TOBIN

Case Number ABP – 321522-24
Scart Mountain Grid Connection
Response to Submissions Report

Ireland FuturEnergy

BUILT ON KNOWLEDGE

Document Control Sheet	
Document Reference	Scart Mountain Grid Connection Response to Submissions Report
Client:	FuturEnergy Scart Mountain Designated Activity Company Limited
Project Reference	11303

Rev	Description	Author	Date	Reviewer	Date	Approval	Date
A01	Final	JS, JF, JD, TG, DB, CD, FB, MR	29/04/2026	JS	29/04/2026	JS	29/04/2026

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1. INTRODUCTION

1.1 PURPOSE OF THIS REPORT

This response to submissions document has been prepared in response to a letter from An Coimisiún Pleanála (ACP) dated 18th December 2025, inviting the applicant (FuturEnergy Scart Mountain Designated Activity Company Limited) to respond to the observations received in respect of a planning application for the proposed Scart Mountain Grid Connection development (case number ACP-323791-25).

We consider that the following responses address all the matters raised in the submissions/observations.

It should be noted that a number of the submissions contained comments and observations relating to the separately proposed Scart Mountain Wind Farm development (case number ABP-322485-25). As this document relates only to the proposed grid connection, we have not addressed these directly in this response. They have generally been addressed as part of a previous response to submissions report on the proposed Scart Mountain Wind Farm development application (submitted on the 19th December 2024). That response report was submitted to the Coimisiún on the 19th December 2025.

1.1.1 Key Definitions

The terminology used in this document is aligned to the terminology that is employed in the submitted Environmental Impact Assessment Report (EIAR), including the terms defined in Chapter 1.

Notably, the term "proposed project" refers to the entire project which comprises a wind farm of 15 no. wind turbines and all associated infrastructure including turbine foundations, hardstanding areas, borrow pits, access tracks, 110kV grid connection and works along the road network for turbine/material delivery. This proposed project has been subject to two main planning applications. The first was for the wind farm itself, along with some works on the turbine delivery route and the proposed onsite substation. The second application is the one to which this document relates, and it covers the proposed 110kV grid connection. The term "proposed development" refers only to the elements for which planning permission is being sought as part of this application, however both the submitted EIAR and the Natura Impact Statement (NIS) consider the combined impacts of these individual elements of the Proposed Project.

The classification and description of effects in the EIAR follows the terms provided in Table 3-4 of the 2022 EPA Guidelines and are duplicated in Table 1-1 of the EIAR for reference.

A summary of defined terms with regard to the Landscape and Visual Impact Assessment (LVIA) study area that are used in responses to some items (specifically Sections 2.2.1 to 2.2.3) is as follows:

- Site and Immediate Study Area – the proposed wind farm site and immediate surrounding landscape up to 1km.
- Central Study Area – areas outside of the site and immediate study area up to 5km from the proposed turbine array.

- Wider Study Area – parts of the surrounding landscape between 5-20km from the proposed turbine array.

1.2 SUBMISSIONS RECEIVED

The following table lists the submissions received from ACP in respect of this proposed development.

Table 1.1: Submissions Received

ACP Ref.	Observation Made By
1	An Taisce
2	Development Applications Unit
3	Transport Infrastructure Ireland
4	Uisce Éireann
5	Waterford City and County Council
6	Daniel Bray
7	Emma Sheridan
8	Helen Hickey
9	JP Fitzpatrick
10	Keith Revels and Jonathan Young
11	Knockmealdown Protection Organisation CLG
12	Liam Lacey
13	Modeligo Community Development Group
14	Nicola Windsor Smith
15	Richard Sheehan

1.3 FORMAT OF RESPONSE

This response document firstly addresses the themes raised in the prescribed body submissions followed by the third-party submissions. Each theme is discussed in a specific section of this response. The submissions contain a large number of comments. Although many comments do not necessitate response, it should not be taken that the applicant accepts or agrees with those comments. This submission has focused on the points raised under each theme where a response may be helpful for ACP in making a determination on the application.

All specialists involved in the preparation of the submitted planning application (ACP-323791-25) documentation have had an opportunity to review each of the individual observations and have provided a technical response to the items relevant to their area of expertise, where appropriate.

2. RESPONSE TO OBSERVATIONS

2.1 PRESCRIBED BODIES

2.1.1 Transport Infrastructure Ireland

2.1.1.1 Alternative GCR options

Transport Infrastructure Ireland (TII) suggest that a full assessment of the grid connection options be carried out, including the use of private lands, in order to ascertain that the proposed route is indeed the most appropriate route. They highlighted concerns regarding potential damage to the road network from cable installation. The construction methodology for works on the roads is provided in Appendix 2-5 of the submitted EIAR (Grid Connection Construction Methodology). The implementation of this methodology will mitigate the risks concerning damage to the road network.

The comparison of alternatives was carried out in Section 3.3.3.3 of Chapter 3 of the submitted EIAR (Reasonable Alternatives). This looked at four alternative grid route options, and it demonstrates that the chosen grid route was the most appropriate option having regard to the effects of the project on the environment (i.e. Population and Human Health, Traffic, etc.),

These grid route options were described as:

- Alternative grid connection routes mostly via the N72 (see black and pink in Figure 1 below)
- Alternative grid connection routes via local/regional roads from the eastern side of the proposed wind farm site (see orange in Figure 1 below)
- Alternative grid connection routes – short sections (see light blue, grey and dashed red in Figure 1 below)
- Alternative grid connection routes – (see turquoise in Figure 2-1 below)

It should be noted that Figure 3-5 was incorrectly labelled as Figure 3-4 in the EIAR due to a typographical error, and the routes did not all display clearly in the map. They are shown more clearly in Figure 1 below. The findings of the assessment however were unaffected by this issue and they remain valid. The proposed grid connection route is the most appropriate option for the route.

While the proposed grid route (which is considered the optimal solution) does utilise the national road network on its final approach to the existing Dungarvan 110kV substation, this is restricted to approximately 250m in length. The Applicant has chosen a grid route that largely avoids the national road network as a result of the preferences of TII, limiting it to the shortest possible distance. The Applicant did seek to obtain consents for a cross-country cable option to access the substation, however this was not possible as an agreement could not be reached with a key landowner. Therefore, the only way that any cables can access the existing Dungarvan 110kV substation is within the national road network. An important note in this regard relates to Section 12.4.1 of the Climate Action Plan (CAP) 24 (Measures to Meet the Challenge) which states the following, inter alia, with respect to reaching 80% of electricity demand from renewable by 2030 (emphasis added):

"All relevant public bodies will carry out their function 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****"*

Significantly. CAP25 is to be read in conjunction with CAP24, meaning that the above measure remains an objective with respect to the provision of grid infrastructure.

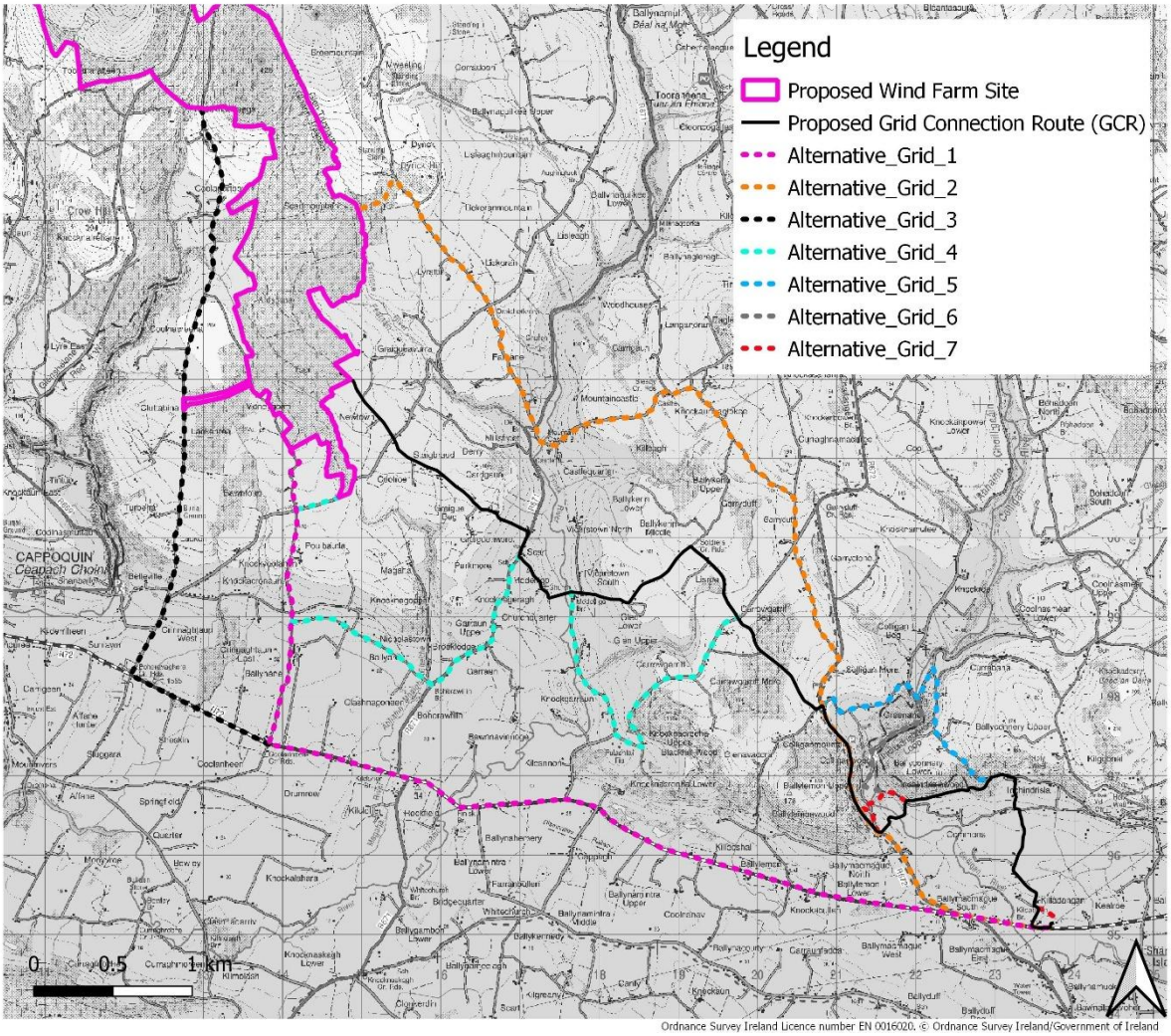

Figure 1 Updated version of Figure 3-5 in Chapter 3 of the Submitted EIAR (Consideration of Alternatives) to provide clarity on the alternative routes being assessed. Title: Alternatives to the proposed Grid Connection Route

2.1.1.2 ABNORMAL AND EXCEPTIONAL LOADS

Transport Infrastructure Ireland indicated that, in relation to abnormal load delivery to the site, its position remains as set out in its submission on the initial wind farm application (ACP Case Ref. PA93.321522). The Applicant notes that these matters relate to turbine delivery associated with the wind farm development. However, the current application relates solely to the GCR which comprises the installation of an underground cable within existing road corridors.

No turbine components or other abnormal indivisible loads are required/ to be delivered for the GCR works. Construction traffic will consist primarily of standard construction HGVs operating within normal legal weight limits, together with light and medium-sized vehicles transporting cable drums, ducts, plant, equipment, and personnel. Accordingly, issues relating to turbine delivery, abnormal oversized loads, and abnormal weight loads are not applicable to the GCR application.

2.1.1.3 PROTECTION OF SAFETY, INTEGRITY, AND OPERATIONAL FUNCTION OF NATIONAL ROADS

Transport Infrastructure Ireland raised concerns regarding the installation of high-voltage electricity cabling within the national road reservation and the potential implications for the safety, structural integrity, operation, and long-term management of the strategic national road network. Reference was made to national planning and transport policy objectives requiring the protection of the capacity and safety of national roads, as well as to potential technical issues associated with trench excavation and reinstatement, including differential settlement. The Authority also highlighted possible impacts on embankments, bridges, drainage systems, and roadside infrastructure; constraints on routine maintenance, safety works, and future upgrades; potential disruption to traffic during installation; and the risk of additional costs and liabilities for road authorities arising from the presence of underground high-voltage infrastructure within the road corridor. The Authority requested that the proposed grid routing be assessed to ensure that an optimal solution is achieved.

The Applicant acknowledges the concerns regarding the installation of high-voltage electricity infrastructure within the national road reservation and the need to protect the strategic function, safety, and operational integrity of the national road network, as reflected in national planning and transport policy, including the National Planning Framework, the National Development Plan, the National Investment Framework for Transport in Ireland, and the Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

The GCR has been designed, insofar as practicable, to follow existing road corridors in order to minimise impacts on private lands, environmental receptors, and landscape character. Where the route interfaces with the national road network (this only occurs for approximately 250 metres), the detailed design and installation methodology will be subject to agreement with Waterford City and County Council and Transport Infrastructure Ireland.

Construction works within the road reservation will be temporary and carried out under the appropriate statutory approvals, including Road Opening Licences. All trenching, duct installation, backfilling, and reinstatement will be undertaken in accordance with applicable standards to ensure that the structural integrity and long-term performance of the road pavement, embankments, drainage systems, and associated infrastructure are maintained, thereby avoiding adverse effects such as differential settlement.

At detailed design stage, matters such as cable alignment, depth of cover, separation from existing utilities and road assets, and provision for future access will be addressed to minimise any constraints on routine maintenance, safety works, or future upgrades of the road network. Traffic management measures during installation will be agreed in advance with the relevant road authorities to maintain traffic flows and ensure road user safety.

Should permission be granted, the Applicant will continue to liaise with the road authorities throughout design and construction to ensure that the installation does not give rise to undue constraints on future maintenance, renewal, or improvement works, nor impose significant additional liabilities. The proposed works are therefore not expected to adversely affect the long-term operation or strategic capacity of the national road network.

2.1.1.4 OPTIMAL GRID ROUTING – CONSIDERATION OF ALTERNATIVES

TII stated that, having regard to the measures identified in CAP24 and the information provided in relation to the grid routing in the application, it recommends that the Commission satisfy itself that the proposed grid routing represents the optimal routing solution.

The Applicant confirms that alternative routing options were considered as part of the design process, with the selected route representing the most feasible solution when environmental, technical, land use, and planning constraints are taken into account. Routing within existing road corridors minimises impacts on private land, habitats, and landscape character.

The selection of the GCR and connection point is described in detail in the submitted EIAR. In particular, Section 3.3.3.3 (Chapter 3) outlines the alternatives considered and the rationale for the chosen route, including engineering feasibility, environmental constraints, land use considerations, and infrastructure interfaces.

2.1.1.5 CUMULATIVE EFFECTS AND COORDINATION OF MULTIPLE GRID CONNECTIONS ON THE NATIONAL ROAD NETWORK

Transport Infrastructure Ireland indicated that it is unclear from the submitted documentation whether the Applicant has addressed potential interactions between permitted and proposed grid connections affecting the national road network, or undertaken collaboration with other project promoters during project development. The Authority noted that such coordination is important to safeguard the maintenance, safety, and operational integrity of the national road network and to facilitate the effective delivery of energy infrastructure projects in the area.

The Authority further highlighted that a number of other private grid connections to the Dungarvan Substation have been proposed utilising the same section of the N72 national road, including proposals associated with the Coumnagappul Wind Farm, Dyrick Hill Wind Farm, Sunrise Energy Supply Limited, and the current application. It noted that accommodating multiple electricity connections within the same road corridor may not be technically feasible due to required separation distances between services. In the absence of a coordinated or plan-led approach to private grid connections, the Authority expressed concern that these proposals could present risks to the maintenance, safety, and operation of the strategic national road network, as well as potentially affecting the delivery of independently proposed renewable energy projects.

From a transport perspective, a cumulative assessment of other approved and proposed developments in the area was undertaken and is presented in EIAR Chapter 16, Section 16.6 — Cumulative Effects. This assessment considers potential interactions on the road network, including traffic and infrastructure impacts, and concludes that cumulative effects can be managed through appropriate mitigation and traffic management measures.

The Applicant acknowledges the concerns regarding multiple proposed grid connections to the Dungarvan Substation utilising sections of the N72 national road. It is noted, however, that two of the developments referenced — the Dyrick Hill Wind Farm and the Coumnagappul Wind Farm — have since been refused planning permission and therefore no longer constitute committed or likely future connections. As such, these projects do not give rise to cumulative infrastructure constraints along the N72.

Notwithstanding this, the detailed design, routing, and installation of the proposed GCR will be subject to agreement with Waterford City and County Council and Transport Infrastructure Ireland. This process will ensure that matters such as separation distances between services, road integrity, safety, maintenance requirements, and operational considerations are appropriately addressed. Should permission be granted, the Applicant will continue to coordinate with relevant stakeholders to ensure that the installation of the proposed infrastructure does not adversely affect the strategic function, maintenance, or safety of the national road network.

2.1.1.6 COMPLIANCE WITH DEPARTMENT OF TRANSPORT CIRCULAR RW 07 OF 2025

TII noted that the EIAR includes Appendix 2-6 containing the EirGrid 110 kV Cable Installation Specifications dated 12 March 2020, which outlines the specifications applied to the proposed grid connection. Given that the proposed infrastructure comprises a permanent 110 kV transmission connection forming part of the national electricity network, the Authority indicated that the Electricity Transmission Infrastructure Development — Roads Sector Engagement Framework, as set out in Department of Transport Circular RW 07 of 2025, is also applicable. The Authority considered that this Circular does not appear to have been taken into account in the preparation of the grid connection proposal

The Applicant notes TII's reference to Appendix 2-6 of the EIAR and the inclusion of the EirGrid 110 kV Cable Installation Specifications (12.03.2020).

The proposed grid connection will be designed, constructed, and maintained in accordance with current EirGrid standards and all applicable statutory requirements. The Applicant acknowledges the interim nature of the Electricity Transmission Infrastructure Development – Roads Sector Engagement Framework, as set out in Department of Transport Circular RW 07 of 2025. In this regard, the Applicant also notes the explicit recognition within the Climate Action Plan 2024 (Section 12.4.1) of the importance of utilising existing road and rail infrastructure corridors to facilitate grid infrastructure delivery. Furthermore, regard is had to the obligations of Transport Infrastructure Ireland under Section 15 of the Roads Act 1993 (as amended by the CALCDA). Against this policy and legislative context, the proposed grid route has been identified as the optimal solution.

