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

Case Reference Number: VA10.323958

FORMAL OBJECTION TO THE PROPOSED DEVELOPMENT OF A 110KV GRID CONNECTION FOR BALLYFASY WIND FARM

Dear Secretary,

I am writing as a resident of Ballyfasy Upper 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 Coimisiun Pleanala 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 110kV overhead line.

My objection is based on the following fundamental grounds:

1. GCO One: Grid connection to the consented Castlebanny Wind Farm substation.

In the developers planning application, they have set out 2 options for the grid connection. The first option is running a 2.3km electrical cable from Great Island to the proposed substation here in Ballyfasy.

The electrical cable that they plan to run underground from Castlebanny to the proposed Ballyfasy Wind Farm will cause an electromagnetic interference. This cable is a risk to households living within 50m on either side of the underground cable.

From reading through the planning there is no section that includes any health reports from the HSE, or any contact made to residents who may be affected by this. However, it should be noted that the HSE has emphasised the importance of early and meaningful public consultation in projects with potential population and human health implications. Unfortunately, the project developers nor the community liaison officers did not reflect this expectation into practice, leaflet drops, no calls to homes and no public meetings. Only private meeting held over 12km away from the proposed development. Manogate very clearly emphasise on their website under section Community, 'At Manogate Ltd, we believe in speaking to the local community right from the start and continuing this engagement throughout the entire lifetime of the wind farm. We commit to carrying out the design process by placing a fundamental focus on open, honest engagement'. (<https://ballyfasywindfarm.ie/>)

It also states on their timeline section that door – to – door engagement has occurred. This is simply not true. Not one representative from Manogate has ever called to our home and we are just under 1km from Turbine 6 and we will be 450meters away from a borrow pit

they will use to blast rock to form the bases of the wind turbines. I would consider us and our home a high priority for door – to – door engagement (if it actually happened).

From reading the planning, the developers plan to excavate a trench through Mullenakill Church, the graveyard and the mill. This is very upsetting for families and for myself I have generations of family members buried there.

There was also no bat survey done on the GCO grid application. A reference to the Tobin (2021) Castlebanny Wind Farm Ecological Impact Assessment Report (Chapter 6 Biodiversity). As stated in the Wildlife Act 1976 it is strictly illegal to intentionally harm, injure, kill, or disturb bats or destroy their roosts in Ireland. There is a high possibility the development of the grid could impact the bats.

Radon levels are high in county Kilkenny which means disturbing the ground can cause the release of radon gases into the air. The electrical cable

‘Radon is a radioactive gas that comes from the decay of uranium which is present in all rocks and soils. It has no colour, taste or smell and can only be measured using special detectors. Outdoors, radon is not a problem as it quickly dilutes to harmless concentrations. However, when it enters an enclosed space, such as a house or other building, it can sometimes accumulate to unacceptably high levels.’ (<https://kilkennycoco.ie/eng/services/planning/building-control/radon/>)

Radon decays to form tiny radioactive particles that when inhaled, can result in a radiation dose which may damage cells in the lung and increase the risk of lung cancer. In Ireland about 350 cases of lung cancer are linked to radon each year.

Digging up areas to place electrical cables can cause radon to be released into the atmosphere and into peoples homes.

2. GCO Two: Proposed loop – in grid connection to existing Great Island – Kilkenny 110kV overhead line.

The running of these cables from Great Island will mean pylons will have to be erected in the area. I am very concerned adding pylons near our home as they are known to cause potential long term health risks from electromagnetic fields (EMFs), such as childhood leukaemia. There is an existing pylon not far from our home and in the planning application they plan to remove the existing pylon and replace it with 2 pylons.

The electricity generated from the wind turbines is distributed into the substation and pushed out into the grid.

The construction of a substation is another concern for us because of the environmental impact, health concerns such as the potential for fire or explosion risks especially in a

sensitive area here that is surrounded by woodland and the long term effects from electromagnetic fields, noise pollution because substations produce a constant low level frequency buzzing which can cause sleep problems, visual blight from large infrastructure and potential devaluation of our home.

