

Name: Breda, Bart, Leah and Emma Ratcliffe

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Application Name: Proposed development of a 110kV Grid Connection for Ballyfasy Wind Farm

Case Reference: VA10.323958

**FORMAL OBJECTION TO: The Proposed Development of a 110kV Grid Connection for Ballyfasy Wind Farm**

Dear Secretary

We are writing as residents who are directly impacted by the proposed Ballyfasy Wind Farm development to formally object to the Proposed development of a 110kV Grid Connection for Ballyfasy Wind Farm.

The applicant was awarded Design Review Flexibility by An Coimisiún Pleanála and has provided two options within the application:

- GCO One: Grid connection to the consented Castlebanny Wind Farm Substation
- GCO Two: Proposed loop-in grid connection to existing Great Island-Kilkenny 110 kV overhead line

My objection is based on the following fundamental grounds:

- GCO One will be constructed primarily within public roads within the jurisdiction of Kilkenny County Council, with a section within privately owned lands. As per Dromada Windfarm (ROI) Ltd v Cremins High Court Case, using such an area without consent constitutes trespass.
- Electromagnetic Interference from the 110kv cable to be laid for the connection to the grid in Castlebanny. This cable is a potential risk to households living within 50m on either side of the underground grid cable. Any person with a pacemaker is identified as at serious risk from this magnetic field. A public health assessment does not seem to be included in the application to determine if there are people that will be impacted.
- Mullennakill Church, Graveyard and Mill are located immediately east of the proposed GCO One. The construction of the proposed GCO One will involve the excavation of a trench through this historic site.
- There was no bat survey carried out on the GCO One grid route as part of the grid connection application. A reference was made to the Tobin (2021) Castlebanny Windfarm Ecological Impact Assessment Report: Chapter 6 Biodiversity - this study is 5 years old and is not specific to the proposed Ballyfasy grid connection route.
- An Ornithology report specific to grid connection GCO One was not included in the planning application.

- Ballyfasy is an area with high radon gas levels and we are extremely concerned that significant excavation will cause radon gas to migrate into buildings that previously had safe levels of radon gas recorded and will potentially increase radon readings in buildings where radon gas was previously not detected. Rock blasting during construction also poses serious risks to private drinking water wells because of the extent and depth of excavation and this will in turn, have serious consequences re: household water supply as there is no alternative mains supply to fall back on. The Environmental Impact Assessment Report (EIAR) in the planning application relies heavily on mitigation measures rather than providing certainty that private water supplies will not be adversely affected. This level of risk is unacceptable.
- A recurring theme throughout the Ballyfasy Wind Farm and Grid Connection planning application is the reliance on post-consent mitigation measures to address impacts. Where a development is of such scale and proximity to residential properties, significant impacts are clearly foreseeable and reliance on mitigation measures alone are inappropriate. Proper planning requires impacts to be avoided or minimised at source, not managed retrospectively.
- The Curlew (an endangered bird species) is present in Ballyfasy as per the Ornithology report submitted by the applicant. They are known to undertake regular low-level flights over distances of several kilometres between breeding, foraging and roosting areas. Overhead grid lines (GCO Two) within these landscapes will potentially present a collision risk even where no nests are recorded immediately adjacent to the route.
- Inadequate Public Consultation: The Applicant's Planning Statement asserts that meaningful public consultation and on-the-ground engagement took place. As per Appendix 1-7 Community Engagement Report p.7 *'We recognise that enabling meaningful engagement between the project team and local residents is imperative if we are to build a high-quality project that benefits everyone. This engagement must go beyond information provision. Thus, our team placed the emphasis on honest two-way dialogue and the involvement of people in decisions that affect them'*. This assertion was NOT the experience of our family nor of many members of our community - leaflet drops were the main source of communication and it did not involve any meaningful person to person engagement with the Community Liaison Officers (CLO) Tom Whelan and Tom Boland. Community Engagement outlined in the Ballyfasy Wind Farm Planning Statement is framed as a tick-box exercise - the Statement highlights the appointment of CLO's but provides no evidence of design changes arising from community consultation whereby issues were raised by us and our neighbours and community consent or support was acknowledged. Community engagement is presented as a process in the planning documents and community concerns were not integrated into the decision-making process - meaningful community consultation must be based on evidence of community input into the Ballyfasy Wind Farm and Grid Connection project design. Many residents within and

