

Submission of Kathleen Moore Walsh, Rathinure, Glenmore Y34AT04

On behalf of all local people who have been silenced by the cost of this process, I want to take this opportunity to note that splitting the application, and the €50 cost for filing a submission for each application has a chilling effect on meaningful consultation. This is not in keeping with EU requirements of consultation with impacted groups. A local group has sought to mitigate this through joint submissions, but people unable to attend their meetings etc. have been completely marginalised.

There are two proposed routes proposed by the Applicant for connection to the national grid for the proposed Ballyfasy Wind Farm consisting of ten 180 m. wind turbines.

GCO One

Grid connection to the disputed Castlebanny Wind Farm substation via a 12 km long 110 kV underground cable and all related site work, horizontal directional drilling, drainage and ancillary works.

The construction of proposed GCO One will involve excavation of a trench through recorded archaeology monuments. Of particular concern is AH02 described as a Church/grave yard, mill and a redundant record. I am not familiar with that particular area, but I believe from the maps it must be in Mullinakill. Many families in this rural section of County Kilkenny can trace their families back to the beginning of local parish records ie mid 17th century. We know our ancestors are buried in the small burial areas usually in the enclosures of early churches now in ruins. These burial areas remained in use long after the churches became ruins. For example, Kilcolumb ruins and cemetery had its last burial in the 1980's. It is unacceptable to trench through any known grave yard/burial area particularly as most of the early family graves are not marked.

Secondly, the grid connection options study was limited to 50 m in areas where there are dozens of known protected monuments. A number of these protected monuments are made of earth and easily damaged. Given the size of equipment, the size of the project itself I question whether a 50 m study is sufficient to protect our archaeological heritage. I also query whether the laid cable will impact on work to preserve or record discovered archaeology near the proposed cable.

Thirdly, the Applicant's Report also states that GCO One passes through c. 2.5 km of previously undisturbed greenfield. Ground disturbances associated with digging the trench has the potential to result in direct and negative (permanent) effects on any unknown archaeological remains. It seems to me that given the known protected monuments in this area that it is likely that the trenching will uncover and damage unknown archaeology.

To meet the EU, National and Kilkenny goals of preserving and protecting archaeology GCO One should be rejected.

Impact on Cultural Heritage

The Applicant's conclusion and submission regarding the impact on cultural heritage is deficient. Cultural heritage applies to aspects of the landscape such as historical events, folklore memories and cultural association. The Applicant only refers to the significant local archaeology. It fails to address, or even attempt to address, local historical events or folklore notwithstanding the fact that some of the folklore was recorded by Dúchas.ie School Collection (Ballyfacey National School, roll no. 9880 (1937); Mullinavat Convent, vol. 0851,

p. 4; Tullogher School, roll no. 14648) and Glenmore historian Danny Dowling (1927-2021). In addition to several publications and books, Danny Dowling founded in 2019 glenmore-history.com. that makes his work accessible.

In the early 1980's Danny Dowling appeared on a Canadian television series called "Land & Sea," which featured Mullinakill and its Pattern and Holy Well. The tape is now available on YouTube <https://www.youtube.com/watch?v=c5-CPgrebco> . It depicts the importance of the area internationally. If the proposed windfarm proceeds this tape may be the last view of the tranquil countryside before it is overshadowed by the industrial wind turbines and trenched through.

Other important works such as William Canon Murphy, "The Pattern of Mullinakill," (*Old Kilkenny Review* (1970) Kilkenny Archaeology Society, p. 42) record the oral tradition of the local Saint Molaing. He was born, it is believed in Listerlin and later lived the life of a recluse in the hills of Mullinakill. Article available at <https://kilkennyarchaeologicalsociety.ie/wp-content/uploads/2021/03/OKR1970-42-William-Canon-Murphy-The-Pattern-of-Mullinakill.pdf>

Even local media in 2024 reported on the large crowds that attend the Pattern of Mullinakill, but not one mention by the Applicant and the impact on local traditions during the proposed building, maintenance or decommission of its massive industrial project. (See, <https://www.kilkennypeople.ie/news/your-community/1581690/large-crowd-expected-at-pattern-mass-at-ancient-site-in-kilkenny.html>).

I would have welcomed the opportunity to obtain information regarding this proposed grid connection option and provide my thoughts on the need to avoid protected sites. Unfortunately no public meetings were held and it is my understanding the Applicant (although apparently partially owned by State bodies) refused all requests for public meetings.

GCO TWO

GCO Two will connect the onsite substation with the existing 110 kV Great Island-Kilkenny via an overhead line which crosses 2.3 km to the east of the proposed wind farm site. A single grid connection will be constructed for the proposed project and will become a permanent component of the Irish national grid network and this rural landscape. Perhaps the most worrying aspect of the Applicant's second option is that the GCO constructed will be determined by the grid connection offer received following EirGrid/ESB post planning system studies.

Again, had there been a public meeting I could have asked what does this mean? Does it mean that pylons are going to become a permanent blight on the countryside to connect this proposed industrial system to the national grid? How tall will the pylons be? How many will there be? Why can't this option be underground or use existing connections via the other industrial generation turbines already present?

