

Case Reference PAX91.323780

Caherguillamore
Bruff
Co. Limerick
V35 HX63

10th November 2025

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Case Reference PAX91323780

Re: 10-year planning permission for Ballinlee Wind Farm consisting of 17 no. wind turbines, a permanent 110KV substation, underground electric cabling systems between the wind farm site and connection point at existing Killonan 220/110KV substation, and ancillary development. Located in Ballincurra, Balingayrou, Ballinlee North & South, Ballinrea, Ballyreesode, Camas North & South, Carrigeen, Knockuregare, Ballybane and other townlands in County Limerick

To whom it may concern,

I write in connection with the above listed planning application at Ballincurra, Balingayrou, Ballinlee North & South, Ballinrea, Ballyreesode, Camas North & South, Carrigeen, Knockuregare, Ballybane and other townlands in County Limerick. My post code is V35 HX63, which is within the zone of influence of the proposed Ballinlee Wind Farm and its 110 kV grid connection to Killonan substation, routed along the R512 corridor near Bruff and the Lough Gur–Grange archaeological and ecological landscape.

While I fully recognise the importance of wind energy in meeting Ireland's National renewable energy targets and addressing climate change, and support renewable energy in principle, I have concerns about this proposal as it fails to comply with EU environmental law, Irish planning policy and the Limerick Development Plan 2022-2028, particularly in relation to sustainability, landscape character, heritage, community well-being and residential amenity. Essentially, I believe that this development is wholly unsuitable for this location as it fails to take proper account of the environmental, social and cultural impacts on the local area. I have set out my observations below under the following headings:

1. Personal Note
2. Lack of Adequate Public consultation
3. Relevant High Court Precedents
4. Unsuitability of location
5. Cultural, Heritage and Archaeology Implications
6. Impact on existing character of the area
7. Environmental, Health & Amenity Impacts
8. Community Impact
9. Impact on Lough Gur 'Red Line' Development Restrictions
10. Impact on Dark Sky & Night-Time environment

11. Ecology & Wildlife Impacts
 12. Sustainability & Environmental Impact of turbine lifecycle
 13. Property devaluation concerns
 14. Disruption to working from home and digital connectivity
 15. Impact on commuting and access to Limerick city
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1. Personal Note

I have lived in the Bruff–Lough Gur area for almost 60 years and enjoy the sense of peace, belonging, and connection with nature which comes from living in this quiet, rural landscape. This place — its open skies, wildlife, and heritage — is not simply where I live; it is part of who I am. The tranquility and beauty of this landscape have shaped my well-being, my creativity, and my outlook on life. It is a place where I feel restored and where neighbours still stop to talk — where community still means something real.

The proposed Ballinlee Wind Farm threatens to change all of this. The turbines would dominate the skyline, replacing the natural horizon with moving industrial structures. The constant presence of their blades and red aviation lights would destroy the sense of stillness that makes this area so special. Instead of silence and starlight, there will be mechanical noise and artificial glow.

With turbines located at just 2.7 km from my home, I fear that low-frequency noise will affect my sleep, health, and peace of mind. I work from home, and my ability to focus, think clearly, and enjoy the natural quiet is central to how I live and earn my livelihood. The loss of uninterrupted views toward Rathcannon Castle and the landscape that connects Bruff to Lough Gur would be deeply felt — not only by me but by many who value this unique rural setting.

Beyond my own life, I am concerned about the impact on wildlife — the bats, barn owls, whooper swans, and other creatures that depend on the same peace and space that we do. I regularly walk the land near my home and have seen many native species that are protected such as the red squirrel, barn owl, kingfisher, curlew etc. I am also concerned about what this project could do to our sense of community. Our area has always valued cooperation, care for the land, and respect for heritage. Large industrial projects like this risk dividing neighbours and undermining shared trust that has been built over generations.

I have also significant concerns for the Lough Gur archaeological area. This is an area that I have been involved in all of my life and is one of the most historically dense areas in Ireland. Tourists visit the area to find a sense of peace, to view the monuments and the landscape. Having wind turbines in close proximity will significantly alter the views from the Visitor Centre and walking trails. Lough Gur contributes significantly to the local economy through the influx of tourists and day trippers. With construction on the R512 there will be significant disruption to commutes to Lough Gur which will have knock on effects on the economy.

