Breda Deasy
Castlegannon
Mullinavat
Co. Kilkenny

16/02/2026

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

Case Reference: **VA10.323958**

Application Name: **Proposed development of 110kV Grid Connection Options for Ballyfasy Wind Farm, Ballyfasy, Co. Kilkenny.**

Dear Secretary,

I have grave concerns regarding this proposed development of a 110kV Grid Connection for Ballyfasy Wind Farm, a Strategic Infrastructure Development (SID) combining the proposed Ballyfasy Wind Farm application and this proposed functionally interdependent grid connection.

The applicant was awarded Design Review flexibility by An Coimisiún Pleanála and has provided two options within the applicationof which one will be implemented :

- Grid Connection One (GCO One): underground grid connection to the Castlebanny Wind Farm substation (currently under Judicial Review), spanning the townslands of Ballymartin, Bishopsmountain, Smithstown, Ballymackillagill, Glenpipe, Mullenakill, Coolnahau, Cappagh & Castlebanny, Co. Kilkenny.

- Grid Connection Two (GCO Two): proposed loop-in grid connection to existing Great Island-Kilkenny 110 kV overhead line, located across the townslands Ballymartin, Ballyfasy Upper, and Ballywairy, Co. Kilkenny.

Environmental Impact Assessment Report & Natura Impact Statement:

1. Both the Ballyfasy Wind Farm and the Grid Connection applications are accompanied by an Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS) which apply to the overall project. The area involved is considerable in size and the magnitude of these works potentially extreamly impactful. The works described include Horizontal Directional Drilling (HDD) when installing the cable along a 12km route including public roads, travelling over and through agricultural grassland, plantation, watercourses, masonary bridges and historical monuments.
   This Grid Connection application should have an EIAR & NIS specifically for these works.

2. Habitat and species most affected by construction works relating to this GCO One route were not adequately surveyed.
   Grid connection bat surveys in Ireland for proposed routes are deemed critical. Ecological assessments are required to identify bat roosts, foraging areas and commuting routes such as hedgerows and tree lines in order to ensure compliance with the EU Habitats Directive. This GCO One route has potential for bat roosting, foraging sites and commuting routes including masonary bridges, old stone buildings and walls, hedgerow, mature trees lines, and watercourses along the cable route and within range of GCO One, all of which were not surveyed.
   An ornithology survey report specific to grid connection GCO One was not included in the planning application.
   Limiting surveys to within the wind farm site, for Badger, pine marten, fallow dear, otter etc highlights the potential omission of appropriate habitat and species surveillance of the GCO One route. The reference to the availability of alternative habitat in the surrounding area is disingenueous when the construction of the combined proposed wind farm and the proposed GCO One 12 km route is taken into account. Furthermore the cumulative effect of currently operating wind farms, additional planned and proposed wind farms adjacent to this proposed wind farm and GCO One route will further reduce alternative habitat.

3. Ballyfasy Wind Farm – Volume II EIAR has recorded monuments including Mullenakill Church, graveyard and Mill (AH02) as located immediately east of the proposed GCO One route. The construction works for the proposed laying of cables for this grid connection will involve the excavation of a trench through the site and it is noted that these activities may have permanent direct negative effects on currently unknown associated archaeological remains.

4. The preferred grid connection, GCO One for Ballyfasy wind farm, crosses the Arrigle River and its tributaries. The works require Horizontal Directional drilling (HDD) at six locations. The potential impacts such as frack-outs where drilling fluid escapes through fissures and seeps into waterways causing damage to sensitive ecosystems can have detrimental consequences for the marine and river ecosystems of the river and SAC.

I respectfully request that An Coimisiún Pleanála to refuse planning permission for this development

Breda Deasy