GCO Two may not cause as much impact on protected monuments and unknown archaeology, but it must by going over head include drilling, drainage and ancillary works in the construction of pylons and impact on animals including birds. Earlier this month it was reported by RTE that the ESB blamed 1500 outages on animals (See, <https://www.rte.ie/news/ireland/2026/0203/1556520-esb-outages-ireland/>). This number

obviously does not include the number of wild animals killed by pylons and the high voltage transmission wires.

The building of this proposed path or corridor may cause the fragmentation or destruction of habitats. The removal of ditches, trees, etc. may allow local plants etc. to be replaced by invasive species.

EirGrid concluded in 2015 that electrical transmission wires do not pose a significant risk to bats (See, <https://cms.eirgrid.ie/sites/default/files/publications/EirGrid-Evidence-Based-Environmental-Study-3-Bats.pdf>). However, s. 6.1 Planning, Assessment, and Construction (p. 45) provides that “Assessing individual species’ sensitivities on a local scale is important and should continue to remain a consideration at the scoping stage of Environmental Impact Assessment (EIA).” In the Application I could not find any local species identified.

Ireland has nine known species of bats which are protected under Irish and EU law. (Marnell, Kelleher & Mullen, (2022) *Bat Mitigation Guidelines for Ireland*, on Behalf of the National Parks & Wildlife Service). Thus within 5 km of the proposed site there are at least 3 species of bats present or one-third of the species found in Ireland. While the Applicants checked the proposed site for roosting spots in trees they do not appear to have considered the proposed changes on the feeding grounds and corridors of local bats. Foraging distances depend on the species with most Irish bats foraging within 2 to 10 km of their roost.

Glenmore Village is about 4 km south east from the proposed site and its Mill Race river area is a bit closer. In 2019, just before COVID hit ecologist Dr. Fiona MacGowan prepared a report for Glenmore Tidy Towns. The Village “is a beautifully situated village nestled deep into the wooded Mill Race river valley...” The Mill Race river is protected under the European Habitats Directive. “This designation means that the river and its associated habitats are of international biodiversity value for the habitats and species they host.” (Report available at <https://kilkennyheritage.ie/wp-content/uploads/2019/10/Glenmore-Biodiversity-and-nature-enhancing-measures-report.pdf>).

It seems to me that relying on EirGrid’s 2015 Report that the Applicant should have identified the various species in the area and conducted a bat survey to ensure that its proposed GCO Two does not negatively impact on existing protected bat populations. The Applicant appears to have conducted one review of the trees for bats within the turbine area. It seems apparent that to protect the local bat population the types of bats must be identified as well as their feeding and migratory patterns etc. established with respect to the proposed transmission lines.

Visual Pollution

Visual pollution refers to the unattractive and undesirable visual elements in a landscape that disrupt the aesthetic appeal of an area. Visual pollution occurs when human activities alter the visual environment in ways that are intrusive or damaging to the natural or built surroundings. (Hassan and Khalil (2024) “Visual Pollution: Causes, Health Impacts, and Mitigation Strategies for Enhancing Environmental Aesthetics and Public Well Being,” *International Journal of Multidisciplinary Research and Analysis*, available at <https://ijmra.in/v7i11/Doc/11.pdf>.)

“The loss of natural landscapes and the dominance of industrial and commercial structures in the visual environment can also reduce people’s connection to nature, leading to a sense of alienation and disconnection from the environment.” Additionally, visual pollution has been shown to impact psychological well being and mental health. Studies have shown that exposure to visually cluttered environments can lead to increased levels of stress, anxiety, and depression.

Cancer Concerns

Studies in Sweden, Germany and New Zealand have indicated a possible link with cancer while similar studies in the Norway, Canada and the USA have shown no evidence of any health risks. In 2022, a study at the University of Bristol Medical School in the UK concluded that living near high voltage electrical pylons substantially increases the risks of contracting cancer. (See CORDIS EU <https://cordis.europa.eu/article/id/15541-research-breakthrough-on-health-effects-of-pylons>).

The Applicant wrote at length about the benefits of its proposed project to local employment, but never had any public meeting to hear concerns of local residents about their health concerns. Like other rural areas we must travel for cancer treatment. Our area is assigned to Dublin, while our largest nearest hospital in Waterford City is assigned to Cork.

We already have smaller operating wind turbine installations. The cumulative impact of adding this proposed addition of ten massive turbines and the GCO proposals have not been adequately addressed. It seems to me that to reduce the negative impact of the GCO options of destroying heritage, environment and peace of mind the entire project and transmission needs to be located closer to where the electricity is needed. It is according to all reports needed in the industrial areas of Dublin.

Conclusion

Contrary to the usual argument that objectors are people who do not believe in wind or solar energy or suffer from the not in my backyard syndrome, I believe in wind and solar energy. The problem for me is where should it be placed such that it does not negatively impact on residents and the environment. Multiple nearby solar and wind installations have been proposed without my objection, but this proposed project is too big and will blight the local environment, people and heritage. Form the foregoing reasons I object to both GCO transmission proposals.

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