I also have significant concerns about that this wind farm is being viewed in isolation. There are currently proposals for 2 other wind farms in the locality. These must be viewed as a collective. Having a cable connecting these wind farms to Killonan sub station also means that in future there is the potential for more wind farms in the area. This will have significant implications on future planning permissions for my children and grandchildren.

I recognise the need for renewable energy and responsible development, but it must be said that progress cannot come at the cost of the people who already live in these landscapes. It

is surely as important to consider the needs, health, and quality of life of local residents as it is to consider the commercial interests of developers.

True sustainability means finding a balance between environmental goals, community well-being, and economic gain. I believe that this balance is missing here. What is being proposed is not sensitive development — it is an industrialisation of a living, breathing community space.

For me, this objection is not about opposing progress or renewable energy. It is about protecting the integrity of a landscape and a way of life that nurture both people and nature. The Ballinlee Wind Farm, as currently proposed, would take away the quiet beauty and peace that define this place and replace them with constant intrusion.

I ask that decision-makers remember that behind every map, every grid connection, and every planning file, there are people whose lives and identities are rooted here. I respectfully urge that equal consideration be given to the rights and needs of residents, who will live with the consequences long after the developers have moved on.

2. Lack of Adequate Public Consultation

The EIA Directive (2014/52/EU) and Aarhus Convention require *“early and effective public participation when all options are open.”* However, the Ballinlee consultation process was procedurally inadequate as there was:

- Limited notification to directly affected residents.
- Restricted online access to technical appendices (EIAR, ecological surveys, and grid connection studies).
- No dedicated consultation on the R512 grid connection route, despite its potential to affect sensitive habitats and protected species.
- No evidence that public or community feedback influenced the project design.

This breaches Article 6 of the EIA Directive, Articles 6–8 of the Aarhus Convention, and Section 172(1B) of the Planning and Development Act 2000.

3. Relevant High Court Precedents

Recent Irish High Court decisions confirms the absolute need for substantive environmental assessments and genuine public consultation as set out below:

a) Coolglass Wind Farm Ltd vs An Bord Pleanála (2025) IEHC1
Nagle View Turbine Aware Group vs An Bord Pleanála (2024) IEHC 603
O’Gorman vs An Bord Pleanála (2020) IEHC 397

These judgements confirm that procedural and ecological deficiencies in EIA and AA processes can render permissions unlawful and I respectfully submit that there are significant procedural deficiencies in this application.

4. Unsuitability of location

The Ballinlee / Bruff site is unsuitable for large-scale wind energy development because of its low-lying topography, flood risk, and proximity to settlement.

4.1 Low-Lying Terrain

- The proposed turbines are situated in a flat, low-lying basin (below 100m elevation) surrounded by agricultural land and drainage channels.
- Such terrain provides limited wind yield efficiency and amplifies visual and noise intrusion due to lack of screening.
- The visual prominence of turbines exceeding 170m in height would dominate the landscape, visible from Bruff, Dromin, Grange, and parts of Lough Gur.

4.2 Flood-Prone Area

- The area is within the Morningstar River catchment, identified by the OPW CFRAM Programme as subject to recurrent flooding.
- Turbine foundations, crane hardstands, and access roads will increase impermeable surface area, exacerbating local flood risk and water pollution.
- No comprehensive Flood Risk Assessment appears in the EIAR, breaching Limerick Development Plan Objective EH 03 and the EU Floods Directive (2007/60/EC).

4.3 Proximity to Settlement

- The proposed site lies within 2.5–3 km of Bruff town (population approx. 1,000, CSO Census 2022), and within 1 km of multiple rural homes.
- This proximity raises serious residential amenity and public health concerns due to noise, shadow flicker, and landscape domination.
- The development is incompatible with the settlement hierarchy and the sustainable rural housing policies of the Limerick Development Plan.

4.4 Lack of Suitable Alternatives

- The EIAR fails to demonstrate that alternative upland, sparsely populated, or less sensitive areas were considered, contrary to Article 5(1)(d) of the EIA Directive (2014/52/EU) requiring an assessment of “reasonable alternatives.”
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5. Cultural Heritage and Archaeology – Grange Stone Circle & R512 Corridor

The proposed high-voltage underground cable between Ballinlee and Killonan follows the R512, passing in proximity to:

- Grange Stone Circle (RMP LI048-052001), a National Monument;
- Associated monuments forming the Lough Gur Archaeological Complex, a heritage landscape of national significance.

