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**Subject: Submission on Ballinla Wind Farm (Ref. 323579) – Concerns Regarding Noise, Health Impacts, and Compliance with Environmental Assessment Requirements**

**Opening:**

I wish to make this submission in relation to the proposed Ballinla Wind Farm (An Coimisiún Pleanála Reference 323579). This development raises serious concerns regarding the potential adverse effects on local residents' health and wellbeing, particularly in relation to noise, vibration, and shadow flicker, and whether the Environmental Impact Assessment Report adequately addresses these issues in accordance with EU and WHO health protection standards.

**Absence of a baseline health assessment**

Given the absence of any formal baseline health assessment, the undersigned community members wish to confirm that, should this application be granted, we will be undertaking an independent baseline study of the community's health. This will be carried out to establish a verifiable record of local health prior to any operation of the proposed turbines, in line with the precautionary approach recommended by the World Health Organisation (2018) *Environmental Noise Guidelines* and the Department of Health in April 2014 (letter enclosed).

**Legal Basis**

Under the **EU Environmental Impact Assessment (EIA) Directive** (Directive 2011/92/EU as amended by Directive 2014/52/EU), all projects likely to have significant effects on the environment must include an assessment of effects on **human health**.

Article 3(1) of the Directive explicitly requires that the EIA identifies, describes and assesses the direct and indirect significant effects of a project on:

“population and human health; biodiversity; land, soil, water, air and climate; material assets; cultural heritage; and the interaction between these factors.”

This means that **human health cannot be limited to simple noise or shadow flicker measurements** — it requires a **systematic Health Impact Assessment (HIA)** addressing potential physiological and psychological effects.

The **World Health Organization (WHO) Environmental Noise Guidelines for the European Region (2018)** further reinforce this, stating that decision-makers should:

“conduct health impact assessments that include environmental noise as a risk factor, whenever possible within an environmental impact assessment.”

Accordingly, any Environmental Impact Assessment Report (EIAR) for a wind energy development must:

1. Assess **impacts on human health** as required by the EIA Directive; and
2. Incorporate or be accompanied by a **Health Impact Assessment**, consistent with WHO 2018 recommendations.

Failure to include a proper HIA would therefore constitute **non-compliance with both EU and WHO guidance** on environmental assessment and health protection.

**Closing:**

We respectfully request that An Coimisiún Pleanála take full account of these health-related concerns and the absence of an appropriate baseline assessment before determining this application. The protection of public health must be a core consideration in the assessment of this and all similar developments.

Regards,

*Báire Górrain*