Engagement with relevant road authorities, including Waterford City and County Council and Transport Infrastructure Ireland, will continue throughout the detailed design and pre-construction phases to ensure compliance with all applicable guidance and requirements, including those set out in Circular RW 07 of 2025 where relevant.

Works within the national road network will be subject to the appropriate statutory approvals, including Road Opening Licences and any additional consents required by TII.

2.1.2 Uisce Éireann

2.1.2.1 Confirmation of Feasibility

It was stated by Uisce Éireann in their submission that the associated designs need to be agreed with the Uisce Éireann Diversions team, and that a Confirmation of Feasibility must be issued and included in this response. They requested that, where appropriate, an associated Build Over Agreement / Diversion Agreement will need to be executed between the Applicant and Uisce Éireann.

The Applicant has proactively engaged with the Uisce Éireann Diversions team to ensure the protection and integrity of all public water and wastewater assets along the GCR. In direct response to the requirements outlined by Uisce Éireann, a Confirmation of Feasibility has been secured and is included as Appendix A to this response document. This document confirms that a proposed Build Over or Near in relation to the proposed grid connection works can be facilitated, subject to a valid agreement(s) being put in place.

The letter advises the Applicant to contact the diversions team within Uisce Éireann once planning permission has been granted and prior to any works commencing on site in order to enter into a Build Over or Near agreement with Uisce Éireann. The Applicant commits to arrange such agreements prior to the commencement of any works on site.

All construction activities will be carried out in strict accordance with Uisce Éireann's Standard Details and Codes of Practice, ensuring that the structural integrity of the public water network is maintained throughout the project duration.

2.1.3 Development Applications Unit (NPWS)

2.1.3.1 Archaeology and Cultural Heritage

The departmental submission notes that Chapter 15 of the EIAR addresses archaeology and cultural heritage. It notes that 'all mitigation measures in relation to archaeology and cultural heritage, as set out in Chapter 15 of the EIAR shall be implemented in full….'. This is noted and accepted by the applicant. They also note some requirements for archaeology (testing, reporting, etc.) for the project Construction Environmental Management Plan (CEMP). The submitted CEMP (Appendix 2-8) will be updated prior to the start of construction to account for these and other comments/conditions.

2.1.4 An Taisce

2.1.4.1 NIS / Aquatic Environment

An Taisce submitted one observation concerning the HDD methodology. This observation raised concerns about the use of drilling fluids e.g. bentonite and its potential effect on Blackwater River (Cork/Waterford) SAC. This concern is fully addressed in Section 2.1.4.2 of this response. In addition, HDD bentonite mitigation measures are listed in Section 6.2.1.2.1 Sediment Control Measures, 6.2.1.2.2 Pollution Control Measures and 6.2.1.2.3 Horizontal Directional Drilling Measures (of Section 6 of the submitted NIS).

An ECoW will oversee the works to ensure the mitigation measures are implemented correctly and will have the mandate to stop any works immediately if any adverse effects are observed as described in Section 6.2.1.5 Roles and Responsibilities of Section 6 of the submitted NIS.

As described in Section 7 (Conclusion) of the submitted NIS, following the application of the detailed mitigation measures, potential adverse effects will be avoided, and it can be determined that there will be no risk of adverse effects on the qualifying interest habitats and species, or on overall site integrity in light of the conservation objectives for the Blackwater River (Cork/Waterford) SAC, the Blackwater Estuary SPA and the Dungarvan Harbour SPA.

2.1.4.2 HDD Crossings and Bentonite

An Taisce raised concern relating to the risk associated with contamination from bentonite used for HDDs, which are hydrologically connected to EU sites. One of the observations raised concerns that bentonite can contain bacteria and metals such as lead, arsenic and mercury, and stated that soil permeability may be reduced, which may impact on aquatic biodiversity.

The applicant acknowledges the potential for inadvertent returns (frac-out) during Horizontal Directional Drilling (HDD). While bentonite-based drilling fluid will be utilised to ensure borehole stability, the proposed project has been rigorously assessed in accordance with Article 6(3) of the Habitats Directive and Article 4 of the Water Framework Directive (WFD).

The potential for frac-out, although unlikely, was a core consideration in the design of the crossing methodology for all of the watercourses. The absence of adverse effects on the integrity of the HDD works locations is ensured through stringent mitigation measures, as detailed in Section 9.5 of Chapter 9 (Hydrology) and the CEMP (appendix 2-8) of the submitted EIAR. HDD profiles have been designed with a minimum separation depth (typically >2.5m below the riverbed) to provide a sufficient confining pressure of overburden, significantly reducing the risk of frac-out in the watercourse. The bentonite utilised will be of high-grade, NSF-certified environmental quality. As an inert, non-toxic natural clay, its risk profile is significantly lower than synthetic alternatives. During drilling, the 'annular pressure' will be continuously monitored. Any sudden drop in pressure (an early indicator of potential frac-out) will trigger an immediate cessation of drilling activities. In the event of frac-out occurring, work will cease and an emergency containment plan will be implemented.

By avoiding all instream works and implementing a closed-loop system for drilling fluids, the proposal ensures no deterioration of the waterbody status, thereby satisfying the requirements of Article 4 of the WFD.

Furthermore, HDDs are a standard method utilised to prevent direct effects on streams. The preference for HDD is laid out in the Inland Fisheries Ireland (2016): Guidelines on Protection of Fisheries during Construction Works in and Adjacent to Watercourses. Bentonite is an inert material used both in HDD drilling and other drilling works including water wells as detailed in the IGI Water Well guidance[1]. Bentonite is a natural clay material that is chemically inert, non-toxic, and biodegradable. There are no significant residual risks associated with the proposed HDD crossings and bentonite use.

[1] https://igi.ie/assets/files/Water%20Well%20Guidelines/Guidelines.pdf

2.1.5 Waterford City & County Council

2.1.5.1 Interdependent Projects

Waterford City and County Council's position in their observation is that because the grid connection and the separately proposed Scart Mountain Wind Farm (ABP Ref. 321522) are interdependent projects, their recommendation to refuse the wind farm remains a material consideration and guides their current recommendation that permission also be refused for the currently proposed grid connection.

While the two projects are indeed interdependent, the current application is a standalone SID application submitted under Section 182A of the Planning and Development Act 2000 (as amended). While the project is intended to facilitate the wind farm, the technical and environmental suitability of the GCR must be assessed on its own merits, particularly its compliance with the Waterford City and County Development Plan 2022–2028.

Waterford City and County Council expresses support for renewable energy transmission and distribution infrastructure under Policy Objective UTL13. The Applicant maintains that the grid connection is a critical piece of strategic infrastructure that directly implements this policy by enabling the transition to a low-carbon economy.

To address the interdependence mentioned by the Council and to comply with the EIA directive, a single EIAR and NIS were prepared for the entire proposed project (including the proposed wind farm and grid connection). This ensures that ACP has a complete picture of the potential effects.

The grid connection is essential for the delivery of the 4.2GW of onshore wind required by the Climate Action Plan 2025. A refusal of the grid connection solely on the basis of a pending decision on the wind farm would create a circularity that delays the delivery of national renewable energy targets.

The Applicant respectfully submits that the grid connection is technically robust, avoids significant environmental effects, and should be granted permission to ensure that the infrastructure is ready to support the national grid as soon as the associated generation project is approved and finalised.

2.1.5.2 Suggested conditions

Waterford City and County Council's observation also includes a number of suggested conditions in the event that ACP consent the proposed development. The Applicant confirms that they accept these conditions if they are included.

2.1.5.3 TDR works

There was a comment in the observation that some works associated with the overall proposed project will need to be permitted at some roundabouts for the Turbine Delivery Route (TDR). This work will need to be consented separately and is not directly associated with the current proposed development of the GCR.

2.1.5.4 Alternative GCR options

There was also a comment that alternatives to the proposed development should be considered. This has been addressed in Section 2.1.1.1 of this document.

2.1.5.5 ROADS, TRAFFIC MANAGEMENT, AND CONSTRUCTION

Waterford City and County Council noted that Section 2.4 of the Planning Report describes the proposed cable works and that a suite of drawings has been submitted illustrating the route and details of the development. The Authority further noted that a Traffic Management Plan (TMP) is included within the EIAR and indicated that it is generally satisfied that the road network serving the proposed development is capable of accommodating the grid connection works. It recommended that, should permission be granted, standard conditions be applied in relation to the preparation of a CEMP and the implementation of mitigation measures set out in the EIAR. The Authority also advised that the development will be subject to a Roads Opening Licence and that a special development contribution is recommended.

The Applicant welcomes the Planning Authority's acknowledgement that the road network is capable of accommodating the proposed grid connection works.

The Applicant confirms that, should permission be granted, the CEMP, as set out in Appendix 2-8 of the submitted EIAR, will be updated and implemented in accordance with the mitigation measures set out in the EIAR and any conditions attached to a grant of permission.

All works within the public road will be undertaken under a Road Opening Licence issued by Waterford City and County Council and in full compliance with the Council's requirements, including reinstatement standards. The Applicant also acknowledges the requirement for a special development contribution, where applicable.

2.1.5.6 PRE-CONSTRUCTION TRAFFIC MANAGEMENT REQUIREMENTS

Waterford City and County Council recommended that, should permission be granted, an appropriate condition be attached requiring compliance with the transportation requirements of the Planning Authority prior to the commencement of development. The Authority indicated that this would include the preparation of a detailed Traffic Management Plan, incorporating consultation with Transport Infrastructure Ireland, relevant road authorities, and utility providers; details of haulage routes and any control measures for abnormal or oversized vehicles; a road and bridge condition survey along the haul routes at the developer's expense; arrangements for the reinstatement of any construction-related damage; proposals for temporary traffic management measures and communication protocols to keep residents informed; construction route signage; and confirmation of required Road Opening Licences. The purpose of these measures is to ensure the safety of road users and pedestrians during the construction phase.

The Applicant confirms that a detailed Traffic Management Plan (TMP) will be prepared and agreed with Waterford City and County Council prior to the commencement of development. This TMP will be informed by, and developed from, the initial TMP submitted as Appendix 2-4 of the submitted EIAR.

The TMP will address all items identified by the Planning Authority, including:

- Consultation with Transport Infrastructure Ireland and all relevant stakeholders,

- Confirmation of haulage routes and abnormal load management procedures,
- Pre-construction Road and bridge condition surveys along haul routes,
- Measures for repair of any construction-related damage,
- Detailed temporary traffic management arrangements to maintain safety and access,
- Communication protocols to keep residents informed of works and any temporary restrictions,
- Provision of construction route signage,
- Obtaining all required Road Opening Licences from Waterford City and County Council.

These measures are consistent with the mitigation framework outlined in the EIAR. The final TMP will ensure that construction traffic impacts are effectively managed and that the safety of road users, pedestrians, and local communities is protected throughout the construction period.

2.1.5.7 Archaeology and Cultural Heritage

Page 9 of the Waterford City and County Council submission notes that four recorded monuments are located within 50m of the proposed GCR. It states that archaeological testing is required at these locations. The proposed GCR will not directly impact these sites but will pass adjacent to them within the existing road network. Archaeological monitoring at these locations is detailed in Chapter 15 of the EIAR and these mitigation measures have been endorsed in the submission by the National Monuments Service of the DoHLGH. Archaeological monitoring will be carried out under licence, as issued by the National Monuments Service of the DoHLGH.

The submission also states that features of local industrial heritage interest may be found along the road boundaries of the rural road network along which the GCR is proposed. It states that the route shall be surveyed in accordance with TII Guidelines on Cultural Heritage Impact Assessment (2024). The route of the proposed GCR has already been assessed as part of Chapter 15 with a full baseline assessment and field inspection. TII Guidance, which is relevant to roads and greenways, does not state a higher level of assessment than the assessment that has already been carried out.

The submission notes the importance of townland boundaries and states that any earthen banks or stone walls that may be impacted by the proposed GCR, be reinstated on completion of construction works. This is noted and accepted by the applicant.

2.1.5.8 Natura Impact Statement

Waterford City & County Council (WCCC) submitted one observation concerning the Natura Impact Statement (NIS). The NIS concludes:

'In absence of mitigation, the potential risks to the Blackwater River (Cork/Waterford) SAC, the Blackwater Estuary SPA and the Dungarvan Harbour SPA is the potential reduction in water quality and barrier to commuting otter. However, following the application of the detailed mitigation measures, potential adverse effects will be avoided, and it can be determined that there will be no risk of adverse effects on the qualifying interest habitats and species, or on overall site integrity in light of the conservation objectives for the Blackwater River (Cork/Waterford) SAC, the Blackwater Estuary SPA and the Dungarvan Harbour SPA.

There will be no adverse effects on the integrity of any European sites during development and operation of the proposed project, either alone or in-combination with any other plans or projects.'

The Waterford City County Council Heritage Officer was satisfied with the mitigation measures as described in Table 6-2 of Section 6 of the submitted NIS.

2.1.5.9 Aquatic Environment

WCCC submitted one observation concerning Horizontal Directional Drilling (HDD) for the Grid Connection Route (GCR) crossing of the Colligan River.

For a reply to this observation please refer to Section 2.1.4.2 of this submission response document.

2.1.5.10 Mammals and Breeding Birds

WCCC submitted one observation concerning HDD locations for the GCR. WCCC states that prior to the HDD taking place, confirmatory pre-construction otter and breeding bird surveys will need to be carried out. Confirmatory pre-construction otter surveys are described in Section 6.9.3.1 of Chapter 6 (Biodiversity) and the CEMP (Appendix 2-8) of the submitted EIAR and confirmatory pre-construction breeding bird surveys are described in Section 7.5.2 of Chapter 7 (Ornithology) and the CEMP (Appendix 2-8) of the submitted EIAR.

These species-specific confirmatory pre-construction surveys will identify the presence or absence of otter and breeding birds prior to construction works commencing. In the event that significant otter or breeding bird signs are recorded, bespoke mitigation measures (based on the mitigation measures described in Section 6.8.1.4 of Chapter 6 (Biodiversity) of the submitted EIAR) will be taken to avoid impact and if this is not possible a derogation license will be applied for with the NPWS.

2.2 THIRD PARTY SUBMISSIONS

Within the third party submissions the concerns and themes have been reviewed and are addressed within the relevant sections herein.

2.2.1 Perceived unsuitable nature of the proposed grid connection facilities in a landscape classified as most sensitive

The submitted LVIA fully recognises the 'most sensitive' landscape classification identified in the Landscape Policy, Context and Designations section of the submitted report, which is illustrated on Figure 2 below. However, it is important to note that the proposed grid connection, is located outside of this designation and instead lies within an area classified as having 'Low' landscape sensitivity. This 'low' sensitivity classification is defined in Appendix 8 of the Waterford City and County Development Plan 2022–2028 as areas that "*have the potential to absorb a wide range of new developments, subject to normal planning and development control procedures.*"

While the designations outlined in the current County Development Plan are noted, in accordance with the guidance set out in the Guidelines for Landscape and Visual Impact Assessment (GLVIA3, 2013), the submitted LVIA also undertakes an independent assessment of landscape sensitivity (see Subsection 13.6.1 of the report). Overall, the sensitivity of the central study area (up to 5km from the separately proposed turbines associated with this project) was assessed as Medium, with some localised areas of higher sensitivity. Whilst the

central study area comprises more consistent landscape areas and types, the wider study area (extending from 5–20km from the separately proposed wind farm site) comprises a variety of contrasting landscape areas and types and was assessed as having an overall Medium landscape sensitivity, with some notable areas of High and Very High sensitivity. These higher sensitivity areas are primarily associated with more elevated and remote upland landscapes, which are well removed from the proposed grid connection facilities.

With specific reference to the grid connection facilities, these are located within the southern extent of both the central and wider study areas, which are considered among the more robust and typical parts of the surrounding landscape, reinforced by the 'low' landscape sensitivity classification outlined in the current Waterford County Development Plan (refer to Figure 2 below). In this part of the study area, the predominant land use is pastoral farmland, and the landforms are generally less distinctive than those found within the eastern, northern and western extents of the wider study area. Overall, the grid connection route is primarily influenced by robust, working rural landscapes that are not considered to be particularly rare or distinctive. This characterisation is consistent with the 'Low' sensitivity classification assigned to this area within the current Waterford County Development Plan.

With regard to the suitability of the proposed development within the receiving landscape context, it is not considered that the proposed grid connection facilities will give rise to undue landscape or visual effects, especially considered that the proposed grid infrastructure will be located below ground.

While the development will involve the transition of a small area of productive farmland to a more anthropogenic land use, the proposed grid connection will not materially alter the prevailing landscape structure.

Furthermore, it is important to note that the proposed grid connection infrastructure is entirely located within an area of the surrounding landscape classified as having 'Low' landscape sensitivity under the current Waterford County Development Plan. In this context, the proposed development is not considered to represent an inappropriate or unsuitable form of development within the receiving landscape.