Ground excavation, trenching, and heavy construction traffic along this corridor risk:

- Disturbance or destruction of subsurface archaeological remains;
- Vibration and visual setting impacts on Grange Stone Circle and related monuments;
- Degradation of visitor and landscape experience within the Lough Gur heritage zone.

This conflicts with:

- Article 3 of the EIA Directive (cultural heritage as an environmental factor);
- The National Monuments Acts 1930–2014;
- Limerick Development Plan Objective CH 01 (protect the archaeological heritage and its setting).

A full Archaeological Impact Assessment (AIA) of the cable route has not been provided.

6. Impact on the Existing Character of the Area

This development would irreversibly industrialise a culturally and historically significant rural landscape. The Limerick Landscape Character Assessment classifies the Lough Gur–Grange corridor as “High Sensitivity” and unsuitable for large-scale wind energy. It conflicts with Objective EH P3 (protecting rural character) and CH 01 (safeguarding archaeological heritage). The Ballinlee Wind Farm would cause a profound and irreversible change to the character, identity, and visual coherence of the Bruff–Ballinlee–Lough Gur landscape.

6.1 Rural Character and Sense of Place

This area is defined by small-scale farmland, hedgerows, historic townlands, and the archaeological landscape of Lough Gur — a setting that embodies the cultural continuity of rural Limerick. It is at the heart of the Golden Vale – prime dairy land which is vital to integrity of our community. The introduction of 170m-high turbines and grid infrastructure would transform this pastoral and heritage-rich environment into an industrial energy landscape, fundamentally altering its sense of place.

6.2 Landscape Sensitivity

- The Limerick Landscape Character Assessment classifies the area as “High Sensitivity”, meaning it is unsuitable for large-scale structures due to its scenic, cultural, and ecological value.
- The Wind Energy Strategy Map (9.1) identifies the Lough Gur–Grange corridor as “unsuitable for significant wind energy development.”

6.3 Visual and Cumulative Impacts

The turbines would be visible from:

- Bruff town centre and residential areas;
 - The Grange Stone Circle, a National Monument;
 - The Lough Gur Visitor Centre and walking trails;
 - R512 and R516 scenic routes.
- The cumulative visual effect would dominate the skyline, conflicting with Objective EH 01 (protect visual amenity) and CH 01 (protect the setting of heritage assets).

6.4 Cultural and Emotional Connection

Local residents and visitors experience this area as a landscape of quiet, heritage, and community memory. Replacing this with an industrial turbine array undermines the emotional

and cultural value of the landscape, eroding its traditional rural character — something explicitly protected by Policy EH P3 of the Development Plan.

7. Environmental, Health, and Amenity Impacts

7.1 Human Health

Under Article 3(1) of the EIA Directive, the assessment must consider *effects on human health*.

The applicant's EIAR lacks a dedicated Health Impact Assessment (HIA) addressing:

- Noise and low-frequency vibration: No verification of compliance with WHO Environmental Noise Guidelines (2018) (≤ 45 dB L_{den}).
- Shadow flicker: Insufficient mitigation despite modern “zero-flicker” control capability.
- Psychological and stress impacts: No evaluation of sleep disturbance, anxiety, or quality-of-life effects.
- Electromagnetic fields (EMF): No assessment of exposure from the 110 kV grid cable along the R512.

This omission conflicts with the precautionary principle (Article 191 TFEU) and national obligations under the Public Health (Ireland) Act 1878 as interpreted in modern planning practice.

7.2 Residential Amenity

Noise, flicker, and traffic effects are inconsistent with the Wind Energy Development Guidelines (2006) and Limerick Development Plan Objective EN P2. Independent verification and enforceable curtailment conditions are required.

7.3 Water Quality – Lough Gur Water Supply Scheme

The Lough Gur Water Supply Scheme serves the Bruff-Grange area. Proposed access roads and grid-connection trenching intersect its hydrological catchment. Potential impacts include

- Siltation, fuel leakage and runoff during construction
- Altered draining patterns leading to nutrient loading
- Pollution risk to abstraction points under EPA licence

This contravenes the EU Water Framework Directive (2000/60/EC), Drinking Water Directive (2020/2184/EU) and Limerick Development Plan Objectives EH01 and WS P1.

