

To: An Coimisiún Pleanála.
Re: Ballinlee Wind Farm
Case Number: PAX 91.323780.

14 November 2025

From: Bette Browne (Ballinlee, Bruff)
Postal Address: 15 Island View, Malahide, Co Dublin K36 CX76

INTRODUCTION

I request that you refuse the Ballinlee Wind Farm application on the following grounds:

- 1. It will turn large tracts of the Golden Vale into an arid, industrial zone**
- 2. It poses grave risks to the health and well-being of our families, the long-term consequences of which are not yet fully understood.**
- 3. It will result in the permanent destruction of irreplaceable wildlife and habitats and jeopardise the local ecosystem**
- 4. It contravenes Limerick City and County's Development Plan for tourism in the area**
- 5. It will decimate the value of homes and make them impossible to sell**
- 6. No new homes will be built which will sever the generational links, leaving the elderly isolated to live on their own**
- 7. The cumulative impact of the application in conjunction with two others in surrounding areas by the same developer will be devastating**
- 8. The alternative to consider is to have the wind turbines sited offshore, not onshore**

1

DESCRIPTION OF SITE AREA

The area where it is proposed to site this industrial-scale wind farm is in the heart of the Golden Vale, the best land in the country for feeding dairy cattle and raising fast horses. It is composed of a unique, unbroken settlement pattern in field usage going back hundreds of years to the 17th century.

This turbine development will rob the soil of essential nutrients and turn this agricultural environment into an arid, industrial zone.

It will hollow out the heart of our community and transform hundreds of acres of the Golden Vale into an industrial money-spinner, while our families will be left to suffer health risks, declining home values and an environmental death trap for our precious wildlife and biodiversity.

The scale of the industrialisation can be gauged from the fact that construction alone will go on for over two years to site 17 towering turbines for at least 35 years. It will impact, directly or indirectly, no fewer than 39 townlands in Limerick, with huge HGVs making thousands of journeys through the narrow streets of our towns and villages.

There will be blasting at wind turbine locations where bedrock is present and concrete foundations will be laid across hundreds of pristine acres.

Trees, so crucial to our environment and climate, will be felled and removed forever and hedges and vegetation that sustain our wildlife will also be permanently destroyed.

Met mast construction will include vegetation removal, topsoil stripping, drainage, excavation, dewatering, grading, bedding & compaction, shuttering, placing reinforcement, pouring concrete, met mast structure, crane erection, cable ducts, electrical components, compound fencing. The list is endless.

This is the industrialisation of our environment on a grand scale. The planning proposal refers to the core site as Ballinlee, relying only on ordinance maps. But to those of us who were born and raised there we knew it as Ballinlee Valley, with very little wind, surrounded by the hills of Dromin and Rathcannon, the Ballyhouras, the mighty Galtees and Knockfierna.

These flat limestone lands, together with the corcass marsh lands, stretching from the Morning Star and Maigue rivers to the city of Limerick, have remained fertile and unchanging across the generations.

It is a land of magical landscapes, steeped in history and legend, from Dromin, the ancient meeting place of the High Kings, to Knockainey, the hill of the goddess Áine, to Athlacca, the site of a bloody battle in 1691 between the Irish supporters of James II and the troops of William III. It is dotted with antiquities like forts, ancient burial mounds and fulacht fiadh.

But now, not only have the names of Ballinlee, Ballinrea and Ballingerour been co-opted for this industrial development, the landscape and its flora and fauna will also be purloined if the application is granted. Hedges and soils will be removed, turning this area and the lush lands of Dromin and Athlacca into a sterile zone.

Wild roses, woodbine, primroses, cowslips and other flora will vanish with the hedgerows, along with wildlife and wild berries. Birdsong will be stilled and the landscape silenced.

How can public hedgerows, the breeding place for bird life and plant life, be chopped like deadwood simply to facilitate turbine development? Such destruction of this ancient landscape constitutes an offence against nature, our environment and rational planning and should be rejected.

Ballinlee has been a favourite local environmental amenity for generations. It was a walkway for many in Bruff because once they left the town and turned back at Ballinlee cross, it was calm. One would regularly meet the walkers, including the boarders and nuns from the convent. Asked why they chose Ballinlee for their walks, one of the nuns replied, simply: "Ballinlee is beautiful." It was and it is. But now this quiet, walkway may never be quite the same again.

Today, this rural oasis has become a thriving community, with beautiful well-maintained homes and safe places for children to play and grow up. It is a favourite place for people around the county to set up home, as evidenced from the fact that the number of homes in Ballinlee alone has increased from 9 in the 1970s to 25 today.