outside the 2km radius received zero information from Manogate Ltd about the proposed Ballyfasy Wind Farm and Grid Connection development and only became aware of the development through conversations with neighbours in the community. Requests from members of our community and our Public Representative Natasha Newsome Drennan for a public meeting with Manogate Ltd. were declined which demonstrated a further failure to engage meaningfully with the people most effected by the proposed Ballyfasy Wind Farm and Grid Connection development. Consequently, we were not afforded the opportunity to engage in discussion, raise concerns in a collective setting and receive clear and transparent explanations regarding the Wind Farm and Grid Connection proposals. The Code of Practice for Wind Energy Development in Ireland (2012) requires that the scale of community engagement reflects the scale and impact of the proposed Wind Farm project and stresses the importance of early and transparent community engagement - this standard was clearly NOT achieved. In addition, Manogate's failure to undertake inclusive and proportionate community engagement, including consideration of the children and young people of our community, as long-term effected residents, runs contrary to the principles of proper planning and sustainable development as set out in the Planning and Development Act 2000 (as amended), whereby public participation is a core principle and requires that development proposals be assessed having regard to the interests of the wider community and the long-term sustainability of the living environment. It should also be noted that the Health Service Executive, through its Environmental Health/National Environmental Health Service role as a prescribed consultee, has consistently emphasised the importance of early and meaningful public consultation in projects with potential population and human health implications. The Environmental Impact Assessment Report for the proposed development acknowledges that the HSE considers effective community engagement to be of "utmost importance" in ensuring that potentially significant impacts, including those relating to health and wellbeing, are adequately identified and addressed. *"The Health Service Executive/National Environmental Health Service welcomes the applicant's Community Engagement Strategy and notes that early and meaningful public consultation with the local community and stakeholders is of utmost importance to ensure all potentially significant impacts are adequately addressed, and that members of the public should be given sufficient opportunities to express their views on the proposed development"*. However, the consultation undertaken for the Ballyfasy Wind Farm and Grid Connection by Manogate Ltd. did not reflect this expectation in practice, being limited to leaflet distribution with no public meetings and no demonstrable mechanism for addressing health-related concerns raised by us and our neighbours. This further demonstrates the disconnect between the HSE's stated expectations and the inadequate and insufficient public consultation and community engagement process by Manogate Ltd. Simultaneously, agreements appear to have been negotiated with Landowners quietly over several

years and this has caused serious mistrust, division and distress within our community.

- Following a Ministerial Direction Section 11.5.1 (along with other sections) of the Kilkenny City and County Development Plan 2021 – 2027, shall be taken not to have come into effect and Section 11.5.1 of the draft Development Plan has been reinstated. Section 11.5.1 of the draft plan states that it is expected that the renewable energy target will be met by a mix of renewable energies, in which solar will play a significant role, thus removing dependence on wind and reducing the number of wind turbines required significantly. The proposal fails to achieve this aim of the Development Plan and results in the proliferation of wind farms. This means that wind energy will provide more than the anticipated proportion of renewable energy, increasing the dependence on wind energy and reducing the potential for solar which the development plan states should play a significant role. The proposal therefore contravenes this section of the Development Plan.

For the reasons outlined above, We, as a family, respectfully request that An Coimisiún Pleanála refuse permission for the Ballyfasy Wind Farm 110kV Grid Connection.

Thanking you for your time.

Kind regards,

Breda, Bart, Leah and Emma Ratcliffe.