No Flood Risk Assessment, Hydrological or Water-Quality Impact Assessment appears in the EIAR.

8. Community impact

The proposed wind farm would have a material negative impact on the social fabric, cohesion, and economy of the Bruff–Ballinlee–Lough Gur community.

8.1 Social Cohesion and Well-being

- The area is a close-knit rural community with strong participation in heritage, sports, and environmental groups (e.g. Lough Gur Development Cooperative, Bruff GAA, and community council).
- The project risks dividing the community, as landowners and residents take opposing positions.
- Long-term community health and well-being are at risk due to chronic noise exposure, visual intrusion, and perceived industrialisation of a valued rural environment.

8.2 Tourism and Cultural Identity

- Bruff and Lough Gur attract heritage and eco-tourism, with visitor numbers exceeding 100,000 annually (Fáilte Ireland estimates).
- The construction of 170m turbines which will be visible from the Grange Stone Circle and Lough Gur visitor centre would undermine the area's heritage brand and visual setting, affecting local income and employment.
- The proposal conflicts with Limerick Development Plan Objective ED 06, which supports tourism based on cultural and natural heritage.

8.3 Educational and Recreational Use

- Lough Gur and Grange are used by local schools, universities, and environmental education programmes.
- Industrial-scale turbines and grid infrastructure along the R512 could deter use of the area for educational, recreational, and cultural purposes, contrary to Objective CF 01 (supporting community facilities).

8.4 Economic Impact on Residents

- Property values in nearby settlements could decline due to proximity to turbines.
- Construction traffic along the R512 will disrupt access for residents, farms, and small businesses, harming local productivity and road safety.
- There is no clear community benefit scheme or evidence of equitable local reinvestment.

8.5 Failure to Address Community Impacts in the EIAR

The EIA Directive (Article 3) explicitly requires assessment of effects on "population and human health." The Ballinlee EIAR fails to provide any Community Impact Assessment, contrary to both EU law and EPA 2022 EIA Guidelines.

9. Impact on Lough Gur "Red Line" Development Restrictions

The proposed Ballinlee Wind Farm and 110 kV connection route conflict directly with the established red-line planning restrictions surrounding Lough Gur, a zone designated for strict protection due to its unique archaeological, ecological, and hydrological importance.

9.1 Planning Context

- The Limerick Development Plan 2022–2028, Map 9.1 – Wind Energy Strategy, clearly marks the Lough Gur–Grange landscape as a red-lined "No-Go Area" for wind energy development. Whilst the turbines themselves are not located in the 'red line' area, the grid connection from Killonan to Ballinlee runs through this area.

- This designation reflects its status as a National Monument landscape, encompassing Grange Stone Circle, Lough Gur Visitor Centre, and numerous RMP-listed archaeological sites.
- Objective CH 01 seeks to *"Protect and enhance the character and setting of all archaeological sites and monuments and prohibit development that would adversely impact their visual or physical integrity."*

9.2 Encroachment and Cumulative Impact

- The proposed turbines and associated infrastructure lie immediately adjacent to, and in parts within, this red-line buffer zone.
- The R512 cable trenching for the high-voltage connection passes through lands hydrologically connected to the Lough Gur catchment, thereby contravening the protective intent of the red-line boundary.
- Cumulative landscape and visibility mapping in the EIAR fails to demonstrate that the protected visual corridors between Lough Gur, Grange, and Bruff will remain unaltered.

9.3 Breach of Development Plan Policy

The proposal conflicts with multiple statutory provisions:

- Objective EH P3: Maintain the character of rural and heritage landscapes.
- Objective NH 01: Protect designated natural sites and sensitive ecological zones.
- Objective CH 01: Safeguard archaeological and built heritage.
- Objective EH 01: Ensure that development does not adversely impact environmental quality or the setting of protected landscapes.

Furthermore, the Limerick Wind Energy Strategy explicitly notes that *"no wind energy development will be permitted within or immediately adjoining the Lough Gur archaeological landscape."*

9.4 Consequences

Approval of this project would:

- Undermine the integrity of the Lough Gur Conservation Zone;
- Create a precedent for breaching Development Plan red-line protections;
- Contradict the principle of consistency in planning policy enforcement;
- Risk EU-level non-compliance with the Environmental Impact Assessment and Habitats Directives.