But this industrial-scale turbine development will threaten all of that. At 160 metres, these turbines will be 30 metres taller than the Dublin Spire and twice the height of the spire of Limerick's St John's Cathedral. Such turbines in height and density are the antithesis of everything that characterises this landscape and siting them there will irrevocably change this invaluable rural amenity.

Homes will no longer be built near these giant turbines. Soon, families will move away if they can sell their houses. No more will we see the continuity of generations living on these lands, for who would opt to live among towering turbines?

The answer is unavoidable. "I wouldn't like a wind farm turbine near my home," Minister Niall Collins frankly told our community at a meeting in August. The veracity of the statement chilled the room, affirming the reality of our fears and prefiguring the inevitable decline of our environment and our community.

Who indeed would want to live with a 525 ft turbine in sight of their kitchen or towering up from fields beyond. Not a few turbines, but 17 densely set across the area with blades almost the length of a GAA pitch. Make no mistake, if such a development gets the go-ahead it will hollow out the heart and ancient character of this thriving rural, residential environment.

In our generation, we have a responsibility to our families and to future generations to safeguard this environment from the destructive industrialisation posed by this application.

The Heritage Council says this is the "shared responsibility" of communities and planners. *"The principles of shared ownership and shared responsibility for our landscape should be reflected in planning legislation which is both inclusive and participatory,"* the Council states.

"The Irish landscape is a living compendium of human and natural history, its character a testament to the lives and aspirations of countless generations. It has been our inspiration and is an essential part of our identity. The landscape sustains us in every way possible — it is both our inheritance and our gift to the future"

"The Heritage Council espouses the principle of shared stewardship of our natural and cultural heritage. Our experience has been that, equipped with reliable knowledge and support, local communities are more than capable of critiquing what they have around them and imagining, describing and delivering better futures for themselves and their children."

"Their efforts and their vision deserve to be enshrined in local and regional planning. The case studies that we have sponsored, facilitated and partnered prove that this approach works and delivers quality communal landscapes that generate sustainable employment, social capital, community identity and functioning ecologies."

This application may be appropriate as part of a multi-billion industry but it is not appropriate in the heart of this thriving community, which has its own sustainable development plans built around agriculture and tourism.

This application should be rejected because it will shatter the environmental integrity of Bruff, Dromin, Athlacca, Ballinlee and the surrounding jewel of Lough Gur.

LOUGH GUR & BRUFF: Lough Gur is an historical, archaeological and cultural treasure and, in economic terms, it is the engine for tourism in Limerick, particularly for Bruff and the Ballyhoura region.

It is uniquely important nationally and internationally as the only place in Ireland with evidence of continuous human habitation going back 6,000 years. Some of its artifacts are exhibited not alone in the National Museum of Ireland in Dublin but also in New York's Metropolitan Museum on Fifth Avenue.

It is also home to the oldest and largest stone circle in Ireland. Grange Stone Circle was built over 4,000 years ago before the pyramids of Giza.



Lough Gur uniquely holds within its landscape the history and artifacts of each of the different ages of habitation in Ireland, from the Stone Age (Grange Stone Circle), Iron Age (Ring Barrows), early Christian period (Stone Forts), Medieval (Black Castle), post-Medieval (New Church, Teampall Nua). Its wildlife and biodiversity are unparalleled.

It has become a magnet for national and international visitors. But for those in our community, especially our elderly, who have enjoyed it over many decades it is the place they carry in what Yeats called their "deep heart's core."

Lough Gur should not be threatened, directly or indirectly, by industrial turbines anywhere near its pristine environment and its archaeological and biodiverse legacies.

It has remained like an anchor to nature and a bridge to the ancient world for thousands of years.

It is also our community's bridge to a sustainable future, built around tourism, not an industrial-scale turbine development.

The applicant's description of Lough Gur lacks any real understanding of this, merely noting: *"Lough Gur is a horseshoe lake near Bruff, located approximately 5km northwest of the Proposed Development and is part of the Wild Atlantic Gateway and Ireland's Hidden Heartlands tourism experiences."*

The applicant fails to understand the critical importance of these "tourism experiences" to the people and economies of nearby Bruff, Dromin, Athlacca and the wider Ballyhoura region and the pernicious effects this wind farm will have on the development of tourism.