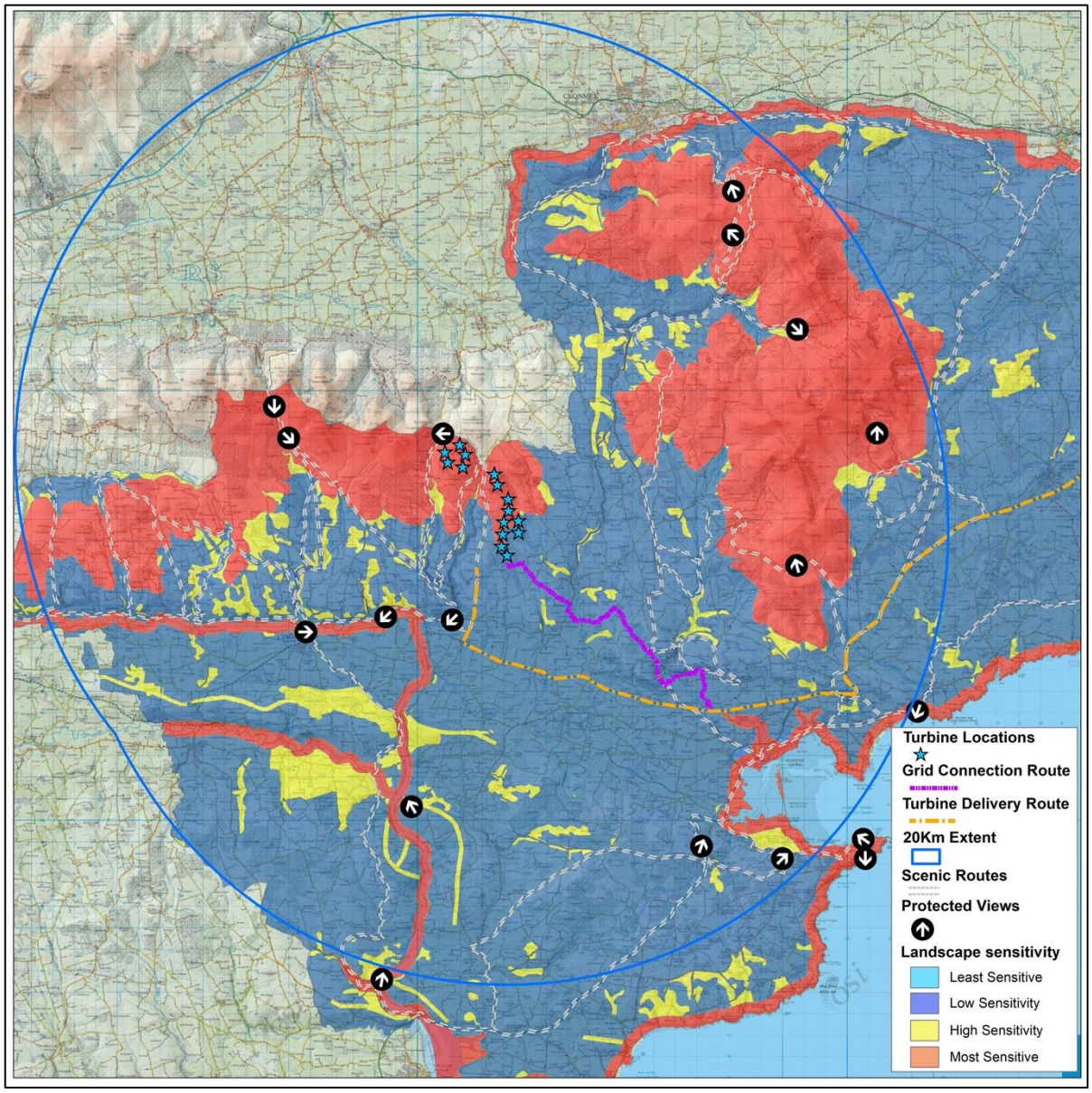

Figure 2 Excerpt from the Current Waterford City and County Development Plan 2022-2028 map viewer showing landscape sensitivity classifications in relation to the proposed project

2.2.2 Perceived location of the proposed Grid Connection facilities within an 'exclusion' wind energy zoning

In a similar context to the landscape sensitivity zoning discussed above, it is also important to note (as per Subsection 13.3.2.2 of the submitted LVIA and in Figure 2-3 below), the proposed grid connection elements of the project, are located within a 'preferred' wind energy zoning designation.

Overall, it is considered that these lands can well accommodate the proposed grid connection infrastructure as indicated by the 'preferred' wind energy classification and aforementioned 'low' landscape sensitivity classification.

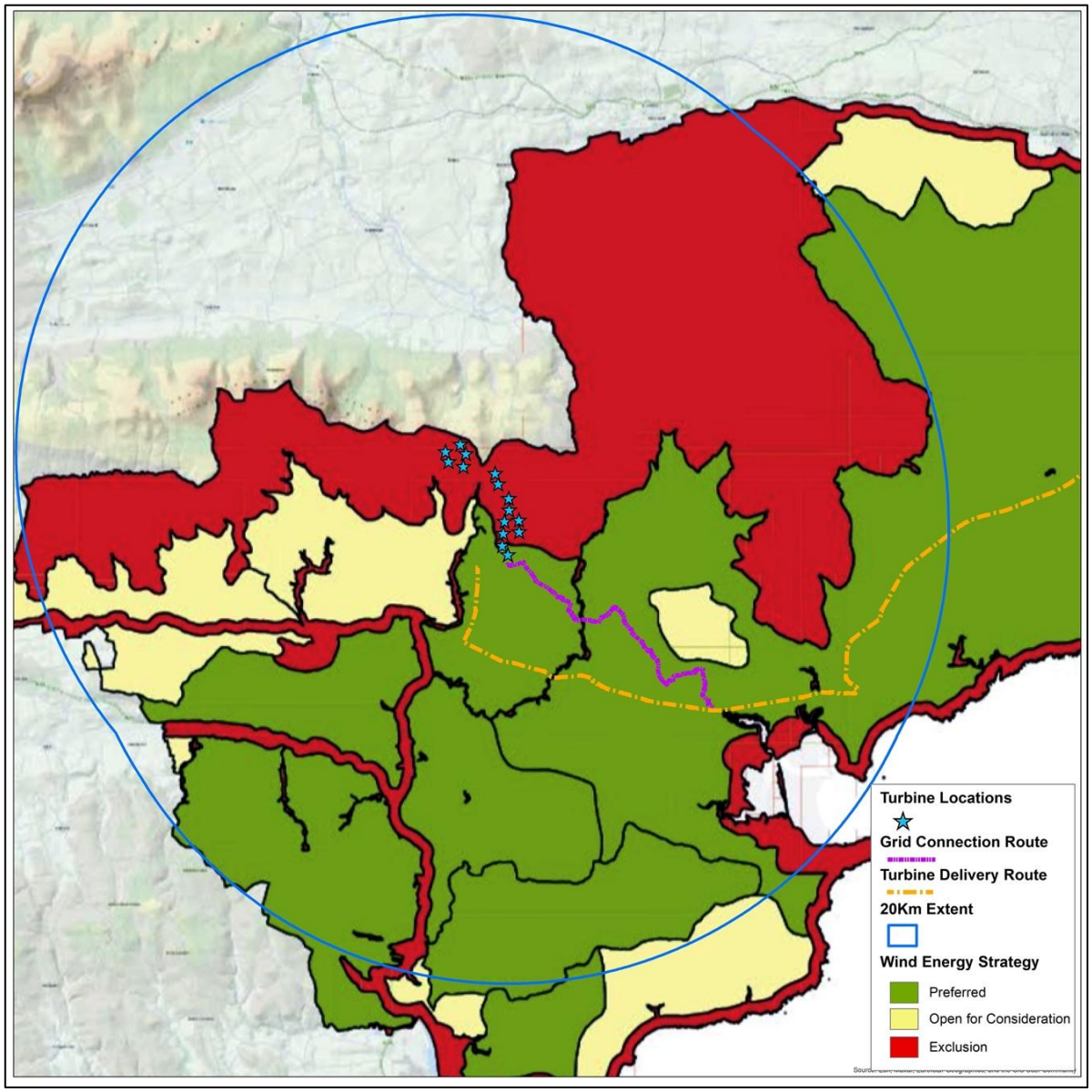

Figure 2-3 Excerpt from Appendix 2 of the current Renewable Energy Strategy showing wind energy classification areas in relation to the proposed turbines and grid connection

2.2.3 Negative effects generated by the proposed grid connection at surrounding recreational and tourism receptors such as st. Declan's way

With regard to potential effects on surrounding recreational and tourism receptors, it should be noted that the submitted LVIA (refer to EIAR Chapter 13) fully accounts for the varied landscape values present within the study area. Due to the notable extent of upland landscapes in the surrounding area, the study area encompasses distinct landscape values relating to amenity and heritage, which are strongly associated with the Knockmealdown Mountains and the Comeragh Mountains. Subsection 13.3.3.5 of the submitted LVIA outlines the tourism, recreation and heritage features within the study area and clearly identifies the considerable number of recreational amenity routes present.

Section 13.6.1 of the submitted LVIA provides a comprehensive summary of landscape character, value and sensitivity across the study area, which is influenced by the presence of numerous recreational amenity receptors. With specific reference to the central study area, the LVIA notes:

> *"some distinct landscape values relating to amenity and heritage strongly associated with the Knockmealdown Mountains. A collection of local looped trails and a section of the East Munster National Waymarked Trail are located in the northwest quadrant of the central study area along the north-facing slopes of the Knockmealdown Mountains, whilst a looped woodland walking trail is located along the Glenshelane River Valley in the southwest aspect of the central study area. In terms of heritage, the most prominent heritage receptor in the central study area relates to Mount Mellary Abbey, which is a striking building that dates back to the early 1800s and is perched on elevated lands on the southern flank of the Knockmealdown Mountain foothills. Broad panoramic views are afforded across the southern extents of County Waterford from the front of the Abbey, whilst a section of St. Declans Way Pilgrim Path passes through Mount Mellary and across the Knockmealdown Mountains to the north."*

As with designated scenic views and prospects, all tourism, amenity and heritage receptors considered relevant to the proposed project are represented by viewpoints within the LVIA. In total, ten representative viewpoints were selected to represent tourism, amenity and heritage receptors across the study area. The significance of visual effect at these receptors ranged between Moderate-slight to Slight-imperceptible, however, it should be noted that visual effects at these receptors were principally associated with views of the proposed turbines as opposed to the proposed grid connection, which will be underground.

With specific reference to the proposed grid connection infrastructure, due to the underground nature of the grid connection cabling, it is not considered that these elements of the proposed project will give rise to notable visual effects at many of these receptors. This is particularly the case given that the majority of these receptors are located at a considerable distance from the grid connection infrastructure. Notwithstanding this, some of these receptors will afford visibility of the separately proposed wind turbines associated with the proposed Scart Mountain Wind Farm, which may result in some adverse visual effects. However, as set out in the submitted LVIA, these effects have been assessed as Not Significant.

2.2.4 Excavated Material

One observation suggested that the stone which is to be sourced for the proposed project (i.e. the proposed wind farm, GCR, etc.) was not specified in terms of where it would come from. The reader should refer to Section 2.8.8.4 of Chapter 2 (Description of the Proposed Project) which details the volumes required and specifies the source for each (i.e. Onsite or offsite). The onsite borrow pit has been assessed in full throughout the submitted EIAR as part of the proposed project and all associated effects have also been assessed. For the offsite stone/material (including concrete) the EIAR has assessed a number of potential nearby quarry sources which have access to the national road network, with the proposed material haul route from the national road network to the proposed wind farm site shown in Figure 2-4 of the submitted EIAR. The works along the grid connection route will be transient in nature and only small numbers of truck movements will be required along this route, with works only lasting a short

period in any one location. All such movements have been considered fully in the EIAR, particularly in Chapter 16 (Traffic and Transportation).

2.2.5 Inadequate Assessment of the GCR

One observation suggests that the EIAR does not contain sufficient information on the proposed GCR works, and that the assessment of the route was inadequate. The Applicant notes that the proposed GCR works are described both in Chapter 2 (Description of the Proposed Project) of the EIAR and in more detail in the Grid Connection Construction Methodology (Appendix 2-5), which provides a comprehensive overview of the proposed GCR works. The Applicant also notes that the GCR has been subject to specific, site-based field surveys and desk studies as required across all relevant environmental disciplines and each technical chapter of the EIAR has explicitly evaluated the grid connection as part of its assessment.

2.2.6 Lack of public engagement and transparency

It was suggested in two observations that the applicant did not engage with the public or make information available relating to the proposed development. It was also stated that this "*runs contrary to the principles of transparency and fair public consultation under the Aarhus Convention*". On the contrary, the consultation process for the proposed development was carried out as part of the wider proposed project and was designed to exceed statutory requirements, ensuring alignment with the principles of transparency and early participation advocated by the Aarhus Convention.

The Applicant implemented a robust, multi-stage engagement strategy beginning in Autumn 2022, long before the submission of the planning applications. Key elements of this transparent approach include:

- Proactive Information Distribution: Three separate newsletters were distributed to residents within a 4km zone (Autumn 2022, Winter 2022/Spring 2023, and Summer 2023), providing progress updates, draft layouts, and environmental study details.
- Direct Community Access: Two dedicated Community Liaison Officers (CLOs) were appointed and remain available to discuss the project directly with stakeholders.
- In-Person Engagement: Multiple public events were held to facilitate face-to-face dialogue, including an Information Hub at Cappoquin Community Hall (November 2023) and dedicated Community Engagement Clinics at The Park Hotel, Dungarvan (November 2023).
- Digital Accessibility: Comprehensive project information has been maintained on two dedicated websites (scartmountainwindfarm.ie and scartmountaingridplanning.ie). This includes a Virtual Exhibition containing study reports, photomontages, and a final layout map, ensuring that those unable to attend in-person events could access the same high-quality information.
- Webinars and Virtual Tools: A Community Information webinar was held in Summer 2023 to further broaden the reach of the consultation.

The applicant maintains that the provision of technical data through the EIAR, combined with years of iterative community outreach, provided ample opportunity for the public to be

informed and to influence the development process. The information provided was clear, scientifically grounded, and made available in multiple formats to ensure maximum accessibility.

2.2.7 Consultant Impartiality

There was one comment suggesting that TOBIN were not impartial in preparing the EIAR documents submitted with the planning application. It is important to clarify that an EIAR and the related documents is not a promotional document, but a professional technical statement prepared in accordance with the EIA Directive (2014/52/EU) and the Planning and Development Act 2000 (as amended) and the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018. The impartiality and robustness of the assessments are underpinned by:

- **Statutory Obligation:** Under the EIA Directive, the applicant is required to ensure that the EIAR is prepared by competent experts. TOBIN is a long-standing multi-disciplinary firm and many of their staff and staff of their team of sub-consultants are members of professional bodies such as Engineers Ireland, the Institution of Environmental Science (IES), the Institute of Geologists of Ireland (IGI), and the Chartered Institute of Ecology and Environmental Management (CIEEM). These memberships require adherence to strict codes of professional conduct and ethics.
- **Scientific Objectivity:** The findings within the EIAR are based on objective scientific data, including onsite surveys and computer modelling. The data and methodologies are transparently presented in the technical chapters and appendices, allowing the competent authority and the public to independently verify the conclusions reached.
- **Competent Authority Oversight:** The EIAR is a tool for the Planning Authority (An Coimisiún Pleanála). The Commission's own inspectors and internal specialists undertake the EIA with the EIAR being one of many inputs to the Commission's EIA.

The applicant maintains that the assessment has been carried out with professional integrity and provides a complete and unbiased evidence base to allow for a fully informed planning decision.

2.2.8 Forestry

2.2.8.1 Environmental and Recreational values

It was raised by a number of observations that the proposed development would have a significant impact on the forestry/woodlands along the route, and the associated environmental and recreational values. The Applicant acknowledges the importance of Colligan Wood as both a biodiverse habitat and a significant recreational resource. However, the potential for the proposed development to heavily impact these areas is mitigated by the specific routing and construction methodology proposed. Some important considerations in this regard are:

- The grid connection through Colligan Wood is restricted entirely to the existing forest road/track corridor. By confining all trenching and cabling to the disturbed footprint of the current road, the project minimises the direct loss of woodland habitat, tree felling, and fragmentation of the forest canopy.
- As detailed in Chapter 6 of the submitted EIAR (Biodiversity), the ecological value of the woodland margins has been assessed. The construction phase will be subject to strict

pollution prevention measures to ensure that runoff from the GCR works does not enter the Colligan River or sensitive woodland soils. An Environmental Clerk of Works (ECoW) will oversee the works to ensure nesting birds or sensitive flora are protected during the appropriate seasons.

- The Applicant recognises the value of the Colligan Wood for walking and recreation. While temporary closures or traffic management may be required for safety during the construction phase (which is expected to last only a few weeks in this specific section), these are temporary impacts. Full public access will be restored immediately following the completion of works.
- The Applicant will coordinate with Coillte to ensure that grid construction does not impede essential forestry access paths/tracks. The timing of works will be managed so as not to conflict with any planned forest management activities.
- Following the completion of the construction phase of the proposed project, the grid connection will be entirely underground and silent, with no permanent impact on the visual or recreational amenity of Colligan Wood.

2.2.8.2 Forestry Removal and Climate

One observation received raised concerns regarding the forest removal associated with the proposed project and its effect on climate. While it related to the wider project which includes the proposed GCR as well as the separately proposed wind farm, the text below provides a response, with some specific details relating to the GCR where appropriate.

Chapter 14 Air Quality and Climate of the EIAR assesses the impact on climate of the potential greenhouse gas (GHG) emissions during the construction and operational phases of the development, as well as the offsetting of GHG emissions through renewable electricity generation, which will contribute to reducing Ireland's reliance on fossil fuels. The assessment takes into account the grid connection, which is required to deliver this renewable energy to the national grid and is therefore considered essential enabling infrastructure for renewable energy production.

The methodology for quantification of GHG emissions associated with the proposed project is detailed in Sections 14.2.3.3 – 14.2.3.6 and Section 14.2.4.2 of Chapter 14 Air Quality and Climate and describes the sources of GHG emissions during the construction and operational phases of the proposed development. The primary sources of GHG emissions associated with the proposed project (and indeed the proposed GCR) include:

- Materials required during the full construction period (such as concrete) and their associated transport, as well as construction staff transport. Details of vehicle movements are provided in Chapter 16 Traffic and Transportation and are incorporated into the GHG assessment as part of Chapter 14 Air Quality and Climate.
- Changes to the forestry area as part of site clearance and excavation works during construction. The total area of forest and the methods by which it will be affected are described in Chapter 3 (Description of the Proposed Development) and are incorporated into the GHG assessment as part of Chapter 14 (Air Quality and Climate).

The 85.5 – 108 MW capacity wind turbines associated with the wider proposed project will contribute to the Climate Action Plan 2025 (CAP25) key targets of producing 80% of energy from renewable sources by 2030. CAP25 is a statutory road map of actions necessary for Ireland

to comply with legally binding economy-wide carbon budgets and sectoral GHG emissions ceilings. Without the actions identified by CAP25 (and future CAPs), Ireland will not meet its national climate objective of "*pursuing and achieving, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy*". Decarbonising energy production will not be achieved by a single form of renewable energy production, and will require a variety of technologies, including wind turbines and associated grid infrastructure. Meeting the 80% renewable energy production target will require at least 9 GW of onshore wind capacity, 8 GW of solar capacity, 5 GW of offshore wind capacity and 2 GW of new flexible gas plant. Onshore wind energy production and its associated grid infrastructure is a large component of meeting the 80% renewable energy target, and the proposed development is therefore fully aligned with national climate policy.