9.5 Conclusion

The proposal, by encroaching upon the red-lined exclusion area around Lough Gur, directly contravenes the Limerick Development Plan 2022–2028, the Wind Energy Strategy, and national heritage protection policy.

It would erode the legal protection status of one of Ireland's most significant archaeological landscapes and set a dangerous precedent for further encroachment into conservation zones.

10. Impact on Dark Sky and Night-Time Environment

The proposed Ballinlee Wind Farm would significantly degrade the dark sky quality of the Bruff–Lough Gur–Ballinlee area, which is presently characterised by low ambient light levels and valued for night-time serenity, astronomy viewing, and heritage tourism. Indeed Lough Gur has been monitoring light levels for many years now and these are consistent with levels required for Dark Sky status.

10.1 Aviation and Turbine Lighting

- Each turbine over 150 m requires aviation safety lighting under Irish Aviation Authority (IAA) regulations.
- These red or white lights, visible for kilometres, would introduce continuous night-time illumination into an otherwise rural, dark-sky landscape.
- The cumulative glow and reflections from turbine blades would be visible from Lough Gur, Grange Stone Circle, and surrounding dwellings, permanently altering the natural night horizon.

10.2 Ecological Effects

- Artificial light at night disrupts the behaviour of nocturnal species, particularly bats, owls, and insects.
- The Lesser Horseshoe Bat (*Rhinolophus hipposideros*), a protected Annex II species, is highly sensitive to light and may abandon foraging corridors due to turbine illumination.
- These impacts breach Article 6(3) of the Habitats Directive and Objective NH 01 of the Limerick Development Plan, which seek to maintain ecological integrity.

10.3 Human and Cultural Impacts

- Residents currently experience true rural darkness — an important element of quality of life, sleep health, and cultural identity.
- Night-time lighting would diminish stargazing opportunities and impair Lough Gur's tourism offering, which includes astronomy and heritage-by-night experiences.
- Loss of dark-sky character conflicts with Objective EH 01 (protection of environmental quality) and EH P3 (preservation of rural character).

10.4 Policy Context

The European Landscape Convention (Florence, 2000) recognises the right of populations to enjoy landscapes free from intrusive artificial light. Similarly, Ireland's Climate Action Plan 2024 and the National Biodiversity Action Plan 2023–2030 highlight the need to reduce light pollution to protect biodiversity and human health.

10.5 Conclusion

No dark-sky or night-time lighting assessment has been provided in the EIAR. Without mitigation—such as shielded, motion-activated, or infrared aviation lights—the development would cause permanent light pollution, eroding the natural nightscape and rural amenity that define the Lough Gur region.

11. Ecology and Wildlife Impacts

The proposed development area supports or lies within the flight/foraging zones of EU-protected species as set out below. These are all animals that I have regularly seen in the locality

- Whooper Swan (*Cygnus cygnus*) – Annex I (Birds Directive); collision and displacement risks.
- Lesser Horseshoe Bat (*Rhinolophus hipposideros*) – Annex II (Habitats Directive); inadequate survey data.
- Otter (*Lutra lutra*) – Annex II; risk from trenching and hydrological change.
- Curlew, Lapwing, Kingfisher – Annex I birds; disturbance not assessed.

Proposed construction works will also have an impact on the trout and salmon population in the Morning Star river as these are spawning areas.

Other animals regularly seen in the locality include resident woodcock, snipe, pine martin and birds of prey. There are also overwintering lapwings and golden plover regularly seen in the area.

Failure to address these breaches Article 6(3) of the Habitats Directive. Article 4 of the Birds Directive and Objectives EH 01 and NH 01 of the Limerick Development Plan 2022 – 2028

12. Sustainability and Environmental Impact of Turbine Lifecycle

The long-term sustainability of wind energy infrastructure must be considered under EU Circular Economy policies and the Waste Framework Directive (2008/98/EC), yet the EIAR fails to address these issues.

12.1 Manufacturing and Carbon Cost

Each turbine requires:

- Hundreds of tonnes of concrete and steel (high carbon footprint in production and transport);
- Rare-earth minerals (e.g. neodymium, dysprosium) sourced from environmentally damaging mining operations, often outside the EU;
- Large-scale road construction for delivery, leading to irreversible land-use change.

These factors undermine claims of carbon neutrality during the early operational years.

12.2 Operation and Maintenance

Routine maintenance involves lubricants, hydraulic oils, and resins, creating potential for leaks and contamination if not carefully managed — none of which are discussed in the EIAR.