Construction traffic, noise and vibration risk

Laying a 110 kV underground cable and transporting turbine components will involve intense construction traffic through Ballyfasy. The Traffic Management Plan (TMP) indicates use of local roads (L3417,L7499,L3424 etc.) through Ballyfasy to haul cable materials and turbine parts. These are narrow rural roads with limited capacity and houses (like mine) extremely close to the carriageway. Heavy construction trucks and abnormal loads rumbling by at all hours pose serious safety and structural concerns. In Waterford, a similar wind farm was refused partly due to “very serious concerns regarding the carrying capacity and safety of the local road network... to accommodate heavy construction traffic associated with the proposed development”[7]. Those same concerns apply here in Ballyfasy: our local road was not designed for high-frequency HGV movements, and such traffic brings risk of accidents, damage to road infrastructure, and blockage of emergency access for residents. Noise and vibration during the ~24-month construction phase will significantly impact our daily lives. My home being only ~10 m from the road means we will bear the full brunt of excavators digging trenches, breakers cutting through rock, and dozens of truck passes per day. The EIAR downplays these effects, but anyone who has experienced roadworks near their house knows the wall-shaking vibrations and noise can be distressing. Structural damage (cracked plaster, etc.) to nearby houses is a real possibility from sustained vibration – yet no structural surveys or precautionary measures are outlined for homes mere feet away. The human impact is even more immediate: constant noise, beeping machinery and dust make it impossible to maintain a normal home environment, especially for vulnerable family members (as discussed in the next section). Notably, since the COVID-19 pandemic there has been a shift toward working from home (WFH). Over 50% of Irish workers now operate remotely or in hybrid mode at least some of the week[8]. This means many residents (myself included) will be at home during daytime construction, trying to work or care for family. The incessant noise and vibration from road digging would directly interfere with our work and quality of life, something that might have been less of an issue a decade ago but is crucial now with widespread WFH arrangements. The TMP proposals for traffic management offer little comfort. The plan mainly focuses on haul routes and timing, but how will it protect my family in Ballyfasy? Even if trucks avoid school drop-off times, the sheer volume (potentially hundreds of truck trips for cable laying and turbine delivery) is disruptive. There is no mention of advance structural surveys of adjacent dwellings or compensation mechanisms if damage occurs. Similarly, while “all works will be planned in consultation with the Council Roads Engineer”, the lived reality for residents is sidelined[9]. In Waterford’s Coumragappul case (10 turbines), the local authority explicitly highlighted that the local roads’ inadequacy for heavy traffic was a reason for refusal[7] – the same conclusion should be drawn here in Ballyfasy, where the road alignment and proximity to homes make it an unsuitable construction corridor for a project of this scale. Another often-overlooked issue is pest control during excavation. Trenching along rural roads can displace vermin (rats, etc.)

especially if old stone walls or drains are disturbed. The application documents briefly note that a pest control plan will be in place, implying they anticipate rodents being flushed out during works. This raises alarm for homeowners: an influx of displaced rodents could infiltrate nearby houses and farms. The need for pest control itself underscores the level of ground disturbance and environmental upheaval this cable will cause. Local residents should not have to worry about rats invading their property due to a developer digging up the road. In summary, the construction phase impacts of the grid route – intense noise, vibration, traffic danger, dust, and even pest disturbances – are completely at odds with the quiet rural character of Ballyfasy and its surrounds and the reasonable expectation of residents to enjoy their homes. These impacts, concentrated in a small townland zone never meant for industrial activity, are unacceptable and warrant refusal. Should the Board consider approving, we insist on robust conditions: restricted work hours, structural monitoring of homes, vibration limits, pest control, real-time noise monitoring, and compensation/relocation offers if necessary. However, given the choice, we strongly prefer the outright avoidance of this route through our community. The negative effects are not “temporary inconveniences” – they represent a serious deterioration of living conditions and well-being for the duration of works, and likely beyond.

Thank you for considering this objection. Having listed all these objections, I want to stress that my family and I are not anti-renewable energy. There multiple wind farms in the area 5 km zone the area is already saturated in wind development. We understand Ireland’s climate goals and the need for clean power. But we also believe in ethical, community-centric planning. Renewable projects must be developed “the right way, in the right place” – a mantra often repeated by policymakers. That means rigorously avoiding harm to communities and treasured landscapes. Unfortunately, the Ballyfasy Wind Farm Grid connection, as currently designed, fails that test. It asks a small rural community to shoulder outsized burdens for a project whose gains largely bypass them. We trust that the Board will give due weight to the points raised and make a decision that upholds the long-term welfare of both the local population and the environment we cherish.

Yours Sincerely,

Matthew & Siobhan Murphy,

Ballyfasy Lower

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