**2. POPULATION AND HUMAN HEALTH
GRAVE RISKS TO HEALTH & WELL-BEING OF COMMUNITY**

I am concerned that among the applicant's team of some 16 experts, none is listed as qualified in the area of public health in examining the impact of the turbines on human health. The applicant's expert on "Population and Human Health" is an environmental scientist. Yet, the dangers posed to health is a major area of deep concern.

A Health Impact Survey by the Bruff Dromin Athlacca-Ballinlee Community Action Group identified a high-vulnerability rural population living within the proposed wind turbine impact zone.

Within this population, like in some other areas, people are at increased risk of health effects from the turbines, particularly those who have autism and sensory processing disorders, individuals with epilepsy, chronic neurological and cardiovascular disease, respiratory illness, mental-health conditions, and older adults with age-related frailty.

NOISE & SHADOW FLICKER

Sleep disturbance was widely reported, and a substantial proportion of households include shift-workers who depend on undisturbed daytime sleep. These factors collectively indicate a population with heightened sensitivity to environmental stressors such as noise, low-frequency vibration, and shadow flicker.

International public-health guidance is clear on the elevated health risks in such settings. The World Health Organization Environmental Noise Guidelines (2018) link environmental noise and disrupted sleep to cardiovascular disease, cognitive impairment, and mental-health deterioration, noting that children, older persons, and those with chronic illness are disproportionately affected.

There is also growing concern in Limerick City and County Council about noise complaints around wind farms erected in the county under 2006 guidelines, when turbines were just 50m high, whereas now they are over three times higher and far more powerful.

Five such wind farms have been investigated for noise complaints and on 24 September 2025, Limerick City and County Council unanimously passed a motion calling for all current and future wind turbine noise and shadow flicker complaints to be referred to the HSE for investigation because they said the council does not have sufficient expertise to adjudicate on matters affecting people's health.

This action came after the Council's acoustics expert stated at a meeting of the Rathkeale/Adare Municipal District on 2 September 2025 that there are no standards or best practice guidelines for assessing impacts of wind turbine noise on human health.

INFRASOUND MORE MENACING

While loud noise is a major health issue, low frequency infrasound can be even more menacing because it travels over long distances of some 15km and can penetrate the walls of people's homes. It can also affect animals like cattle and horses.

The applicant makes no mention of the most up-to-date research on infrasound by Prof Ken Mattsson, who has based his findings on 25 years of research. He has also developed SoundSim360, a scientifically validated model for sound propagation based on more than 25 years of research in mathematics, acoustics and computational simulation.

"Wind turbines emit infrasound that can travel at least 10 km from the source and has been shown to affect the human body and brain. Yet, authorities and the industry continue to ignore this, relying on A-weighted dBA scales that cannot describe low-frequency noise accurately," Prof Mattsson says.

Current models used by agencies in Denmark and Sweden, like Nord2000, underestimate real sound levels, particularly in the low-frequency and infrasound range. "They are too simplified, allowing parameters to be adjusted to fit a desired outcome. This leads to distorted environmental assessments and gives a false sense of safety."

Another expert, Portuguese Professor Mariana Alves-Pereira, says the distance that infrasound travels could be more than 15km.

A "false sense of safety" gives our community no safety assurance about infrasound and I believe an independent examination of its effects near turbines and up to 15km away should be a condition of this application.

OUTDATED GUIDELINES ENDANGER HEALTH

I believe it would further endanger the health and well-being of our families to allow this application to go ahead under the 2006 unfit-for-purpose guidelines.

Back in 2013 then Deputy Micheál Martin (now An Taoiseach) told the Dáil that the guidelines "*are hopelessly out of date,*" adding: "*the health implications are real for residents close to large-scale industrial wind turbines.*" This was borne out more recently in successful High Court cases on the issue on 8 March 2024, on 5 June 2025 and on 4 November 2025.

The fact that this project is being considered under unfit-for-purpose guidelines and without the involvement of qualified working health professional is neither safe nor prudent, and puts the health of our families at grave risk.

I am also extremely concerned about risks to health during the construction and operational phases of this development, which will continue for two years.

According to the application: "*Development works not only can pose safety risks but can give rise to potential impacts on general amenity affecting health and well-being.*" It continues: "*The proposed development is considered to have an adverse, short-term, not significant and*

localised effect on community health and well being due to the noise and dust generated during construction, operation of plant and deliveries to the site."

I request that urgent and evidential answers must be sought from the applicant on the following questions before a decision is made on this application.