12.3 End-of-Life Management

Typical turbine lifespan is 20–25 years. After that:

- Blades, made of composite fibreglass, are not recyclable and often end up in landfill or exported for incineration.

- Steel and copper can be recycled, but no decommissioning plan or recycling commitment is included in the EIAR.
- Concrete foundations (up to 1,000 tonnes per turbine) are often left in situ, permanently altering soil structure and groundwater movement.

The absence of a Decommissioning and Recycling Plan breaches:

- Article 5(1)(f) of the EIA Directive (requiring description of waste and resource use);
- Section 172(1D) of the Planning and Development Act 2000;
- EU Waste Framework Directive (2008/98/EC) and Circular Economy Action Plan (2020).

12.4 Sustainable Alternatives

Alternative renewable strategies such as solar PV, community-scale energy storage, or rooftop renewables could deliver greater sustainability with lower ecological impact, in line with Ireland's Climate Action Plan 2024.

13. Property Devaluation

Numerous Irish and international studies have demonstrated that proximity to large wind turbines can result in declines in residential property values, particularly within 2–3 km of turbines, due to:

- Noise and flicker disturbance;
- Loss of landscape and heritage views;
- Perceived health and safety concerns;
- Industrialisation of a rural setting.

Independent assessments cited in prior Irish planning cases (e.g., *O'Gorman v An Bord Pleanála* [2020] IEHC 397) recognise that visual intrusion and amenity loss can constitute material damage to property value. My own home — directly affected by the loss of the Rathcannon Castle vista and exposure to turbine movement, shadow flicker, and noise — would suffer tangible devaluation.

The Planning and Development Act 2000 (Section 34) obliges authorities to consider the effect of development on neighbouring property and amenity. Failure to account for these impacts breaches both national planning policy and the precautionary principle (Article 191 TFEU).

14. Disruption to Working from Home and Digital Connectivity

Like many residents, I work from home and depend on stable internet and mobile connectivity for my livelihood. Large wind turbines and associated high-voltage infrastructure can cause signal scattering and interference, particularly where broadband or wireless connections rely on line-of-sight transmission.

Potential impacts include:

- Fluctuating broadband and mobile signal strength due to electromagnetic interference and physical obstruction of microwave or 4G/5G pathways;
- Reduced reliability of video calls and online systems, directly affecting productivity;
- Noise and vibration affecting concentration and quality of working environment.

The EIAR fails to assess these digital infrastructure impacts, despite clear obligations under Article 3(1) of the EIA Directive to consider effects on “*population and material assets*”, which include telecommunications and information technology systems.

The COVID-19 pandemic permanently shifted work patterns, and government policy now recognises remote working as a key element of rural revitalisation (see National Remote Work Strategy 2021). This proposal would undermine that policy, reducing the area’s suitability for remote work and economic resilience.

Accordingly, the development conflicts with:

- National Planning Framework (NPF) Objective 33 – support for teleworking and digital connectivity;
 - Limerick Development Plan Objective ED 01 – support for rural enterprise and home-based economic activity.
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15. Impact on Daily Commuting and Access to Limerick City

The R512 corridor, along which the proposed 110 kV grid connection will be installed, is the principal commuter route between Bruff and Limerick City. This road is heavily used by local residents for work, education, and services.

15.1 Construction Disruption

- Cable trenching and heavy machinery movements will cause lane closures, diversions, and delays on this narrow rural route.
- The R512 already experiences morning and evening congestion around Ballyneety and Holycross, and additional works would significantly extend travel times for daily commuters.
- Construction vehicles (including turbine component transport and excavation trucks) will conflict with school traffic, agricultural vehicles, and public buses, raising safety concerns.
- The EIAR provides no detailed Traffic Management Plan or Construction Phase Access Strategy, in breach of EPA EIA Guidelines (2022) requirements.

15.2 Road Safety and Structural Risks

- The R512 has limited road shoulders, tight bends, and several historic bridges (e.g. near Holycross and Ballyneety).
- Repeated passage of heavy turbine and construction vehicles risks road surface damage, erosion, and bridge strain, creating long-term maintenance burdens for Limerick City and County Council.
- Roadside dwellings and entrances will be subject to temporary obstruction and noise during works.