The proposed project will also offset GHG emissions (both its own and total national emissions) during its operation. This offset is primarily due to the renewable electricity generated by the wind turbines over the 35year lifespan of the proposed project.

The GHG emissions offset from the operation of the wind turbines, construction phase emissions associated with the project (turbines and grid connection), as well as the change in forestry area and condition relative to the Do Nothing, and the alignment of the proposed development with Ireland's trajectory to net zero by 2050 and CAP25 are taken into account in determining the significance of effect of the proposed development on climate.

The forestry area removed due to the proposed project includes primarily conifer plantation which is Coillte land for commercial forestry (between 91.6 ha and 99.7 ha), and the majority of this removal occurs at the wind farm site. The area of forestry removed due to the grid connection is approx. 0.04 ha and has been accounted for in the total forestry area removal assessed. Replanting of an area of forestry equivalent to that removed as part of the proposed project (1 ha onsite, the remaining approx. 98.7 ha offsite, see Sections 14.2.3.4, 14.4.2.2 and 14.4.3.2 of Chapter 14 Air Quality and Climate) will be conducted to prevent a net loss of forestry.

The annual GHG operational emissions offset (which has taken the construction phase emissions into account) from the proposed project is equivalent to between 2.6% and 3.3% of the total carbon budget for the electricity sector in 2030 i.e. the proposed project has the potential to reduce Ireland's GHG emissions in this sector by this percentage.

The proposed development is therefore predicted to have a direct, long term, positive and slight effect on climate, which is overall not significant in EIA terms.

The recent High Court judgment from *Rural Residents Wind Aware and Environmental Group & Ors v An Coimisiún Pleanála (2025)* establishes that the greenhouse gas emissions avoided by renewable energy projects are a material planning consideration. The Court held that the Board is entitled to give significant weight to a project's net climate benefit in the context of Ireland's legally binding targets under the Climate Action and Low Carbon Development (Amendment) Act 2021. This precedent confirms that the imperative to decarbonise the electricity grid is a significant material consideration in planning decisions, to be carefully weighed alongside site-specific environmental effects, all of which are subject to detailed assessment, avoidance and mitigation through the EIA process.

The above text provides a clear response to the third party comments and issues raised in the application observations related to the proposed GCR and Air Quality and Climate. The authors remain satisfied that the submitted EIAR contains a robust assessment of the proposed project following review of these third party observations.

2.2.9 Repetition of material from the wind farm application

There was one observation regarding the overlap in information between the current grid connection application and the associated Scart Mountain Wind Farm application and the volume of associated documents. The Applicant confirms that the same comprehensive EIAR has been submitted for both the Scart Mountain Wind Farm and the currently proposed GCR. This approach is a deliberate and necessary measure to comply with the principles established by the Irish High Court in O'Grianna vs An Bord Pleanála (2014). The use of a single, unified document ensures that the Applicant avoids the prohibited practice of splitting a project into smaller parts to mask its total environmental footprint. It also allows the Competent Authority to evaluate the 'total effect' of the proposed project on sensitive receptors without the risk of conflicting data between two separate reports. Although the document is the same, it contains dedicated information and assessments for the proposed GCR.

2.2.10 Cumulative assessment - General

An observation raised concern that the cumulative impact assessment within the submitted EIAR was not of a suitable standard. The Applicant strongly contests the assertion that the cumulative impacts of other wind farms and any other developments were not considered. A dedicated cumulative impact assessment, in line with the latest EIAR guidelines is integrated into each technical chapter of the submitted EIAR.

It should be noted that two important projects considered in the EIAR cumulative impact assessments Dyrick Hill Wind Farm (ACP Case Ref. PA93.317265) and Coumnagappul Wind Farm (ACP Case Ref. PA93.318446) have since been refused permission and will not (as it stands) proceed. Regardless of this, no unacceptable cumulative effects were found to arise when these were considered.

The Applicant is satisfied that the submitted EIAR provides a comprehensive evaluation of all significant cumulative effects, demonstrating that the proposed development will not result in an unacceptable environmental impact when viewed in the context of the wider regional development.

2.2.11 Cumulative Assessment of the GCR

One observation suggests that the proposed GCR itself should be subject to a cumulative assessment alongside the separately proposed wind farm. However, it is a fundamental principle of EIA that a project should not be 'split' to avoid full scrutiny. In this instance, the submitted EIAR has adopted a robust and comprehensive approach by treating all elements of the proposed project (i.e. including the proposed wind farm, GCR and all other ancillary works) as a single, integrated project for the purposes of environmental assessment. As a result, their interactions and combined environmental footprint have been captured directly within the

primary assessment. To treat the grid connection as a separate entity for cumulative assessment against the wind farm would be incorrect as the impacts are already fully accounted for.

2.2.12 Community Disruption

One observation raises concerns regarding potential impacts that the proposed grid connection route may have on the community as it runs through Modeligo. The works associated with the grid connection route will be transient in nature and will only occur at any one place for a matter of days or at most weeks. This would be similar to other works for underground services such as water or power lines. Once constructed, there would be no impact to the community, with no noise, traffic, or other considerations associated with the operational cable, and there will be no disturbance to the local residents. These cables are installed in roads around Ireland without affecting local communities negatively.

2.2.13 Mitigation clarity

One observation claims that the mitigation prescribed in the EIAR is unclear and defers the responsibility to the contractors during construction. The Applicant rejects the assertion that mitigation measures are non-specific or deferred. The EIAR identifies clear, evidence-based mitigation measures for every potential significant impact identified during the assessment. While the final selection of specific construction equipment or the precise sequencing of works is a matter for the appointed contractor, the environmental performance standards and mitigation outcomes are fixed and non-negotiable. A comprehensive CEMP has been submitted as part of the application. This document is not a deferral, but a binding framework that sets out the mandatory environmental considerations for the project. The mitigation measures explicitly require the appointment of an Environmental Clerk of Works (ECoW) and a Project Archaeologist, whose roles are to ensure that the contractor implements the measures exactly as described in the EIAR and in accordance with any planning conditions.

Should permission be granted, these mitigation measures typically become a formal condition of the planning consent, and the contractor will be contractually obliged to adhere to them. Any deviation by a contractor may constitute a breach of planning conditions (and planning law), providing a robust mechanism for enforcement by Waterford City and County Council. Furthermore, significant mitigation has already been designed into the project, such as the use of HDD for major watercourse crossings.

2.2.14 Traffic Counts Or Surveys

Six observations raised concerns about traffic surveys on the affected road network. Observers stated that no traffic counts or surveys were undertaken on affected roads, including the R671, R672 and N72, and that the absence of such data undermines the assessment of potential traffic impacts associated with the proposed GCR.

Traffic survey data were collected as part of the Traffic and Transportation Assessment.

A classified Junction Turning Count (JTC) survey was undertaken by Nationwide Data Collection on Wednesday 24 May 2023 between 07:00 and 19:00 at the existing N72/L1027 crossroads. Details of this survey are provided in EIAR Chapter 16 (Traffic & Transport), Section 16.2.4.1.

The location of this survey was scoped in consultation with Waterford City and County Council, as it was identified as the junction most likely to experience the highest percentage increase in traffic during the construction phase.

Traffic counts were not undertaken on other sections of the route as the anticipated increase in traffic associated with the proposed GCR is not expected to exceed the 10% threshold identified in the Transport Infrastructure Ireland Traffic and Transport Assessment Guidelines (PE-PDV-02045, May 2014) for requiring detailed analysis. The proposed development will generate limited additional trips, with traffic impacts primarily arising from temporary traffic management requirements associated with trenching works rather than sustained increases in traffic volumes.

Accordingly, it was considered that additional traffic surveys at the R671, R672, and other sections of the N72 affected by the proposed GCR would not materially inform the assessment of traffic impacts, given the limited and temporary level of additional traffic predicted during the construction phase. On this basis, further survey work at these locations was not deemed necessary for the purposes of assessing the development's traffic effects.

It was determined that the traffic impacts associated with the proposed GCR are primarily related to traffic management requirements arising from trenching works within the public road, rather than from increases in traffic volumes. Accordingly, the assessment of effects focuses on the safe management of traffic during construction activities.

A detailed Traffic Management Plan will be prepared prior to commencement of works and agreed with Waterford City and County Council. This plan will set out the measures to be implemented to maintain traffic flow, ensure road safety, and minimise disruption to residents, businesses, and road users during the construction phase.

Overall, the assessment concludes that the proposed GCR will give rise to temporary and localised traffic disruption associated with traffic management measures during construction but will not result in significant long-term increases in traffic on the surrounding road network once works are complete. Disruptions will be localised throughout the approximately nine months construction period for the proposed development.

2.2.15 Unsuitability of Local Roads (Narrow Geometry, Blind Bends, Steep Gradients)

Twelve observations raised concerns about the suitability of the road network to cater to the projected traffic. Observers stated that many roads along the proposed GCR are narrow rural roads with constrained geometry, including single-lane sections, steep gradients, blind bends, and limited or no hard shoulders. It was argued that these roads were not designed for heavy construction traffic and that their use could increase collision risk for motorists, cyclists, pedestrians, agricultural vehicles, and local residents.

Specific concerns were raised regarding the suitability of certain local roads and the potential difficulty for vehicles to pass safely.

Construction activities associated with underground cable installation will be temporary and progressive in nature, with trenching works advancing along the route rather than occurring simultaneously over long distances. Typically, no more than approximately 100 metres of trench

will be open at any one time, thereby limiting the extent of road space affected at a given location and ensuring that disruption is short-term and continuously moving along the route. The excavation, installation and reinstatement process is expected to take, on average, approximately two days to complete a 100-metre section.

Traffic management measures will be implemented to ensure safe operation along constrained sections of road. These measures will be detailed in a Construction Traffic Management Plan to be prepared prior to commencement of works and agreed with Waterford City and County Council. This TMP will be informed by, and developed from, the outline TMP submitted as Appendix 2-4 of the submitted EIAR. Traffic management and signage will be implemented in accordance with the *Department of Transport Traffic Signs Manual -(Chapter 8).* Mitigation measures are provided in Section 16.4.and the CEMP (Chapter 16 and Appendix 2-8 respectively) of the submitted EIAR and include the implementation of the TMP. Of note specifically for the GCR:

- The contractor will consult and comply with the Roads Authority, An Garda Síochána and other Emergency services to agree a suitable diversion route prior to implementing any Road Closure;
- Works will also be reinstated as soon as practicable in accordance with the "Purple Book";
- The proposed reinstatement and construction details and phasing will be agreed with associated Local Authorities in advance of the works;
- The Contractor will be responsible for arranging for the required road opening licences

The Applicant will engage with local residents, landowners, and stakeholders in advance of works commencing to provide information on the construction programme, traffic arrangements, and anticipated durations for works in specific areas. Advance notification will be provided where works may affect access or traffic conditions.

Construction vehicles will operate in accordance with applicable road safety standards, and drivers will be briefed on route conditions.

Overall, while temporary disruption to traffic is unavoidable during trenching works, the limited extent of works at any one time, the short duration required to complete each section (the works will only excavate the length of road that they can complete (backfill) in that day – typically 150m per day), together with appropriate traffic management measures and ongoing engagement with affected communities, will ensure that the works can be carried out safely without significant long-term adverse effects on the road network.

2.2.16 Risk of Road Closures, Detours and Network Disruption

Eight observations raised concerns about the risk of road closure, detour and network disruption. Observers expressed concern that trenching works associated with the proposed GCR could result in temporary road closures on rural routes where alternative access options are limited. It was suggested that closures could lead to significant detours, increased travel times (including estimates of 15–30 minutes), disruption to local businesses and farming activities, and inconvenience for residents.

Specific concerns were raised regarding potential closures of strategically important routes, including the R672, and the adequacy of diversion arrangements given the constrained nature of the surrounding road network.

The Applicant acknowledges that construction of the GCR will require temporary traffic management measures along sections of the public road network. However, full road closures will not be the default construction approach and will only be implemented where necessary for safety reasons and where alternative traffic management arrangements cannot be safely accommodated.

Where road widths allow, works will be undertaken using temporary traffic control measures such as stop/go systems or temporary signals, maintaining a minimum running lane for traffic at all times. This approach allows traffic to continue to pass through the works area safely while installation progresses.

Construction activities will be temporary and progressive in nature, with trenching works advancing along the route rather than occurring simultaneously over extended sections. Typically, no more than approximately 100 metres of trench will be open at any one time, and the excavation, installation and reinstatement process for each 100-metre section is expected to take, on average, approximately two days. This approach limits the duration and spatial extent of any disruption at a given location.

Where full road closures are unavoidable, these will be of short duration (i.e. in the order of days or weeks for any section of road, with the works area (where restrictions are greatest) typically only covering approximately 150m on any given day) and implemented in consultation with Waterford City and County Council. Appropriate diversion routes will be identified and agreed with the Council in advance, taking account of local road conditions, traffic volumes, and the needs of residents, businesses, agricultural activities, and public services.

Traffic management and road signage will be implemented in accordance with the Department of Transport Traffic Signs Manual — Chapter 8: Temporary Traffic Measures and Signs for Roadworks. All works affecting public roads will be subject to the approval of a road opening licence issued by Waterford City and County Council, which will include conditions relating to traffic management, public safety, and maintenance of access.

The Applicant will engage with local residents, landowners, and stakeholders prior to works commencing to provide advance notice of any planned traffic restrictions, including closures or diversions where required. Access for residents, farms, and businesses will be maintained wherever practicable, and arrangements will be made to facilitate essential movements.

Overall, while temporary disruption to traffic is unavoidable during trenching works, the limited extent of works at any one time, the short duration required to complete each section, and the implementation of appropriate traffic management measures will ensure that impacts on the road network are localised and temporary. The proposed GCR will not result in permanent road closures or long-term changes to network connectivity once construction is complete.

2.2.17 School Transport and Child Safety

Five observations raised concerns in relation to the safety of school-age children. Observers expressed concern that sections of the proposed GCR coincide with school bus routes and areas

where children wait roadside for collection and drop-off. Particular concern was raised regarding the proximity of the route to Modeligo National School on the R671.

Submissions noted that many rural school transport users wait at roadside locations without formal bus stops and that trenching works, traffic management measures, or potential road closures could pose safety risks to children. Concerns were also expressed that construction hours may coincide with school start and finish times and that no specific mitigation measures were outlined.

The Applicant acknowledges the importance of ensuring the safety of schoolchildren and other vulnerable road users during construction of the proposed GCR.

Construction works will be temporary and progressive in nature, with trenching activities advancing along the route rather than occurring simultaneously across large areas. Typically, no more than approximately 100 metres of trench will be open at any one time, and the excavation, installation and reinstatement process for each section is expected to take, on average, approximately two days. This approach limits the duration of works in the vicinity of any particular location, including areas used for school transport.

A detailed Construction Traffic Management Plan will be prepared prior to commencement of works and agreed with Waterford City and County Council. This TMP will be informed by, and developed from, the initial TMP submitted as Appendix 2-4 of the submitted EIAR. This plan will include specific measures to protect vulnerable road users, including schoolchildren, pedestrians, and cyclists.

Traffic management and road signage will be implemented in accordance with the Department of Transport Traffic Signs Manual — Chapter 8: Temporary Traffic Measures and Signs for Roadworks.

Where works are located near schools or on school bus routes, additional mitigation measures will include:

- Liaison with school authorities and school transport providers
- Avoidance of critical school start and finish times where practicable
- Temporary traffic control measures during peak school periods
- Traffic marshals at key locations if required
- Safe pedestrian routes around works areas
- Maintenance of access for school transport vehicles
- Advance notification to parents and residents

School bus access will be maintained wherever practicable. Where temporary restrictions are necessary, arrangements will be coordinated with relevant authorities and service providers to ensure that pupils can continue to travel safely to and from school.

The Applicant will also engage with local residents and stakeholders in advance of works commencing to provide information on timing and traffic arrangements in affected areas.

Overall, while temporary disruption may occur where works intersect with school transport routes, the limited duration of works at any location, together with appropriate traffic management measures and targeted mitigation, will ensure that risks to schoolchildren and other vulnerable road users are minimised and managed safely.

2.2.18 Emergency Services Access

Five observers expressed concern that construction works associated with the proposed GCR could impede access for emergency services, including ambulances, fire services, and An Garda Síochána. It was suggested that temporary road closures, traffic management measures, or the presence of construction vehicles on narrow rural roads could delay response times and restrict access to homes, farms, and businesses.

Submissions emphasised the limited availability of alternative routes in rural areas and the potential risk to public safety should emergency vehicles be unable to pass through affected sections of the road network.

The Applicant confirms that works associated with the underground cable installation will be temporary and progressive in nature, with trenching advancing along the route rather than occurring simultaneously over extended sections

A detailed Construction Traffic Management Plan will be prepared prior to commencement of works and agreed with Waterford City and County Council. This plan will include provisions to ensure that emergency access is maintained throughout the construction period.

Traffic management and road signage will be implemented in accordance with the Department of Transport Traffic Signs Manual — Chapter 8: Temporary Traffic Measures and Signs for Roadworks.

- Specific measures to facilitate emergency services include:
  - Maintaining a traffic lane through the works area wherever practicable
  - Use of stop/go systems or temporary signals to allow rapid clearance for emergency vehicles
  - Provision for immediate suspension of works to allow passage
  - Coordination with emergency service providers where required
  - Ensuring construction personnel are trained to respond appropriately to emergency situations
  - Keeping the works area clear of unnecessary obstructions
  - Availability of temporary measures (such as steel plates) to allow vehicle crossing of excavations in urgent circumstances.

Construction vehicles will be parked within designated works areas so as not to impede traffic flow beyond the immediate construction zone.

Where full road closures are unavoidable for safety reasons, arrangements will be made in consultation with Waterford City and County Council to ensure that alternative access routes are available and that emergency services are informed in advance.

Overall, the temporary and localised nature of the works, together with appropriate traffic management measures and coordination with relevant authorities, will ensure that emergency access can be maintained and that risks to public safety are minimised.

2.2.19 Construction Traffic and Heavy Vehicle Safety

Seven observers expressed concern regarding the use of construction vehicles and heavy goods vehicles (HGVs) on narrow rural roads along the proposed GCR. It was argued that many roads

are below typical design standards, contain blind bends and steep gradients, and have limited opportunities for passing, thereby increasing the risk of collisions and safety hazards for motorists, cyclists, pedestrians, and agricultural traffic.

