenance and operations activities, such as safety barrier repair and French drain renewal,
- Impediments to future routine network improvements such as pavement overlay and strengthening, installation of new verge-side signs and other road furniture,
- Impacts on network traffic flows during installation,
- Impediment to future on-line upgrades of national roads because of the implications to road authority / TII in having to incur the additional costs of moving underground cables in order to accommodate the road improvements.

Proposals to lay cable in the national road reservation have the potential to impact road authorities and TII in undertaking future maintenance and improvement requirements. There may also be additional cost implications to national road improvements and maintenance resulting from the presence of high voltage cabling within the national road reservation.

Having regard to the measures identified in CAP24 and the information in relation to grid routing included in the subject application, TII recommends that the Commission is satisfied the proposed grid routing represents the optimal routing solution.

In addition to the above, the Commission will also be aware of a number of other private grid connections to the Dungarvan Substation utilising this same section of N72, national road, have been proposed, these include;

- ACP Case ref. VA93.323791 and PA93.321522 (the current application),
- ACP Case ref. PA93.318446 (Counnagappul Wind Farm),
- ACP Case ref. PA93.317265 (Dyrick Hill Wind Farm),
- ACP Case Ref. PL93.311670 (Sunrise Energy Supply Limited).

TII understands that it is not technically feasible to lay multiple electricity connections in the same section of road arising from the required separation distances. Given these four proposals, this is a serious concern which highlights the absence of a plan-led and co-ordinating mechanism for private grid connections and presents significant risk to the strategic national road network maintenance and operation as well as impacting project delivery of independently proposed renewable energy projects.

It is also unclear from the documentation submitted that the scheme proposer has sought to address these interactions between permitted and proposed connections on a national road or sought collaboration with others as part of preparation of the project development to address these concerns both for the maintenance and safety of the national road network but also for effective delivery of energy projects in this area in general.

In TII's submission on the initial windfarm application (ACP Case ref. PA93.321522), the Authority had recommended that such co-ordination issues would be addressed in any subsequent application for the proposed grid connection route. It does not appear that regard has been had to such a proposal in the current application.

TII requests that the Commission assesses the proposed grid routing to determine that the 'optimal solution' results, having regard to the foregoing considerations.

Where an 'optimal solution' for grid routing impacts the national road network, the following principles apply;

- Any cable routing should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, embankments, drainage, structures, etc. and works required to such infrastructure shall only be undertaken in consultation with and subject to the agreement of TII, any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network.
- The Commission will also note that Section 5.5 of TII Publications DN-STR-03012 (Design for Durability) requires that electricity cables 10kV or greater shall not be located on or over road structures, including buried structures. Where electricity cables 10kV or greater are required to cross a road structure they shall pass below the structure, at a sufficient depth so as to remove the potential for any impacts on the structure during operation.

2.4 Greenways

In relation to any Greenway or Active Travel proposals in the vicinity of the proposed works, consultation with Waterford City and County Councils own internal project and/or design staff is recommended.

Conclusion

It is requested that the above matters are taken into consideration prior to any decision on the subject application.

In the interests of clarification, no part of this submission shall be construed as TII giving consent to access or alter any national road infrastructure assets including drainage regimes, vehicle restraint and safety systems, ducting, HDD crossings, structures, etc.

In the event that any damage is caused by any development works to the national road or associated assets, overground or underground, costs arising to fully remediate all impacted infrastructure assets to TII Publications standards and requirements will be pursued by or on behalf of TII.

The Authority trusts that the foregoing comments prove of assistance to the Commission in dealing with this matter.

Yours faithfully,



Michael McCormack
Senior Land Use Planner