15.3 Cumulative Impact

- The R512 also provides access to key local facilities — Ballyneety Golf Club, Holycross Soccer Club, schools, and community services — all of which depend on unobstructed access.
- Ongoing works would compound community disruption, limit visitor traffic to local amenities, and deter tourism and local commerce.

15.4 Policy Context

The Limerick Development Plan 2022–2028 contains several relevant objectives:

- Objective TR 01: Maintain the safety and capacity of regional roads;
 - Objective CF 01: Protect community facilities and access routes;
 - Objective EN P2: Protect residential amenity from traffic noise and disruption.
- The absence of a robust Traffic Impact Assessment (TIA) breaches Article 5(1)(e) of the EIA Directive, which requires analysis of expected transport and mobility impacts.

15.5 Conclusion

Construction of the high-voltage grid connection along the R512 would cause major commuting disruption for residents of Bruff, Holycross, Ballyneety, and surrounding areas, reduce road safety, and compromise daily access to Limerick City. No mitigation measures, scheduling plans, or commuter management strategies have been proposed, rendering the EIAR incomplete and the development incompatible with proper planning and sustainable transport policy.

16. Requested Actions / Conditions

1. Comprehensive Health Impact Assessment (WHO 2018 compliant)
 2. Hydrological and Water-Quality Assessment for the Lough Gur catchment area
 3. Full Ecological Impact Assessment addressing whooper swans, bats, otters and other species; including seasonal flight-line and bat-activity surveys
 4. Route-specific Archaeological Impact Assessment for the R512 corridor
 5. Re-opening of public consultation after updated documentation
 6. Zero-shadow-flicker and strict noise limits, monitored continuously
 7. Detailed traffic management plan with reinstatement bonds and pre-construction road condition survey be agreed with Limerick City & County Council and made available for public review before any works commence
 8. Undertake an independent cumulative landscape assessment, including existing and planned wind energy developments within 20km of Ballinlee
 9. Revised cumulative EIAR chapter addressing overlapping infrastructure and grid connection effects across the wider region
 10. Full Health, Community, and Property Impact Assessments.
 11. Community Monitoring and Communication Plan ensuring residents beyond 2km are included in all mitigation updates, complaint procedures and monitoring reports for the project's lifetime.
 12. Mandate a Lifecycle Carbon and Decommissioning Plan under the EIA Directive.
 13. Refuse Permission if uncertainties remain regarding health, water, wildlife, heritage, sustainability, amenity, or property impacts in line with the precautionary principle (Article 191 TFEU) and High Court rulings
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17. Conclusion

Given the procedural deficiencies, incomplete assessments and potential for adverse health, heritage, wildlife and amenity impacts, the Ballinlee Wind Farm and its associated R512 grid connection does not, in my opinion, comply with EU, national or local planning law. I believe that it fails the tests of proper planning, sustainability, and environmental protection under EU and Irish law.

I respectfully request that An Bord Pleanála refuse permission, or defer any decision pending:

- a) full re-evaluation,
- b) full compliance with **EIA Directive, Habitats Directives, Flood Directive, Water Framework Directives, National Monuments Act, WHO health standards, Aarhus Convention and heritage protection obligations,**
- c) a robust environmental reassessment; and
- d) genuine community consultation.

Signed

Aine Barry,

Caherguillamore, Bruff, Co. Limerick, V35 HX63 on 10th November 2025

18. Key References

- EIA Directive 2011/92/EU (as amended 2014/52/EU)
- Habitats Directive 92/43/EEC & Birds Directive 2009/147/EC
- Water Framework Directive 2000/60/EC & Drinking Water Directive 2020/2184/EU
- Waste Framework Directive 2008/98/EC & Circular Economy Action Plan (2020)
- Floods Directive 2007/60/EC
- Aarhus Convention (1998)
- Wind Energy Development Guidelines (2006)
- WHO Environmental Noise Guidelines (2018)
- National Monuments Acts 1930–2014
- Limerick Development Plan 2022–2028 (Objectives EN P2, EH 01, EH 03, NH 01, CH 01, EH P3, WS P1, ED 06, CF 01)
- *Coolglass Wind Farm Ltd v An Bord Pleanála [2025] IEHC 1*
- *Nagle View Turbine Aware Group v An Bord Pleanála [2024] IEHC 603*
- *O’Gorman v An Bord Pleanála [2020] IEHC 397*