Specific concerns were also raised regarding delivery traffic associated with construction materials, including references to haulage from distant quarries, the adequacy of passing opportunities on local roads, and the potential for increased danger at locations with constrained geometry.

The applicant notes that underground cable installation is not a haulage-intensive activity, and only limited numbers of heavy goods vehicles are expected during construction. Traffic associated with the works will primarily consist of light and medium-sized construction vehicles, crew transport, and occasional deliveries of materials and equipment. In addition, as construction activities will be concentrated within short sections of the route at any one time (typically no more than approximately 100 metres), the intensity of HGV movements at any given location will be limited. As a result, the volume of heavy vehicle traffic on the road network will be low compared to many other forms of construction development.

A detailed Construction Traffic Management Plan will be prepared prior to commencement of works and agreed with Waterford City and County Council. This plan will set out the measures to ensure the safe movement of construction vehicles and the protection of all road users. This TMP will be informed by, and developed from, the initial TMP submitted as Appendix 2-4 of the submitted EIAR.

Traffic management and road signage will be implemented in accordance with the Department of Transport Traffic Signs Manual (Chapter 8).

- Mitigation measures are provided in Section 16.4.and the CEMP (Chapter 16 and Appendix 2-8 respectively) of the submitted EIAR.

Construction vehicles will be managed so as not to create unnecessary obstruction beyond the immediate works area.

Overall, while temporary construction traffic will be generated, the limited intensity of activity at any one location, together with appropriate traffic management measures, will ensure that works can be carried out safely on the existing road network without significant adverse effects.

2.2.20 Adequacy and Enforceability of the Traffic Management Plan

Six observers expressed concern that the Traffic Management Plan (TMP) has not been provided in detail at the application stage and that key measures are deferred to the construction phase or to the appointed contractor. It was suggested that this approach renders the proposed mitigation uncertain or unenforceable at the time of decision-making.

Submissions also noted the absence of detailed information on temporary speed limits, diversion arrangements, machinery parking, and site-specific mitigation measures, and argued that this creates uncertainty regarding the safety and practicality of construction works on the local road network.

The applicant confirms that a Traffic Management Plan has been prepared and submitted as part of the application documentation (EIAR Appendix 2-4). This document outlines the proposed

approach to managing traffic during construction of the GCR, including the types of measures that will be implemented to ensure safety and minimise disruption.

Prior to the commencement of works, a more detailed Construction Traffic Management Plan will be prepared in consultation with and agreed by Waterford City and County Council. This detailed plan will reflect the final construction methodology, sequencing, contractor arrangements, and site-specific conditions at the time of implementation.

All works affecting public roads will be subject to the approval of a road opening licence issued by Waterford City and County Council, which will include conditions relating to traffic management, public safety, maintenance of access, and reinstatement requirements.

The detailed Construction Traffic Management Plan will address, as appropriate:

- Traffic control measures (e.g. stop/go systems, temporary signals)
- Temporary speed restrictions where required
- Diversion arrangements where necessary
- Safe access for residents, farms, and businesses
- Provision for emergency services
- Measures to protect vulnerable road users
- Parking and operation of construction vehicles and machinery
- Communication with local stakeholders

The requirement for Council approval of both the Construction Traffic Management Plan and the road opening licence provides an enforceable mechanism to ensure that works are carried out safely and in accordance with statutory requirements.

Overall, the approach to traffic management is clearly established through the submitted documentation, adherence to national guidance, statutory licensing procedures, and oversight by Waterford City and County Council. The preparation of a detailed implementation-stage plan prior to construction is standard practice for projects of this nature.

2.2.21 Cumulative Traffic Impacts with Other Developments

Eight observers expressed concern that cumulative traffic impacts arising from other existing, permitted, or proposed wind energy developments and grid connections in the wider area have not been adequately assessed. Particular reference was made to potential overlapping construction periods associated with projects such as Dyrick Hill Wind Farm, and Coumnagappul Wind Farm, and the potential for simultaneous works affecting sections of the N72, R671, R672, and local roads. Submissions suggested that concurrent construction activities could result in increased traffic volumes, road closures, detours, and prolonged disruption to the local road network over multiple years.

The EIAR includes a cumulative assessment of potential impacts arising from other approved and proposed developments in the area. In particular, EIAR Chapter 16, Section 16.6 considers interactions with other developments and infrastructure projects, including potential cumulative traffic and infrastructure effects.

The detailed design, routing, and installation of the grid connection will be subject to agreement with Waterford City and County Council and Transport Infrastructure Ireland, as appropriate.

This process will ensure that any constraints relating to separation distances, road integrity, safety, maintenance, and operational requirements are properly addressed.

Should permission be granted, coordination with the relevant road authorities and stakeholders will be undertaken to ensure that installation of the proposed infrastructure does not adversely affect the strategic function, safety, or maintenance of the national road network.

The applicant notes that the Dyrick Hill Wind Farm and the Coumnagappul Wind Farm have since been refused planning permission and therefore no longer represent committed or reasonably foreseeable future developments. Accordingly, these projects do not give rise to cumulative infrastructure or traffic constraints along the N72.

2.2.22 Road Condition, Structural Suitability and Reinstatement

Ten observers expressed concern that sections of the local and regional road network are narrow, rural in character, and not designed to accommodate construction traffic or heavy vehicles. It was suggested that the use of these roads during construction could result in deterioration of road surfaces, structural damage, or long-term impacts on road condition.

Submissions also noted the absence of detailed road condition surveys and questioned whether reinstatement measures would adequately restore affected roads following installation of the GCR. Concerns were raised that any damage could adversely affect residents, agricultural activities, and road safety.

The applicant confirms that prior to the commencement of works, pre-construction road condition surveys will be undertaken where required, in consultation with Waterford City and County Council. These surveys will document the existing condition of affected road sections and establish a baseline against which any post-construction condition can be assessed.

All works within the public road will be carried out under a road opening licence issued by Waterford City and County Council. This licence will specify requirements relating to construction methods, protection of road infrastructure, traffic management, and reinstatement standards.

Reinstatement of the carriageway will be undertaken in accordance with the requirements of the road authority and relevant national standards. The road will be restored to at least its pre-construction condition, or better where required, at the Applicant's expense. Any damage attributable to construction activities will be rectified as part of the reinstatement process.

Underground cable installation is not a haulage-intensive activity, and only limited numbers of heavy goods vehicles are expected during construction. Traffic associated with the works will primarily consist of light and medium-sized construction vehicles, crew transport, and occasional deliveries of materials and equipment. In addition, as works will be concentrated within short sections of the route at any one time, the intensity of construction traffic at any given location will be limited.

Given the temporary and localised nature of the works, together with the statutory controls imposed through the road opening licence process, significant long-term deterioration of the road network is not anticipated.

Overall, while temporary impacts on road condition may occur during construction, these will be short-term and localised, and the road network will be fully reinstated following completion of the works.

2.2.23 Coal Tar Macadam and Potential Hazardous Road Materials

Three observers indicated that sections of the local road network may contain coal tar macadam and expressed concern that excavation works could release hazardous substances, cause environmental contamination through runoff, or delay construction. It was suggested that disturbance of such materials could pose risks to human health and the environment, including nearby watercourses.

The applicant confirms that where such materials are encountered during excavation, they will be managed in accordance with relevant health, safety, environmental, and waste management legislation.

Prior to and during construction, appropriate procedures will be implemented to identify and safely handle any hazardous road materials. Excavated materials will be assessed and classified where necessary, and any materials identified as hazardous will be handled, stored, transported, and disposed of by suitably licensed contractors in accordance with applicable regulatory requirements.

Measures will be implemented to prevent the release of contaminants to surrounding land, drainage systems, or watercourses, including appropriate containment and site management practices. Where required, materials will be removed to appropriately authorised facilities.

All works affecting the public road will be carried out under a road opening licence issued by Waterford City and County Council, which will include conditions relating to environmental protection and reinstatement of the road surface.

The management of coal tar macadam and similar legacy road materials is a well-established aspect of roadworks and utility installations and does not present an unusual constraint to underground cable construction. With the implementation of standard construction management procedures and regulatory controls, significant environmental or public health impacts are not anticipated.

2.2.24 Access to Properties, Farms and Local Businesses

Six observers expressed concern that construction works associated with the proposed GCR could restrict access to residences, farms, and local businesses along rural roads. It was suggested that temporary traffic management measures, excavation works, or potential road closures could disrupt daily activities, agricultural operations, deliveries, and essential services.

Submissions emphasised the reliance of rural communities on the local road network and the limited availability of alternative access routes in some areas.

The applicant confirms that maintaining access to properties, farms, and businesses will be a key requirement during construction of the proposed GCR.

Construction works will be temporary and progressive in nature, with trenching activities advancing along the route rather than occurring simultaneously across large areas.

Where temporary restrictions are necessary, arrangements will be implemented to maintain access wherever practicable, including controlled access through the works area where it is safe to do so. Access for residents, agricultural vehicles, and service providers will be facilitated in coordination with affected parties.

Advance notification will be provided to property owners, landowners, and occupiers in areas where works are scheduled, allowing reasonable time for planning and coordination. Emergency access will be maintained at all times.

Overall, while temporary inconvenience may occur during construction, the short duration of works at any location and the progressive nature of installation mean that impacts on access will be localised and temporary.

2.2.25 Archaeology features: Modeligo Church and Graveyard (RMP WA022-026001/2) & Ringfort (WA022-011)

Two submissions note that the proposed Grid Connection Route passes adjacent to Modeligo Church and Graveyard (RMP WA022-026001/2) & Ringfort (WA022-011) [and as such there is a risk of irreversible damage to archaeological deposits; a loss of historic setting and character and damage to businesses that rely on heritage tourism. Chapter 15 (Archaeology and Cultural Heritage) identifies these monuments as AH 1, 2 and 3 and clearly states that they are in the study area of the proposed Grid Connection Route (Table 15.2 of the submitted EIAR). The proposed Grid Connection Route does not travel through any of these sites but is immediately adjacent to them. As a result, the sites have been included in the impact assessment (section 15.5.2 of the EIAR) and the potential for direct negative impacts prior to the application of mitigation has been acknowledged. As detailed in section 15.6.1 of the submitted EIAR, full mitigation measures are given with regards to the fact that all ground works at these locations will be subject to archaeological monitoring, under licence to the National Monuments Service of the DoHLGH. This will ensure that if any archaeological remains are present, they will be identified and either preserved in-situ or by record. The Applicant notes that the trench containing the Grid Connection Route will be reinstated as roadway, and as such, there will be no loss of historic character or setting.

2.2.26 Veracity of Heritage Assessment

One observation notes that the EIAR heritage assessment is superficial and does not meet best practice standards. The observation does not provide any further information as to how Chapter 15 (Archaeology and Cultural Heritage) might be deficient. This assertion is contested, especially in light of the fact that the National Monuments Service of the DoHLGH have not identified any deficiencies associated with the content of Chapter 15. The EIAR chapter was written by a qualified and competent expert (Faith Bailey (MA, BA (Hons), MIAI, MCIfA) in accordance with the EIA Directive (2014/52/EU) and the EPA Guidelines (2022), ensuring that the identification, description, and assessment of potential impacts on the archaeological and cultural landscape are robust.

The above text provides a clear response to the third party comments and issues raised in the application observations related to the proposed GCR and Chapter 15 Archaeology and

Cultural Heritage. The author remains satisfied that the submitted EIAR contains a robust assessment of the proposed project following review of these third party observations.

2.2.27 Habitats - Woodland and Hedgerows

Four observations raised concerns relating to the impacts that the proposed development will have on the woodland and hedgerow habitat that is located along the proposed GCR route.

One observation raised concerns about Farnane Wood. No works will occur within Farnane Wood which is located over 850m from the proposed GCR at the nearest point. Concerns were raised that water quality pollution would impact on this ancient native temperate rainforest. Strict mitigation measures will be in place as prescribed in Section 2.1.4.2 and the submitted Surface Water Management Plan (SWMP) which will prevent impacts to water bodies and associated habitats such as Farnane Wood. The implementation of these measures and the monitoring of the effectiveness of these measures will be carried out by an appointed suitably qualified Ecological Clerk of Work (ECoW) as described in Section 6.9.2 of Chapter 6 (Biodiversity) of the submitted EIAR and the CEMP (Appendix 2-8).

One observation raised concerns about the GCR traversing through Inchadrisla Wood after it has crossed the Colligan River and stated that no surveys had taken place at this location. Although it is correct that this exact location is not mentioned in the habitat description it is mentioned in the assessment section as 'habitat to the north of the Colligan River' (see Section 6.7.3.1.5 of the submitted EIAR). , The surveys that were carried out at this location (see Figure 6-3G Habitats of Chapter 6 (Biodiversity) of the submitted EIAR) resulted in determining the shortest path (approximately 50m) to the forestry track which the GCR will continue to follow until it passes on to the Inchadrisla Wood Road without further impacting any woodland habitat. The route through Inchadrisla Wood will comprise a section of 50m and mainly comprises non-native immature conifers and native scrub.

Two observations concerned the impacts on hedgerows. Small areas of hedgerow and scrub were recorded along the proposed access and GCR. There will be an estimated loss of 0.04ha. Mitigation measures are proposed in Section 6.8.1.3.6 Chapter 6 (Biodiversity) of the submitted EIAR. This loss will be compensated by managing, replanting and enhancing hedgerows and scrub as part of the management of agricultural lands (see Appendix 2-1 BMP Section 5.1.1.2 d. and e. of the submitted EIAR). The designated enhancement lands will be managed to provide improved ecological habitat by planting and enhancing hedgerows and designating areas for scrub encroachment in appropriate locations as agreed with the landowner which will be formulated in a farm plan in cooperation with a suitably qualified farm plan ecologist.

The enhancement measures, mitigation measures and the onsite ECoW will prevent any significant effects.

2.2.28 Aquatic Environment

2.2.28.1 Survey Methodology

Eleven observations raise concerns about the aquatic survey methodology carried out at the River Finisk and River Colligan HDD crossing locations. Aquatic surveys were carried out at these sites as shown in Figure 2-1 and Table 2-1 of Section 2.2.1 of Appendix 6-3 Aquatic Report of Chapter 6 (Biodiversity) of the submitted EIAR. These aquatic sites and eDNA sampling

points were selected by an experienced aquatic ecologist which were typically located at a site boundary, a river crossing or further downstream as a control. The aquatic sites comprised kick sampling for macroinvertebrates (to determine the Q-value), a habitat suitability assessment for salmonids, crayfish and otter based on riverbed substrates, bank composition and vegetation as described in Section 2.2.3 to 2.2.8 of Appendix 6-3 Aquatic Report of Chapter 6 (Biodiversity) of the submitted EIAR. eDNA surveys were carried out to further determine the presence or absence of aquatic species, the survey results rely first and foremost on the aquatic survey that was carried out.

The Colligan River aquatic survey was carried out approximately 1km upstream of the proposed river crossing. The good water quality result (Q4) of this survey Site 23 (see Appendix 6-3 Aquatic Report of Chapter 6 (Biodiversity) of the submitted EIAR) was deemed to be representative of the updated location of the GCR crossing downstream. At this location an aquatic survey was carried out which assessed the habitat to be of similar high quality for salmonids and otter (see habitat legend 'FW1 – Eroding/ upland Rivers' of Figure 6-3G Habitats of Chapter 6 (Biodiversity) of the submitted EIAR). The prescribed aquatic mitigation measures will ensure no effect will occur on the Colligan River or its protected aquatic features.

Horizontal Directional Drilling impacts are described in Section 6.7.3.1.1, 6.7.4.1.1, 6.7.4.1.8. The proposed mitigation measures, which are set out in Section 6.8.1.3.1 of Chapter 6 (Biodiversity) of the submitted EIAR, will prevent any impacts to surface water bodies including the River Finisk and River Colligan.

2.2.28.2 White-clawed crayfish

Two observations raised concerns about impacts to crayfish. During the aquatic surveys no crayfish were caught at any site during kick sampling and no otter spraints were recorded with crayfish remains. The NBDC database and the NPWS sensitive data request show no records of crayfish in the relevant rivers. Additionally, the eDNA surveys did not detect any crayfish at any of the aquatic sites as shown in Section 3.2.4 of Appendix 6-3 Aquatic Report of Chapter 6 (Biodiversity) of the submitted EIAR. However, it is acknowledged that crayfish are likely to be present at aquatic site 21 (River Finisk) and at aquatic site 23 (River Colligan) as described in Section 3.2.2 of Appendix 6-3 Aquatic Report of Chapter 6 (Biodiversity) of the submitted EIAR.

The mitigation measures proposed in Section 6.8.1.3.1 of Chapter 6 (Biodiversity) of the submitted EIAR will prevent any impacts to surface water bodies including the River Finisk and River Colligan and their associated aquatic species including white-clawed crayfish.

2.2.28.3 Freshwater Pearl Mussel

Two observations raised concerns about the presence of suitable habitat for freshwater pearl mussel (FPM). No historical records indicate the presence of FPM and this species was not recorded during the surveys or eDNA sampling as shown in Section 6.5.2.27.1 of Chapter 6 (Biodiversity) of the submitted EIAR.

2.2.28.4 Amphibians

Two observations relate to common frog and smooth newt. The common frogs recorded along the GCR were located in grasslands, not near any potential breeding feature such as a pond or a

ditch, no specific frog habitat was recorded along the GCR. Similar to smooth newt, no suitable pond or standing water was recorded along the GCR.

The prescribed mitigation measures are inclusive of the GCR and are described in Section 6.8.1.4.4 and 6.9.3.3 of Chapter 6 (Biodiversity) of the submitted EIAR. There will be no significant adverse effects.

2.2.29 Common Lizard

One observation relates to common lizard and relates to a textual mistake referring to common frog. The correct paragraph text of Section 6.3.2.2.3.3 Common Lizard of Chapter 6 (Biodiversity) of the submitted EIAR should read: *The Common Lizard is widespread in Ireland and occurs in suitable habitats such as stone walls, dry banks, heathland and bog habitats (King et al., 2011). Suitable habitat was searched for the presence of* ***common lizard*** *during the walkover surveys.*

2.2.30 Mammals

2.2.30.1 Otter

Six observations relate to otter. Otter surveys were carried out at all aquatic sites and the results are described in Section 3.2.3 of Appendix 6-3 Aquatic Report of Chapter 6 (Biodiversity) of the submitted EIAR. A key indicator of otter being present are otter spraints. No otter spraints were recorded at any of the aquatic sites. However, it is acknowledged that otter is likely present on the lower elevation reaches of the River Farnane, River Finisk and River Colligan. No holts were recorded; therefore no derogation licence needs to be acquired at this time.

