Save the South Leinster Way,
Castlebanny,
Ballyhale,
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,

We, the "Save the South Leinster Way" group, represent approx 80+ residents of the Castlebanny/ Glenpipe area of South Kilkenny. We 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 and this proposed functionally interdependent grid connection. This application seeks approval for two Grid Connections of which one will be implemented

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

- Grid Connection One (GCO One): underground grid connection to the so-called 'consented' although it is, in fact under Judicial Review) Castlebanny Wind Farm substation, 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. In the first instance 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 pertain to the overall project. We believe the GCO One (SID requiring a planning application) should have an EIAR & NIS specifically for this 12 km route, as this route described by the applicant follows the public road network northwards via local roads L7499, L3417, crossing the regional road L704, continuing north along the L3418 local road, travelling over and through agricultural grassland, conifer plantation,

watercourses, masonary bridges and historical monuments terminating at what is known as the Castlebanny 110kV substation. Horizontal directional drilling (HDD) would need to be implemented when installing the cable beneath watercourses. This connection requires 6 ducts in an excavated trench to accommodate 3 power cables, a fibre communications cable and a spare communications cable, an earth continuity duct, joint bays, communication chambers, and earthing link boxes. The area involved is considerable in size and the magnitude of these works potentially extreamly impactful.

2. GCO One would be constructed primarily on public roads within the jurisdiction of Kilkenny County Council, to include a section crossing privately owned lands. It is noted, on the Ballyfasy Wind Farm website, that a thorough public consultation process was undertaken. Newsletters were delivered December 2024, May 2025, September 2025 within 2 km of the wind farm site only. There was no reference to, or emphasis on the 12 km GCO One route. This GCO One is first mentioned on pg. 19 of a Project Brochure 31st October 2025. **It remains unclear if this pertinent grid connection information was distributed directly to households along the GCO One route.**
   In addition has permission been sought to access the property of householders along the said 12 km GCO One route, for laying of cables etc.? If not, issues relating to trespass become relevant. This favoured route for the grid connection proposes to pass 20 dwelling houses on its 12 km route. Surely a better alternative is to remain within the existing Ballymartin Wind Farm/Coillte lands and travel a shorter distance without passing any dwelling houses. The distance between the existing Ballymartin Wind Farm and the proposed Castlebanny wind farm is approximately 2.5 km, with the distance to the proposed substation being approximately 5 km.

3. Concerns are raised regarding Electromagnetic Interference from the underground 110kv cable which would be laid for the 12 km connection to the grid in Castlebanny. Page 15 of the Grid Connection Plan references “Health effects of Electromagnetic Fields - Report issued by the Department of Communications, Marine and Natural Resources 2007”.
   This Grid Connection Plan states that GCO One is a fully underground cable route which inherently minimises electromagnetic field (EMF) exposure. It does not, however out rule EMF exposure.

4. A Bat Assessment Report was prepared by WSP, Town Centre House, Dublin Road, Naas, Co. Kildare on behalf of Manogate Ltd (the Applicant). **There was no bat survey carried out on the GCO One grid route as part of the grid connection application.**
   A desk study was undertaken to collate publicly available information on the ecological baseline of the proposed Ballyfasy Wind Farm site and surrounding area up to a distance of 4 km.
   Field surveys were conducted within a 250m zone of influence surrounding the turbine locations and 30m surrounding all other associated infrastructure of the project.... WSP did not refer to or survey the GCO One route.
   A bat survey at Castlebanny Wind Farm (previously known as Springfield Wind Farm) Mullinavat, Co. Kilkenny was completed six years ago (2017-2020) to assess its potential for bat roosting sites and foraging sites and a report was prepared for Dr. George Smith, Blackthorn Ecology by Caroline Shiel B.Sc., Ph.D., dated March 2019. This survey commenced in January 2017 and further bat activity surveys using static detectors at the

site of the Castlebanny Wind Farm were completed in 2019 and Summer 2020. The survey was undertaken primarily within the wind farm site with much focus at turbine locations, internal forestry tracts, on the western boundary, north west and north east of the site. Of note ***Page 25 of the report refers to "haul routes for turbines to be established - these masonary bridges which will be traversed on route may need to be surveyed for bats".*** (ref. Tobin (2021) Castlebanny Windfarm Ecological Impact Assessment Report, Chapter 6 – Biodiversity) Accordingly this would also be relevant for the now proposed Grid Connection Route but was not included in the Castlebanny Wind Farm Bat survey or the Ballyfasy Wind Farm Bat Survey.

It is an offence to disturb, injure or kill bats or destroy their roosts. Within Co. Kilkenny, eight of the nine bat species of Ireland have been recorded.

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. Observation of the GCO One route reveals that there is 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.

5. An ornithology survey report specific to grid connection GCO One was not included in the planning application. The Ballyfasy Wind Farm Vantage Point Surveys (VPS) initially selected two VP locations with a third added in January 2023. These only provide coverage of the proposed turbine locations and a surrounding 500m buffer. Red listed birds (Golden Plover, Curlew, Snipe & Kestrel) and Amber listed birds (Black headed gull, Lesser black headed gull, Hen Harrier & Merlin) were recorded in this survey and though perceived to be in low numbers, this does not eliminate risk, particularly where survey coverage and spatial data collection were limited. Birds are known to fly over distances of several kilometres between breeding, foraging and roosting areas, this 12 km route for GCO One was not adequately surveyed.

6. 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.

7. Habitats and Species surveyed and reported in the EIAR have had Zones of Interest classified as predominately within the wind farm site and boundary, with many of the surveys captured within a 150 m buffer zone. Evidence of many species activity and/or presence were reported, examples including pine marten, badger, fallow deer and common frog. Though evidence of otter was not recorded within the site, there is potential that otter use connected streams and rivers that are hydrologically connected to the proposed project for foraging and commuting. The local and downstream otter population was assessed to be of International Importance.

   The limiting of these species surveys, to within the wind farm site, highlights the potential omission of appropriate habitat and species surveillance of the GCO One route.

Habitat loss is acknowledged, displacement and disturbance effects including construction noise acknowledged.
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.

8. The route of the preferred grid connection for Ballyfasy wind farm, GCO One crosses the Arrigle River or its tributaries via horizontal directional drilling (HDD) at six locations. It also runs adjacent to the Arrigle River c 1m from the Barrow-Nore SAC.
Though the NIS prepared states it will not result in adverse effects on the integrity of the SAC, either alone or in combination with other plans or projects....where proximity to designated sites occurs, appropriate mitigation measures have been incorporated to prevent potential indirect impacts, such as hydrological changes, disturbance during construction or habitat fragmentation. These potential unintended impacts such as frack-outs where drilling fluid escapes through fissures and seeps into waterways causing damage to sensitive ecosystems, this can smother aquatic life, clog fish gills and bury spawning grounds. HDD can disrupt local habitats by altering the landscape and introducing noise and vibrations.
The kingfisher's presence on the River Nore is a testament to the delicate balance of ecosystems and the proposed HDD at six locations on the River Arrigle or its tributaries can negatively impact this protected kingfisher.
As an Coimisiún Pleanála is aware the River Arrigle is part of the Barrow and Nore SAC and is respectfully submitted that the works contemplated in connection with the grid connection will have catastrophic consequences for the marine and river ecosystems of the River and SAC.

We would urge An Coimisiún Pleanála to refuse planning permission for this development.

_____

Tara Heavey
Chairperson of Save the South Leinster Way