Mitigation measures for otter are described in Section 6.8.1.4.1 and 6.9.3.1 of Chapter 6 (Biodiversity) of the submitted EIAR which will ensure that significant effects are avoided.

2.2.30.2 Red Squirrel and Pine Marten

One observation was concerned about Red Squirrel and Pine Marten habitat loss. Section 6.7.4.1.4 of Chapter 6 (Biodiversity) of the submitted EIAR concludes that no significant negative effect will occur on red squirrel and pine marten by the removal of 50m by 5m of non-native conifer plantations and native scrub habitat for the GCR.

The removal of this habitat will cause temporary disturbance but will not cause any significant effect or fragmentation of habitat.

2.2.31 Butterflies

Two submitted observations relate to marsh fritillary. Habitat surveys were carried out along the GCR. The Applicant notes that as the GCR will be constructed primarily under existing roads, only overhanging treelines were recorded. The only area where the GCR crosses habitats is north of the Colligan River crossing. The habitats recorded here included Agricultural grassland (grazed or cut), treelines and mixed conifer woodland. No devil's-bit scabious was recorded within these habitats (see Figure 6-3G Habitats of Chapter 6 (Biodiversity) of the submitted EIAR).

As no suitable habitat was recorded or will be impacted, no significant effects will occur on marsh fritillary.

2.2.32 Bats

2.2.32.1 Disturbance of roosting bats during trenching works.

Concerns were raised regarding the potential disturbance of roosting bats during trenching works along the GCR. This issue has been fully assessed. The initial ecological report identified a small number of trees along the GCR that contained potential roost features (PRF). These were recorded on a precautionary basis only. The report clearly stated that further at height inspection would be required only if any of these trees were to be felled or pruned.

The grid connection has been designed to avoid impacts on the PRFs previously identified. The vast majority of trenching will occur within the grassy roadside verge, outside root protection zones and without interaction with tree cavities or PRFs. A short section of the route (approximately 50 m) will require clearance of some scrub/trees within Inchadrisla Wood; however, these trees were examined during the survey and no PRFs were identified. As such, the circumstances that would trigger an at height inspection do not arise at this stage. Notwithstanding this, as PRFs can change over time, a confirmatory pre-construction re check will be undertaken prior to works to confirm current conditions.

It is important to distinguish between potential roost features and confirmed roosts. Ground level assessment identifies features that could theoretically support a roost; however, only a very small proportion of such features contain active roosts. On the basis of the route design, survey findings, and preconstruction safeguards described above, there is no plausible mechanism by which the proposed trenching works could disturb a bat roost at this time.

A standard stop work procedure will be implemented during construction. Should any unexpected evidence of a roost be encountered, works will cease immediately and NPWS guidance will be followed.

On this basis, the risk of disturbance to roosting bats from the proposed trenching works is assessed as negligible, and no significant effects on bats are predicted.

2.2.32.2 Lifespan of the report

The surveys specific to this element of the project were carried out in October 2023 with an additional site visit carried out to some parts of the route in November 2024. A submission suggested that the bat survey information supporting the application is “more than two and a half years old” and that the assessment lacks up to date research or consideration of new findings. The Applicant notes that at the time of application submission (October 2025), the data was between one and two years old. The bat baseline and associated assessments remain valid, current, and fully compliant with recognised national and international guidance.

Validity of Survey Data

The bat surveys informing this application were undertaken in accordance with the NatureScot Bats and Onshore Wind Turbines – Survey, Assessment and Mitigation methodology, which is the accepted standard across Ireland and the UK. NatureScot’s 2024 pre application guidance

states that bat surveys normally remain valid for two further survey seasons, and only require repetition if:

- an application is delayed beyond the start of a third season, and
- there is evidence of substantive change in habitat, land use, or bat activity.

No such changes have occurred along the GCR. Habitats remain stable, and there have been no developments, clearances, or alterations that would materially affect bat activity. The survey data therefore remain within the recognised validity period and continues to provide an accurate baseline.

Consideration of new information

The assessment incorporates all relevant information available at the time of submission, including the NPWS Observation for the Scart Mountain Wind Farm. The Observation does not introduce new data that would alter the baseline or require additional survey effort for the GCR. The mitigation hierarchy and risk assessment remain aligned with NPWS expectations.

Bat populations do not fluctuate in a way that invalidates survey data year to year unless there is substantive habitat change. As no such change has occurred, the baseline remains robust.

Consultation with IWT and BCI

One submission suggests that further attempts should have been made to obtain responses from the Irish Wildlife Trust or Bat Conservation Ireland (BCI). Non statutory consultees are not obliged to respond to project specific consultation requests, and the absence of a response does not indicate any deficiency in the assessment.

Consultation is typically undertaken during scoping and early assessment. Further engagement is only required where new information arises or where consultees request additional dialogue. Neither circumstance applied here.

The reference to the ecologist's voluntary role within BCI is misplaced. Professional ecological assessments are undertaken independently and in accordance with published guidance, regardless of voluntary affiliations.

Overall conclusion

The bat baseline, consultation record, and impact assessment remain current, valid, and aligned with the most up to date guidance, including NatureScot (2024), BCT (2023), NPWS (2022), and NIEA (2021). No new information has emerged that would alter the conclusions presented.

2.2.32.3 Bat surveys and Colligan Wood, Modeligo Bridge and Inchadrisla Wood

A submission stated that no bat survey was carried out for the GCR, particularly at Modeligo Bridge, Colligan Wood and Inchindrisla Wood. This is not correct. A preliminary bat assessment was undertaken along the full GCR, which is the appropriate and proportionate level of survey effort given the low ecological impact pathway associated with the proposed works.

The GCR involves installation of a cable along an existing track and roadside corridor. An approximately 50 m portion will be required to traverse woodland at Inchadrisla woods however these trees were assessed and did not contain a PRF. The works will not require

- tree felling of trees containing a PRF,

- vegetation clearance of roost bearing features,
- works to buildings/structures, or
- any alteration of bat commuting routes or foraging habitat.

Given this very low level of potential impact, a preliminary assessment is the appropriate and proportionate level of survey effort under national guidance.

Purpose of the GCR Bat Assessment

The assessment focused on identifying trees or structures with potential roost features, as trenching and cable laying do not create a pathway for disturbance of general bat activity.

A small number of trees with potential roost features were identified. None of these trees are expected to be impacted. If any tree unexpectedly requires removal or pruning, an at height inspection by a licensed ecologist and arborist will be undertaken prior to works.

Colligan Wood and Bat Activity Records

The submission references citizen science bat walks and historic Waterford Bat Group records showing that several bat species forage within Colligan Wood. This is entirely expected for a mature riparian woodland and does not contradict the ecological assessment.

The bat walk referenced (19 August 2025) recorded three common foraging species—Soprano Pipistrelle, Common Pipistrelle and Leisler's. These species are widespread and regularly forage along woodland edges and rivers. Their presence confirms normal bat activity in the wider landscape but does not indicate roosts within the works area.

The Waterford Bat Group's historic note that "six of the nine Irish bat species occur in Colligan Wood" reflects general woodland biodiversity, not roost locations or sensitivity to ground level works.

Roost Suitability vs Bat Activity

It is essential to distinguish between:

- Bat activity — foraging and commuting behaviour in the wider landscape.
- Roost suitability — features capable of supporting maternity or hibernation roosts.

The GCR assessment was concerned with roost suitability, as this is the only potential impact pathway. No suitable roost features occur within or immediately adjacent to the works footprint, and no tree or structure works are proposed. Therefore, even if Colligan Wood supports multiple bat species, there remains no risk of roost disturbance.

Proportionality of Survey Effort

National guidance (BCI, CIEEM, NPWS, NatureScot) emphasises that survey effort must be proportionate to the scale and nature of the works. Large scale turbine related bat surveys are not required for low impact linear infrastructure.

At Modeligo Bridge, the Finisk River will be crossed using HDD, meaning the bridge structure and riparian trees will not be impacted.

The preliminary assessment undertaken is therefore appropriate, proportionate, and fully compliant with best practice.

Conclusion

The GCR works present no risk of roost disturbance, and the survey effort applied is consistent with national guidance for low impact linear infrastructure. The presence of foraging bats in Colligan Wood is expected and does not indicate any deficiency in the assessment or any requirement for additional survey effort. The precautionary identification of a small number of trees with potential roost features has been fully addressed through a clear at height inspection protocol should any such tree unexpectedly require works.

2.2.33 Appropriate Assessment (Natura Impact Statement)

Four observations express concerns about impacts on the Blackwater River (Cork/Waterford) SAC, the Blackwater Estuary SPA and the Dungarvan Harbour SPA. The main concerns raised relate to the release of hydrocarbons, drilling fluids and other pollutants that may occur from the GCR works.

For a reply to these observations please refer to Section 2.1.4.1 of this document.

2.2.33.1 Cumulative / In-Combination Effects

Three observations raised concerns about potential cumulative / in-combination effects of Dyrick Hill Wind Farm (case ref: 317265; refused permission in October 2024), and Coumnagappul Wind Farm (case ref: 318446; refused permission in April 2025) in combination with the proposed project. As the refusal of both wind farms had not been confirmed prior to Scart Mountain Wind Farm being submitted for planning permission, a robust assessment was carried out in relation to cumulative / in-combination effects as referred to in Section 6.3 of the submitted NIS and Section 6.10.1 of Chapter 6 (Biodiversity) of the submitted EIAR). Cumulative/in-combination effects caused by both of these wind farms are no longer applicable due to their confirmed planning refusal. Regardless of this, no unacceptable cumulative/in-combination effects were found to arise when these were considered.

No significant in-combination residual effects were determined (see Section 6.11 of Chapter 6 (Biodiversity) of the submitted EIAR) after the application of the prescribed mitigation measures and the implementation of the BMP to compensate for habitat loss (see Appendix 2-1 BMP of the submitted EIAR).

2.2.34 Survey Validity

One observation raised concerns about the validity of the ecological surveys. The final habitat surveys were carried out in January 2024 (see Table 6-2 of Section 6.3.2 of Chapter 6 (Biodiversity) of the submitted EIAR). The proposed development was submitted for planning in October 2025 which covers 21 months. According to the advice note on the lifespan of ecological reports and surveys (CIEEM, 2019) it falls into the age of data class of 18 months to 3 years. This means that a professional ecologist will need to undertake a confirmatory pre-construction survey and carry out a desktop study evaluation prior to construction.

Confirmatory pre-construction surveys will be carried out prior to any works commencing by the appointed suitably qualified ECoW who will carry out confirmatory pre-construction surveys of all relevant ecological features (See Section 6.9 of Chapter 6 (Biodiversity) of the submitted EIAR).

2.2.35 Hen Harrier

One submission raises concerns around the provision within the EIAR that would allow construction works within 1 km of a Hen Harrier breeding site. This provision relates to the wind farm development, which is the subject of a separate planning application. The GCR does not include any works within 1 km of known Hen Harrier breeding sites identified in the EIAR, with the route located more than 2 km from these sites.

Hen Harrier nest locations are known to vary between years, as demonstrated by the seven years of monitoring carried out for this project. The EIAR therefore includes mitigation measures to address the potential for breeding sites to occur within the zone of influence of the proposed development, including the grid connection, in any given year. These measures would apply in the event that such a situation arises.

As stated in Section 7.5.2 of the EIAR, pre-construction confirmatory surveys will be carried out. If nesting Hen Harriers are identified, a suitably experienced ornithologist will undertake an assessment to determine the construction restrictions required to avoid disturbance. This assessment will begin with a precautionary potential disturbance buffer of 1 km around the nest site. However, depending on the nest location and the nature of the works, some lower-intensity construction activities may be possible within this distance without causing disturbance.

This approach reflects a range of construction activities that will occur during the project and recognises that factors such as topography and vegetation can provide effective screening. Goodship and Furness (2022)[2] note that disturbance sensitivity in Hen Harrier varies with the type of activity and its visibility, with visual exposure to human activity identified as a key factor. Consequently, some minor works that are not visible from the nest site and do not generate significant noise may be undertaken within the 1 km buffer without posing a significant disturbance risk.

Although there are no currently known Hen Harrier nest sites within 1 km of the GCR, in the event that one is found pre-construction, the mitigation detailed in the EIAR will be implemented to ensure there is no significant risk to the species.

2.2.36 Kingfisher and Grey Wagtail

One submission raises concerns around the assessment of potential impacts to Kingfisher and Grey Wagtail and the mitigation measures proposed for these species.

The submitted EIAR focused on the potential impacts from the crossing of the Colligan River because that will require a new crossing of the river in an undisturbed area. The proposed mitigation measures in Section 7.5 (Chapter 7) of the submitted EIAR state that "*Construction work on the proposed GCR crossing of the Colligan River will only take place during the Kingfisher and Grey Wagtail breeding seasons if appropriate surveys have shown that there are no Kingfishers or Grey Wagtails breeding in the vicinity of the crossing*" (Section 7.5.4). While the submission references this statement, it does not identify any specific deficiencies in this proposed mitigation.

[2] Goodship, N. M., & Furness, R. W. (2022). Disturbance Distances Review: An updated literature review of disturbance distances of selected bird species. NatureScot Research Report 1283.

While the proposed crossing of the Finisk River is at the site of an existing bridge, the submission correctly points out that this bridge provides potentially suitable nesting habitat for Grey Wagtail. As discussed below, any potential (unmitigated) impacts from the GCR to occupancy of Grey Wagtail nest sites would be limited to one breeding season and are not likely to have any long-term consequences. A similar mitigation requirement will be applied for this crossing as that specified for the Colligan River crossing above (see Section 7.5.4 of the submitted EIAR) would address any potential impacts to breeding Grey Wagtails if they do nest at this bridge.

The submission also raises concerns around the classification of the potential impacts as temporary. As stated in Section 7.2.8.10 of the EIAR, the impact significance was described using the terminology from the EPA Guidelines (EPA 2022). These guidelines define temporary effects as "effects lasting less than a year". The overall construction work on the GCR is expected to take nine months, with works at any one location being much shorter than that, so any potential impacts would be limited to one breeding season. In some circumstances, short-term impacts could have long-term consequences, as noted by the submission. This could occur if, for example, the short-term impact caused regional extinction of a bird population with little likelihood of recolonisation. However, such a scenario is not applicable to the present case. Both Kingfisher and Grey Wagtail are widespread in suitable habitat and are not dependent on a single breeding location. Both species regularly occupy linear watercourses and can shift breeding territories between seasons. The potential impact is limited to temporary disturbance at a single site, after which habitat conditions would return to baseline. Given the persistence of suitable habitat, reoccupation of the site in subsequent seasons is likely. Therefore, even as a worst case, if breeding did not occur at this location in one year, this would represent a localised and short-term effect and would not result in any lasting change in population size or distribution.

The submission interprets statements in the submitted EIAR (Chapter 7) regarding potential disturbance to breeding Kingfisher and Grey Wagtail as indicating that construction works may take place during the breeding season without restrictions. This is not the case. The statements referenced are presented in the Potential Effects section of the submitted EIAR Chapter 7, which describes the maximum potential effects in the absence of mitigation, in accordance with standard EIAR methodology as set out in Section 1.6.1 (Chapter 1) of the submitted EIAR. They do not represent the proposed construction approach. As set out in Section 7.5 of the submitted EIAR (Chapter 7), appropriate mitigation measures will be implemented to avoid disturbance to breeding birds, including restrictions on works where necessary.

The submission also raises concerns around the lack of assessment of the cumulative impacts of the construction of the GCR in-combination with similar work from other wind farm projects. It is noted that such cumulative impacts would only occur if the GCR construction work for multiple projects occurred in the same breeding season and in the same area. Such overlap is unlikely as two of these projects (Dyrick Hill Wind Farm and Coumnagappul Wind Farm) have since been refused permission and the consent for the remaining permitted solar farm grid connection project (Sunrise Energy Supply Limited) will have expired by 2028, so overlapping construction periods with this project are unlikely. Furthermore, implementation of the proposed mitigation for the proposed Scart Mountain GCR would eliminate the potential impacts from that project, meaning cumulative effects would not be experienced here.

It is worth noting here that the above projects were among those considered in the cumulative impact assessment of Chapter 7 of the submitted EIAR.

Overall, the potential impacts from the GCR to Kingfisher and Grey Wagtail are limited and not likely to have long-term consequences and these impacts will be effectively addressed by the proposed mitigation.

2.2.37 Colligan Wood and Inchadrisla Wood

Two submissions raise concerns around the lack of assessment of bird populations in Colligan Wood and Inchadrisla Wood and the duration of the proposed mitigation relating to avoidance of works during the nesting season

The ornithological assessment submitted with the planning application focussed on bird populations of potential conservation significance where there was potential for significant impacts arising from the proposed project. A scoping exercise was carried out to assist with determining the survey requirements for the assessment.

The grid connection route runs along a minor road between two sections of woodland before joining the R672, continuing along its eastern side of Ballylemon Wood, crossing the Colligan River, and passing through the southern edge of Inchadrisla Wood. These are all commercial forestry plantations.

No significant impacts to bird populations of conservation importance were predicted for the proposed development, given the modified nature of these habitats and the small scale and short duration of the proposed works at any one location. On this basis, site-specific bird surveys at these locations were not considered necessary. While no likely significant impacts will arise from the proposed development, works will be avoided during the bird nesting season as a precautionary best-practice measure.

2.2.38 Excavation of material and water supplies

Concern was raised in a number of observations around the excavation of material on the GCR and the potential for impacts on local wells and on the Modeligo Public Water Supply (PWS) / Ballinamuck/Dungarvan PWS, suggesting they were not adequately assessed in the EIAR. Bawnfoun/Moore's Well was also suggested as a water source that could possibly be affected.

There were no likely significant effects on water supplies identified as a result of excavations along the proposed GCR. Excavations on the grid route are described in Chapter 8 (Land, Soils and Geology), and in the Appendix 2-5 (GCR Construction Methodology) of the submitted EIAR. Further detail can also be found in the accompanying planning drawings submitted as part of the application. The proposed GCR works are largely located within the corridor of public roads and do not require piling, blasting, or deep foundations. The methods used are similar to those for laying standard water mains or telecommunications infrastructure, which are routinely installed adjacent to public water assets without incident. This is a shallow, near-surface activity that occurs within the upper subsoil layers. In contrast, the public and private wells in this region typically draw from deeper groundwater aquifers. No activities are proposed in the vicinity of the PWS sources that could alter groundwater flow paths or levels. Pipework from the sources are already laid in the road corridor. The proposed GCR works pose no greater risk to local water

supplies than routine road maintenance or the installation of standard service pipes, and the mitigation measures outlined in the EIAR are sufficient to ensure continued water security.

The subsoil deposits overlying the bedrock are not considered to be of sufficient lateral extent or depth to represent a significant aquifer body. The trench within the road is similar to other utility installations. The standard trench is approximately 0.8 m wide, and approximately 1.3 m deep. Each section of trench that is opened will be completed before the next section is opened and therefore the excavation is limited in extent and duration. Cable laying is transient in nature with works at any one location only lasting for a short period (typically 150m laid per day with excavations normally filled in at the end of each day). There are also no wells within the public road corridor, or near the off-road sections of the GCR. Based on the above, the proposed works will not result in direct or indirect adverse effects on private wells. The cable ducts will be installed, the trench reinstated to a specification to be agreed with Waterford City and County Council.

Modeligo Public Water Supply (PWS) is addressed in Chapter 9 of the EIAR where the nature of the infrastructure (shallow trench being capped by a sealed road surface) and the mitigation described (including mitigation by design and protection of watercourses) will ensure that there are no significant residual effects on the Modeligo PWS. This is also further discussed in Section 2.2.38 of this document as well as in Section 9.4 and 9.5, (Chapter 9) of the submitted EIAR.

2.2.39 Soil/Peat Stability

A concern was raised relating to soil stability and peat along the proposed GCR. The proposed GCR is located primarily in public road corridors where there are no known peat soils. As shown in Figure 8-4 (Chapter 8) of the submitted EIAR (reproduced below for convenience of the reader), there are no mapped (by GSI) peat soils located along the GCR and no peat was identified during site visits. Therefore, the concerns raised relating to peat and soil stability are not applicable to the proposed GCR. Figure 8-4 is included below.

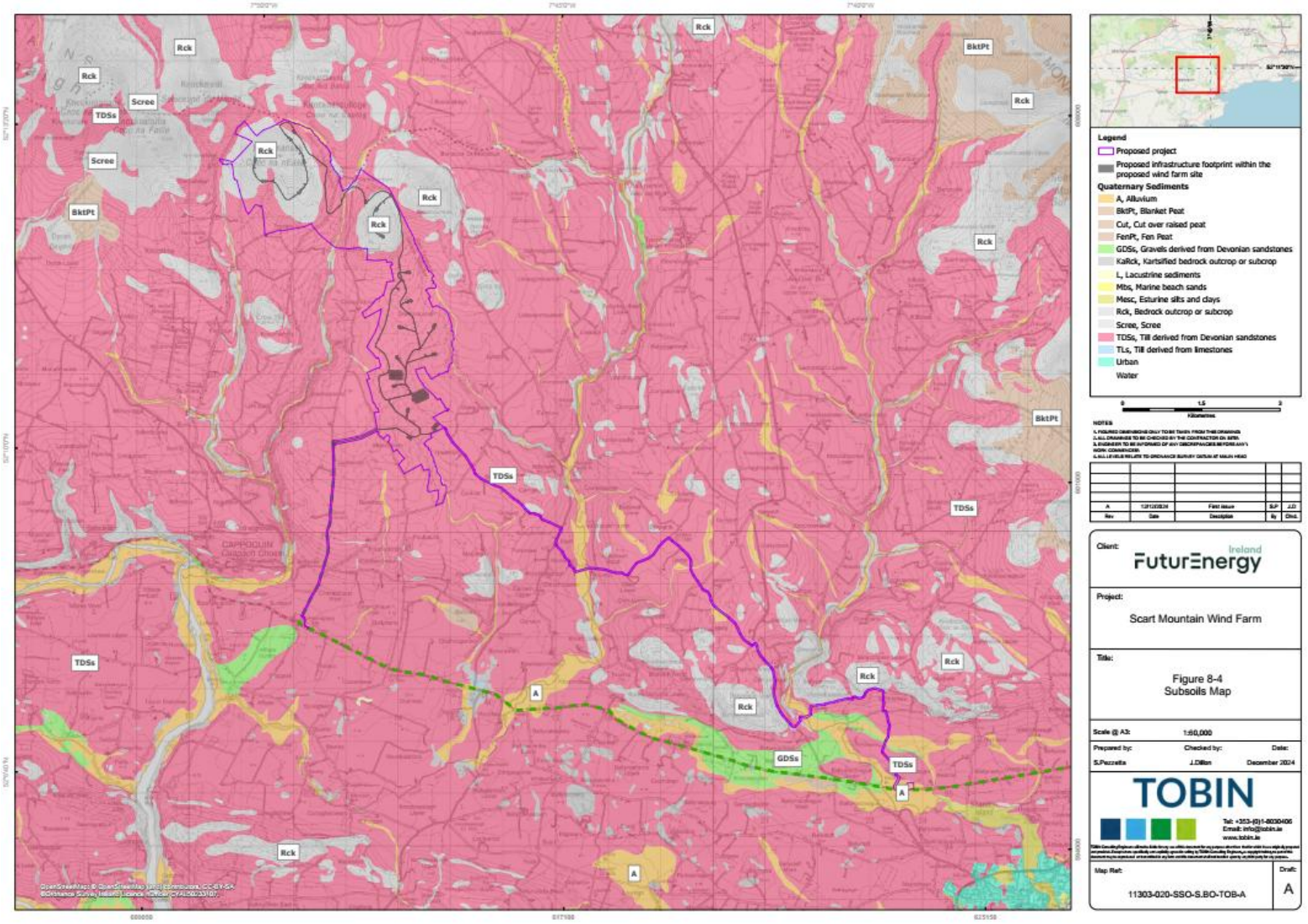

Figure 4 Reproduction of submitted EIAR Figure 8-4 for information purposes – see Figure 8-4 in Chapter 8 of EIAR for full details

2.2.40 Boreholes

One observation claimed that boreholes can lead to "major issues in the future" and thus an assessment must be conducted on site to ensure that no negative effects occur. The comment did not provide any further details. Boreholes were used as part of the site investigation works for the proposed project, and these were completed to a high standard (in accordance with BS 5930)[3] with no contamination. Should any future boreholes be required as part of the pre-construction investigations, they will be carried out to the same standard. The use of boreholes does not pose a significant risk in terms of soil or water contamination when carried out properly (in accordance with BS 5930).

2.2.41 Surface Water Quality

A number of observations were submitted with comments concerning the potential effects of the proposed GCR on surface water quality of waterbodies within and in close proximity to the proposed GCR site.

2.2.41.1 Water Framework Directive

2.2.41.1.1 High Status Objective Rivers of Ireland

A number of observations raised matters in respect of the WFD, with a focus on the current Status of the Colligan and Farnane Rivers, and the potential for short-term effects on these surface water bodies.

In relation to the GCR, the cable will be laid predominately within the existing road corridor. The presence of the cable will not result in a deterioration of the high status. Fundamentally the main pressures on the catchments are agriculture and wastewater. The proposal does not alter these pressures.

The status of each WFD subbasin is determined and included in the WFD Compliance Assessment, available as Appendix 9-1 of the EIAR. The status of the river bodies is outlined in Section 9.3.2 in Chapter 9 of the submitted EIAR and the WFD compliance assessment. The current WFD status (data accessed on 12th March 2026) is based on updated status period (2019-2024). All river subbasins at the GCR are at Good or High Status. The proposed construction methodologies and associated mitigation measures are consistent with the current best practices and have been used successfully for projects around Ireland over many years.

The measures outlined in the WFD Compliance Assessment, SWMP (Appendix 2-10 of the EIAR) and in Chapter 9 of the submitted EIAR, are comprehensive and will treat runoff from the proposed project (including the GCR). The temporary to short term construction phase will not result in a deterioration in surface water flow or quality.

Research from Heal et. al. (2019) looking at long-term monitoring at the Whitelee wind farm in Scotland, one of Europe's largest onshore wind farms, revealed that even where there might be a temporary increase in macronutrients, these effects were localised and water quality

[3] BS 5930 (Code of practice for ground investigations). This includes water protection measures.

recovered to pre-construction levels soon after the construction phase[4]. The research underscores that adherence to best practice guidelines, such as limiting disturbance, managing runoff, and avoiding sensitive areas, can minimize and rapidly reverse any short-term impacts on surface water quality. A large number of catchments where cables were constructed maintained good to high status both during and after construction. As detailed in Chapter 9 of the submitted EIAR, the potential effects during the construction phase of the proposed GCR are negative, slight/ indirect, short term and unlikely on surface waterbodies.

Effective implementation of the SWMP measures is key and works on the GCR will cease under the direction of the Environmental Manager in the unlikely event that mitigation measures aren't performing as required, as stated in Section 9.5.1.1, (Chapter 9) of the submitted EIAR. The methods listed in the EIAR and SWMP are proven mitigation measures and have been carefully chosen to reduce potential impacts.

The site will undergo regular audits as set out in Section 2.2 of the CEMP and will be monitored as detailed in the SWMP. There will be continuous turbidity monitoring both upgradient and downgradient on these rivers during the pre-construction phase and the construction phase, as outlined in the SWMP. There will also be extensive surface water monitoring during pre-construction, construction and post-construction, including visual inspection, water sampling and site walkovers. These measures, along with further mitigation measures outlined in Chapter 2, Chapter 9 and the CEMP, will be implemented to ensure that the proposed project will not compromise progress towards achieving Good Ecological Status or cause a deterioration of the overall status of these surface waterbodies during the construction or operational phases (current status varies from good to moderate).

2.2.41.1.2 Programme of measures

The WFD assessment addressed both the wind farm and the GCR. There are no likely significant effects as a result of the proposed GCR on streams or rivers. The WFD status was updated in October 2024, before the submission of the two planning applications. The updates were reviewed as part of this response, however there are no changes in the current status with all river subbasins and groundwater bodies at good status.

The Water Action Plan (WAP) 2024 is the overarching strategy, outlining Ireland's roadmap to protect and restore water quality from 2022-2027. There is a list of measures, or environmental improvements, which have been identified by the WAP 2024 (known as the Programme of Measures (PoMs)), which need to be implemented in order to improve the ecology of water bodies by a specified date in order for Ireland to meet the target date set by the WFD. The WFD compliance assessment considers the PoMs and assesses whether the proposed project can contribute to them or prevent any of them from being delivered.

These measures are set at a catchment scale and relate primarily to agriculture. The Water Action Plan 2024 states that "Agriculture is the most common significant pressure impacting 1,023 water bodies" (DHLGH, 2024). Agriculture is not identified as a significant pressure in the relevant GCR subbasins and no significant alteration to agricultural lands use will occur as a result of the proposed project. Similarly, forestry is identified as a pressure in a number of river basins however it is not identified as a significant pressure in the Finisk and Colligan river

[4] https://doi.org/10.1007/s13280-019-01200-2

subbasins. The nature of the works will not impede achievement of the PoMs, nor is it considered to impede any water body from reaching 'good ecological status' or 'good ecological potential'.

2.2.41.2 Hydrocarbon leaks

Two observations raise concerns around the risk of hydrocarbon leakage during the horizontal directional drilling (HDD) process. The applicant clarifies that the HDD) process proposed for the watercourse crossings, as detailed in Chapter 2 (Description of the Proposed Project) of the submitted EIAR does not inherently pose a significant risk of hydrocarbon release to the aquatic environment. Firstly, the primary fluid used in HDD is a bentonite-based slurry, which is a naturally occurring, non-toxic inert clay. This is used for lubrication and borehole stability and does not contain hydrocarbons. Secondly, the risk of accidental hydrocarbon release from the drilling machinery is managed through rigorous, site-specific mitigation measures as outlined in the CEMP (Appendix 2-8 of the submitted EIAR). These include the use of buffer zones around watercourses, secondary containment, and refuelling and emergency response protocols. These measures, combined with the trenchless nature of the work which avoids all instream disturbance, ensure that the water quality of the watercourses is protected.

2.2.41.3 Silt Fencing

One submission raised concerns with the use of silt fencing as a sole means to prevent runoff and highlighted some potential issues with the use of this as a sediment control measure.

Silt fencing is only one method highlighted for use in the EIAR along with settlement tanks, sandbags and check dams. To ensure the protection of all sensitive receptors along the proposed GCR, the applicant has implemented a "Source-Pathway-Receptor" mitigation model, where silt fencing is merely one component of a larger, integrated sediment control system. A SWMP (Appendix 2-10) and CEMP (Appendix 2-8) are included with the submitted EIAR which outlined the methods proposed.

2.2.41.4 HDD Crossings and Bentonite

Two third party observations raised concern relating to the risk associated with contamination from bentonite used for HDDs, which are hydrologically connected to EU sites. This is addressed in Section 2.1.4.2 above.

One of the observations also raised further concerns that bentonite can contain bacteria and metals such as lead arsenic and mercury, and stated that soil permeability may be reduced, which may impact on aquatic biodiversity. The bentonite utilised will be of high-grade, NSF-certified environmental quality, free from the heavy metal contaminants. As an inert, non-toxic natural clay, its risk profile is significantly lower than synthetic alternatives. There are no significant residual risks associated with the proposed HDD crossings and bentonite use.

2.2.42 Groundwater Quality and Water Supply Augmentation

Concern was raised in observations relating to the potential for the proposed GCR works to negatively impact on public water supplies, including Modeligo/Newtown and Moore's well. This has been addressed in Section 2.2.38 of this document. The potential risks to the water infrastructure (pipes, etc.) are discussed in Section 2.1.2 of this document.

2.2.43 Project Splitting Concerns

A number of observers contend that the grid connection and wind farm are interdependent projects and that the submission of two separate planning applications to An Coimisiún Pleanála constitutes unlawful project splitting.

The existence of separate consent applications does not, of itself, establish unlawful project splitting where the documentation expressly treats the development as one project for EIA purposes and provides the relevant environmental documentation alongside the application.

The Scart Mountain Grid Connection planning application acknowledges the functional relationship between the two planning applications for the wind farm and its associated grid connection. It also ensures full compliance with the EIA and Habitats Directives by providing a single EIAR and NIS to address and consider the project as a whole.

The planning application documents adequately consider cumulative effects arising from the wind farm and other relevant projects. The statutory public notices and planning documentation demonstrate that both components have been assessed together.

Section 182 of the Planning and Development Act 2000 (as amended) is the appropriate statutory mechanism for such development and this approach reflects the established SID procedure for such development types. Furthermore, the approach has been confirmed during pre-application consultations with An Coimisiún Pleanála, where the Commission accepted Section 182A as the appropriate application route for the grid connection development as required by the Planning and Development Act, 2000 (as amended).

Please refer to the submitted Addendum 4.

2.2.44 Conflict with the Waterford City & County Development Plan

Observers assert that the grid route traverses sensitive landscapes and wind energy exclusion zones and that the development is inconsistent with the Waterford City & County Development Plan (WCCDP) 2022–2028.

The WCCDP differentiates between wind energy policies and provisions relating to linear utility infrastructure. Wind Energy Exclusion Zones apply to turbine development and do not extend to underground electricity transmission cables. Chapter 6 of the WCCDP supports transmission infrastructure where environmental effects can be appropriately mitigated. The Planning Statement and accompanying technical drawings submitted with the application (including grid route layout, and watercourse crossing details) demonstrate alignment with Policies UTL13 and UTL19, which address the development of transmission and distribution infrastructure and require the minimisation of environmental impacts.

The EIAR submitted with the application confirms that the proposed grid route can be delivered without significant adverse effects on landscape, ecology, or other environmental receptors, taking account of the mitigation measures incorporated into the design, such as those specified in the submitted Schedule of Mitigation Measures, Chapter 19 of the submitted EIAR, such as for example:

- No instream works will take place during all phases of the proposed project.

- Silt fences will be erected along all areas where the construction works are within 20m of a stream or river and 10m around stockpiled material. All silt fences will be erected outside of flood zones. The silt fencing will remain in position during the full construction phase of the project.
- Silt fences (woven, high tensile strength heavy porous filter fabric) will be used. No mesh type silt fences will be permitted. Silt fencing will be installed as per the manufacturer's guidelines (the bottom section buried at least 10cm deep) prior to any ground disturbance works.
- The excavated subsoil will be utilised on site and used to create bunds around the proposed facilities to create surface water runoff barriers.
- Excavation works will not be carried out during or following heavy rainfall (i.e. if there is a yellow weather warning or higher in place or 5-mm in a 1-hour period).
- A minimum 10m untouched vegetated buffer zone will be retained between the silt fence and the watercourse.
- No permanent storage of excavated material will be permitted within 50m of the any watercourse within the proposed project or within 10m from drainage ditches, Construction pollution control at clear span bridge and directional drilling sites:
- Spill-kits and hydrocarbon absorbent mats will be stored in the cabin of all construction vehicles. All machine operators and site staff must be fully trained in the use of this equipment.
- All machinery will be regularly maintained and checked for fuel, oil or hydraulic fluid leaks.

The development therefore accords with the relevant utility infrastructure policies of the WCCDP and does not conflict with wind energy zoning provisions, which do not apply to underground cable schemes.

Since the planning application has been submitted for the proposed project, a Supreme Court judgement has been issued relating to the consideration of county development plans, which we believe is of relevance to the consideration of the proposed project. The Supreme Court's judgment in Coolglass Wind Farm Limited v An Coimisiún Pleanála [2026] IESC 5, was issued on 4th February 2026, and provides important support for the proposed project insofar as it confirms that, in determining an application for renewable energy development, ACP must engage in a real and substantive way with the climate benefits of the project.

The judgment emphasises that renewable electricity and climate mitigation benefits of development must be expressly considered as part of the planning assessment or evaluative process. At the same time, the Court made clear that section 15 of the Climate Action and Low Carbon Development Act 2015 (as amended) does not create an automatic presumption in favour of every renewable energy project, but it does require that climate objectives be meaningfully addressed within the decision-making process (emphasis added).

The Climate Action and Low Carbon Development (Amendment) Act, outlines duties for certain bodies (which includes consenting authorities) under Article 15 (1) as follows:

> *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 action 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.

Table 2-1: Article 15(1) of Climate Action and Low Carbon Development (Amendment) Act Criterion

Article 15(1) Criterion	Response of Proposed Development
(a) The most recent approved climate action plan	The proposed grid connection aligns with the most recent approved Climate Action Plan, namely Climate Action Plan 2025, which identifies the transition to renewable electricity as a central part of Ireland's pathway to halving emissions by 2030 and achieving climate neutrality by no later than 2050. The Plan provides that Ireland is to achieve 80% of electricity demand from renewable sources by 2030. In that context, the proposed grid connection would facilitate the transmission of renewable electricity from the associated wind farm to the national grid and would therefore represent essential enabling infrastructure for the delivery of additional renewable electricity generation capacity.
(b) The most recent approved national long term climate action strategy	The proposed grid connection is also consistent with Ireland's Long-term Strategy on Greenhouse Gas Emissions Reductions, which sets out the pathway to achieving carbon neutrality by 2050 and identifies the decarbonisation of the electricity sector as a key component of that transition. By enabling the export of indigenous renewable electricity generated by the associated wind farm to the national electricity network, the proposed development would support the long-term structural decarbonisation of the national energy system.
(c) The most recent approved national adaptation framework and approved sectoral adaptation plans	The proposed grid connection is capable of being advanced in a manner consistent with the National Adaptation Framework, published in 2024, which provides the national strategy for adaptation measures and requires public bodies and infrastructure sectors to plan for climate resilience. While adaptation is distinct from mitigation, resilient and appropriately designed grid infrastructure forms part of the electricity network required to respond to the effects of climate change. On that basis, the proposed development would support a more climate-resilient energy system, subject to detailed design and assessment.
(d) The furtherance of the national climate objective	The national climate objective under the 2015 Act, as amended, is for the State to pursue and achieve, by no later than 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy. The proposed grid connection would support the furtherance of that objective by enabling renewable electricity generated by the associated wind farm to be connected to and transmitted through the national grid. In doing so, it would facilitate the integration of renewable energy into the electricity system and contribute to the transition to a climate neutral economy and the wider decarbonisation of Ireland's energy sector.

(e) The objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State	The proposed grid connection supports the objective of mitigating greenhouse gas emissions by enabling the transmission of renewable electricity from the associated wind farm to the national grid, thereby supporting reduced reliance on carbon-intensive generation. As enabling infrastructure, the development would make an important contribution to national emissions reduction efforts by facilitating the use of renewable energy. In addition, by strengthening the capacity of the electricity network to accommodate renewable generation, the proposed development also supports climate adaptation in a broader strategic sense by improving energy resilience and supporting a more sustainable electricity system.

In this regard, the proposed Scart Mountain Grid Connection planning application is consistent with each of the matters identified in section 15(1)(a)–(e) of the Climate Action and Low Carbon Development Act 2015, as amended, insofar as it would contribute to the delivery of renewable electricity, support national emissions reduction and climate neutrality objectives, and form part of the wider transition to a climate-resilient energy system.

2.2.45 EIAR and NIS Deficiencies

Observers argue that the EIAR and NIS are inadequate, lack complete and precise information, do not properly consider likely effects on European sites, omit climate related ecological pressures, and do not assess HDD river crossings to an appropriate level of detail.

The EIAR submitted with the application comprises extensive supporting appendices addressing biodiversity, ornithology, hydrology, water quality, climate, WFD compliance, flood risk, peat stability, construction methodology, and a comprehensive Schedule of Mitigation. The NIS evaluates relevant pressures and threats identified for Natura 2000 sites and sets out the potential impact pathways in accordance with the Habitats and Birds Directives and applicable EPA and EU guidance. Climate related ecological influences are addressed within EIAR Chapter 14 (Air Quality and Climate) and Chapter 17 (Major Accidents and Natural Disasters).

With respect to HDD river crossings, the legal question is whether the Commission has sufficient complete, precise and definitive information to carry out Appropriate Assessment. Here, the NIS, together with the expressly linked Planning Statement, biodiversity material and crossing-specific drawings, provides that information.

The submitted planning application identifies relevant crossing types and the locations where they arise. The planning application states that the grid connection includes 4 no. watercourse crossings, and that horizontal directional drilling will be necessary when installing the cable across watercourses, with no instream works proposed for any natural watercourse. It also records that the grid connection is hydrologically linked to the relevant European sites. The NIS addresses HDD as a distinct pathway for potential effects and we would refer the Board to the dedicated NIS mitigation section, namely Section 6.2.1.2.3 Horizontal Drilling Measures. The NIS concludes that, with mitigation, the project will not adversely affect site integrity.

HDD and other trenchless river crossing methods are supported by dedicated watercourse crossing drawings (including Scart Stream, the Finisk River, Ballykerrin Stream, and the Colligan

River) and the TLI Grid Construction Methodology, which specifies controls to ensure all construction effects were included within the EIAR assessment.

While third party observers contend that the EIAR and NIS are inadequate and lack complete and precise information, the application is in fact accompanied by a substantial and structured environmental document set, as set out above.

Waterford City and County Council's Heritage Officer records that section 6.1.4 of the NIS assesses likely effects on European site integrity and that, following mitigation, the NIS concludes no adverse effect on the integrity of the Blackwater River (Cork/Waterford) SAC, the Blackwater Estuary SPA or Dungarvan Harbour SPA; the Council's Heritage Officer was satisfied with the mitigation measures set out in Table 6-2 of the NIS.

In addition, EIAR Chapter 14 addresses climate-related pressures relevant to ecology and hydrology, including more intense rainfall, flood risk, water-quality effects and changes in plant and animal distribution, while Appendix 2-5 and the mitigation schedule provide project-specific HDD design, frac-out planning and watercourse-protection measures. Accordingly, it is argued that the EIAR and NIS do not omit or fail to address these matters in any broad or structural sense.

Lastly, it is noted that both the EIAR and NIS were prepared by appropriately qualified specialists, as set out under Section 1.7 Study Team and Contributors to the EIAR, in the submitted EIAR.

2.2.46 Cumulative Impact Concerns

Observers raised concerns that cumulative effects are poorly addressed, particularly regarding overlaps with the Dyrick Hill and Coumnagappul wind farm projects, shared road segments for overlapping grid connections arising from the proposed development, Dyrick Hill and Coumnagappul, and lastly, a concern regarding the cumulative assessment of multiple HDD river crossings.

The EIAR submitted with the application includes a comprehensive cumulative impacts assessment under each specialist chapter. The EIAR and NIS assess cumulative effects arising from all relevant existing, permitted, and proposed developments. Potential construction phase interactions such as overlapping traffic movements and HDD activities are addressed through standard mitigation measures specific to the proposed development, including construction sequencing, traffic management arrangements, and construction methodology for watercourse crossings.

Additionally, it is noted that the planning application is accompanied by a dedicated Traffic Management Plan and a Traffic and Transport assessment. The Planning Statement confirms that a Traffic Management Plan will be implemented before any works take place on public roads, that a verification condition survey will be carried out for all parts of the route within the public road, and that a confirmatory road condition survey, including all road water crossings on the route, will be completed in advance of works. It is also stated that the Traffic Management Plan is a live document and will be updated ahead of construction to address any relevant planning conditions and additional mitigation measures. In that respect, the application does not leave traffic management or temporary road occupation unaddressed; rather, it proposes an adaptive traffic-management framework to govern the works along the public road network.

Lastly , it is noted that both the Dyrick Hill (ABP Ref. 317265) and Coumnagappul (ABP Ref. 318446) wind farm applications have been refused planning permission by An Coimisiún Pleanála but have still formed part of the cumulative assessment provided under this planning application, as it was not certain at the time of application submission, if the potential for Judicial Review for these other applications had passed. They have since been confirmed as refused and do not appear in any searches on Courts.ie. Notwithstanding their recent refusals of permissions, these projects were included in the cumulative impact assessment, and it was found that no unacceptable significant cumulative effects are likely.

2.2.47 Grid Capacity and Energy Output

Observers argue that the project overstates its likely energy yield, and that Waterford is a constrained grid region. They state that additional onshore wind capacity should not proceed until the national grid is upgraded.

The submitted planning application provides a clear statement of both export purpose and scale for the proposed grid connection. The Planning Statement states that the connection is required to export electricity from the proposed wind farm to the existing Dungarvan 110kV substation via a permanent tail-fed 110kV underground cable.

The Planning Statement also quantifies expected annual output at between 262,143 and 331,128 MWh, equivalent to approximately 45,598 to 65,661 Irish households' annual electricity demand. Whether the ultimate operational performance reaches the upper end of that range is a matter of generation forecasting, but the planning application does not present the output as an absolute or guaranteed, instead it identifies a projected range and ties the need for the connection to an existing named grid asset, namely the Dungarvan 110kV substation.

We believe that range is fully justified and supported by planning policy at all levels and as demonstrated in the supporting Planning Statement and Chapter 4 of the submitted EIAR.

Ireland's national target of achieving 80% renewable electricity by 2030 requires ongoing reinforcement and expansion of the transmission system, and all such grid infrastructure is subject to the statutory planning and consenting process. EirGrid, as the national Transmission System Operator, is responsible for planning, developing and operating the transmission network, and all new high voltage infrastructure, such as substations, cables and overhead lines must comply with EirGrid's Transmission Policies and Standards, which govern the design, construction and siting of transmission assets. The proposed wind farm's grid connection infrastructure has been developed in consultation with EirGrid to ensure full compliance with these requirements.

National policy reforms and investment programmes are actively strengthening Ireland's grid to accommodate increasing levels of renewable generation and to support progress toward the binding 2030 renewable electricity target. EirGrid's ongoing system development, regulatory framework, and established compliance processes ensure that new renewable generators, such as the proposed wind farm can be safely and effectively integrated into the national electricity system.

The Government's Climate Action Plan 2024 and 2025 explicitly recognises that additional transmission infrastructure is essential to meet Ireland's renewable energy commitments and requires public bodies to support its delivery, including facilitating optimal routing of

transmission assets through public roads where appropriate. Within this policy context, renewable energy projects and their associated grid connections are supported by an evolving, plan-led planning system that acknowledges the parallel need to deliver both renewable generation and the transmission upgrades required to accommodate that generation on the national grid.

2.2.48 Landowner Consent

Observers assert that the Applicant lacks sufficient legal interest or binding landowner consent for the GCR lands.

The proposed grid connection cable route will be constructed primarily within public roads, with a 2.2 km section within privately owned lands.

Addendum 2 of the planning application form submitted with the application provides the necessary letters of consent required at application stage for Strategic Infrastructure Development involving linear utility works.

In addition, in accordance with Article 22(2)(g)(ii) of the Planning and Development Regulations 2001 (as amended), the works subject of this application will be undertaken by a statutory undertaker having a right or interest to provide services in connection with the proposed development to facilitate connection to the national grid.

2.2.49 HDD Certainty

Observers assert that HDD crossing locations are unclear.

Horizontal Directional Drilling (HDD) is proposed at several key watercourse crossings along the Scart Mountain 110 kV grid connection route. The HDD locations are identified within the submitted planning drawings, particularly in the suite of Watercourse Crossing Detail drawings. The HDD alignment and indicative drill shot are specifically shown in Drawing 05854 DR 218, which illustrates the crossing of Watercourse 1 (Scart Stream). This drawing includes the indicative drilling path, the launch and reception areas, and the required crossing sections.

Additional HDD associated watercourse crossings are set out in Drawings 05854DR219, 05854DR220, and 05854DR221, covering crossings of the Finisk River, Ballykerrin Stream, and Colligan River, respectively, within the grid connection corridor. These drawings are listed within the planning application's drawing schedule and form part of the officially submitted crossing design details.

The Grid Connection Construction Methodology states that detailed site investigation works will be completed at each HDD location, that boreholes will inform crossing depth and design, that each HDD crossing will be designed by a specialist drilling contractor, and that each crossing will be subject to prior EirGrid review and approval. It also requires an Outline Frac-Out Mitigation Plan for each HDD crossing.

Therefore, the submitted planning application includes a structured process for developing the HDD crossings beyond outline stage through investigation, bespoke design and mitigation planning.

2.2.50 Objections to Use of the 2006 Wind Energy Development Guidelines

Observers argue that the 2006 Wind Energy Development Guidelines are outdated, have not undergone SEA, and therefore cannot be relied upon by the Commission.

The application's policy documentation expressly acknowledges both the current legal status of the 2006 Guidelines and the existence of the 2019 draft revised Wind Energy Development Guidelines. It is noted that pending formal adoption of revised guidance, the 2006 guidelines remain the statutory policy guide for the Commission.

Importantly, the submitted EIAR states that the proposed development has been designed in line with the 2019 Draft Wind Energy Guidelines. Even where the 2006 Guidelines remain the operative statutory guidance, the planning application indicates that the project has also been tested against elements of the 2019 draft approach. EIAR Chapter 4 also identifies "grid connections" themselves as one of the subjects expressly addressed by the 2019 draft revisions.

While third party observations are correct to note that the 2006 Guidelines are longstanding, the proposed development does not rely on them in a narrow or outdated way.

The 2006 WEDG remain the operative national guidance issued under Section 28 of the Planning and Development Act until formally replaced. They continue to be applied by planning authorities and by An Coimisiún Pleanála in current decision making.

2.2.51 Community Consultation and Documentation Clarity

Observers state that community consultation was inadequate and that mapping and application materials were insufficiently clear.

Appendix 15 of the EIAR contains a dedicated Community Engagement Report which details a structured programme of engagement undertaken since 2022, including public information events, door to door visits by Community Liaison Officers, stakeholder correspondence, and targeted communication with near neighbours within 2km and with the wider community.

The report identifies a dedicated engagement team, including two named Community Liaison Officers, who have been and remain available to respond to queries on the project throughout the duration of the development period.

The engagement timeline in the report records Newsletter 1 in autumn 2022, accompanied by a project website launch, local media press release and an FAQ/fact file; Newsletter 2 in March 2023 delivered to near neighbours within 2 km with invitations to submit queries or meet in person; and Newsletter 3 in June 2023 with updated layout information, studies and timeline, again distributed first to residents and then to political representatives and community groups.

The report also records a live public webinar on 24 August 2023 attended by 39 participants, of whom 27 were from the local community. The webinar allowed questions in advance and through the online chat function, and any unanswered questions were followed up by email.

In November 2023, a detailed 35-page project brochure was distributed within 4 km of the site to publicise the planned two-day community clinics. The report says that this brochure included information on the wind farm design process, extracts from the EIAR, the final turbine layout

map and photomontages. It was supported by invitations to local political representatives, website updates and local media publicity.

The same report records a virtual exhibition accessible through the project website, containing project overview information, timeframes, team biographies, site maps, archaeology and cultural heritage information, ecology, noise, landscape and visual material, a full set of photomontages, community benefit information and an electronic copy of the project brochure. The report states that the virtual tour received 255 visitors and that the project website recorded approximately 1,400 users and 11,000 clicks on pages or links over the relevant period.

The community clinic process is described in further detail: a pop-up information hub in Cappoquin Community Hall on 24 November 2023, followed by appointment-based community clinics at the Park Hotel, Dungarvan, on 28 and 29 November 2023, where local people could access current project information, meet the team and ask questions. The report says the clinics were supported by direct contact details for the CLOs by phone, text and email.

On this basis we would argue that the proposed development and wider project demonstrates meaningful and engaging consultation.

In addition, the applicant's consultation efforts are consistent with the community-engagement ethos promoted under the Renewable Electricity Support Scheme ("RESS"). Although RESS lies outside the statutory planning code for assessing consultation, the scheme is expressly designed to encourage a productive relationship between renewable energy generators and local communities, and the Department has published a Good Practice Principles Handbook to support that process. Against that background, the engagement measures described in the Community Report — including the use of dedicated Community Liaison Officers, repeated newsletter circulation, a project website, webinar engagement, virtual exhibition material, pop-up information events, community clinics and documented design changes arising from feedback — may be characterised as informed, structured and aligned with the type of ongoing community engagement contemplated by RESS.

The dedicated planning application website provides full access to all drawings, route maps, statutory notices, and supporting documentation.

Appendix A Uisce Éireann: Letter of Confirmation of Feasibility

John Staunton
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24 March 2026

Dear Mr.John Staunton

Re: Diversion Reference DIV26044 Diversion enquiry. Subject to contract | Contract denied

Uisce Éireann has reviewed your enquiry in relation to a Build Over or Near of Uisce Éireann's water main and sewer as part of the proposed Development at Scartmountain Windfarm, Cappoquin, Co. Waterford as indicated on drawing no. 05854-DR-100B Overall Site Location Map.

Based upon the details you have provided with your enquiry and as assessed by Uisce Éireann, we wish to advise you that, subject to valid agreement/s being put in place, the proposed Build Over or Near can be facilitated.

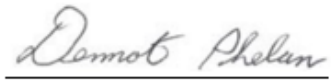
The drawings submitted are at preliminary design stage and as such Uisce Éireann's review of them is based only on the information at hand. The applicant will be required to provide detailed design for each Build Over or Near prior to any agreements being reached, which will need further review and may change the requirements and scope of works involved in the development.

All accompanying drawings with the file detail an undercrossing and the accompanying section 05854-DR-210_Service Culvert Undercrossing Detail are what have been taken to be proposed and deemed to be compliant with Uisce Éireann standard details. Should the physical conditions of the area not allow for the detail to be adhered an alternative must be sought by agreement with Uisce Éireann. All Uisce Éireann assets to be protected and maintained during the works and where necessary suitable temporary works arrangements to be in place to ensure protection of UÉ assets.

You are advised that this correspondence does not constitute an agreement in whole or in part to provide a diversion or to build near any Uisce Éireann infrastructure and is provided subject to Build Over or Near agreement being executed at a later date. You are advised to make contact with the diversions team at diversions@water.ie once planning permission has been granted and prior to any works commencing on site in order to enter into a Build Over or Near agreement with Uisce Éireann.

If you have any further questions, please contact Gary Hughes from the diversions team on email gary.hughes@water.ie. For further information, visit **www.water.ie/connections.**

Yours sincerely,



Dermot Phelan
Connections and Developer Services

www.tobin.ie