URGENT ANSWERS:

- 1. Who and with what medical qualifications considered it would have "an adverse, short-term, not significant and localised effect on community health and well being."?**
- 2. Who and with what medical qualifications concluded the "adverse" effects would be "short-term? And what definition and evidence was employed to reach this conclusion?**
- 3. Who and with what medical qualification concluded the effects would be "not significant" And under what definition and evidence?**
- 4. Who and with what medical qualification concluded the effects would be localised on community health and well being."? And how was localised defined?**
- 5. Who and with what medical qualification examined the effects on well-being?**

URGENT ACTION:

- 1. A medical doctor and psychologist should be required to independently examine the implications of this project on the health and well-being of the families in our community before a decision on this application.; and**
- 2. Legally enforceable conditions to safeguard the health and well-being of families in our community should be attached to this application to protect our families in our community before a decision on this application.**

3. RESULT IN DESTRUCTION OF WILDLIFE AND HABITATS

The application fails to specify in realistic terms how the developer will protect Lough Gur's biodiversity so vital to the health and sustainability of the area and the wider region.

When it comes to environmental damage or damage to wildlife and their habitats during construction and siting of these huge turbines, generalised statements and references to vague and impractical "mitigation measures" should not be acceptable as protective measures.

Lough Gur, designated as a Wildfowl Sanctuary, has a rich diversity of water birds. They include: mute swans, whooper swans, greylag geese, pink-footed geese, moorhens, coots, ring-neck duck, grey herons, little egret. Its birds of prey include barn owls, hen harriers,

peregrines, sparrow hawks, long eared owls, a host of gulls, waders and songbirds, as well as dragonfly and numerous butterfly species.

The applicant admits that there will be "permanent habitat loss" during the extensive works in the construction of the 17 wind turbines, which will continue in the area for up to two years.

"Potential sources of direct effects" during the construction phase will include :

Permanent habitat loss and clearance of vegetation;

Removal of soil and rock for access tracks, hardstands and turbine bases;

Permanent habitat loss and clearance of hedgerows and treelines around turbines to implement 50m bat feature buffers;

Temporary habitat loss for the creation of temporary infrastructure such as construction compound, blade set-down areas and crane pads;

Permanent loss of nesting/roosting/resting places due to habitat loss and vegetation clearance;

Permanent habitat loss and vegetation removal along turbine delivery route

Excavation of trenches for cable ducting & storage of materials along grid connection route

It is not clear what birds make up what the applicant calls "**avian assemblages**" nor the impacts of the extensive habitat losses.

In relation to whooper swans, the applicant lists a "mitigation initiative" called the "The Ballinlee Whooper Swan Management Plan."

The applicant says the plan will use a combination of "**habitat manipulation and turbine positioning to minimise the potential impact of the development.**"

This, apparently, will encourage the swans to move away from their preferred feeding places to avoid being mauled in any collision with the turbines.

This "additional foraging capacity through habitat enhancement, located away from turbines and contiguous with previously favoured fields, is intended to reduce collision risk by encouraging swans to forage at a safe distance from turbines and to maintain a regular flightline and safe corridor."

The area proposed for "enhancement" at Camas South is approximately 8 hectares, borders the Morning Star River and "is coincident to the whooper swans' flightline from Lough Gur."

But the applicant does not detail how the swans will be made aware of this plan.

Perhaps there will be a few road signs for the swans, or perhaps a site notice in newspapers in Limerick and Reykjavik! The stark and very serious fact is that this "management plan" is at best fanciful and at worst nonsensical.

If this wind turbine development goes ahead, sooner or later a number of our native and visiting swans will likely be mauled to death in collision with these turbine blades. Or, as the applicant admits: "*Impacts on whooper swans from wind farms can potentially include mortality through collisions with turbine blades.*"

We know, for example, that three magnificent white-tailed eagles have been killed in less than a year by turbine blades in Donegal.

According to the National Parks and Wildlife Service, the white-tailed eagles were fatally injured by wind turbines in Killybegs and Inver between October 2024 and May 2025. Post-mortem examinations found evidence of broken bones consistent with turbine strikes.

The Department of Housing, Local Government and Heritage said in a report on the deaths that known eagle strikes cast doubt on the validity of the collision risk modelling, which predicted just 0.09 collisions per year — equivalent to one bird killed every 10.8 years. But the actual bird mortality rate may be higher than recorded, the Department said, as the deaths of untagged eagles may go unrecorded if removed by scavengers.

These deaths underscore that fact that “mitigation measures,” proposed by this applicant for swans and other species will not prevent deaths and injuries.

No “mitigation measures”, however elaborate, can hide the cruel and inescapable fact that for many of these wildlife, be they swans or barn owls or hen harriers or a host of other birds, wind turbine development will mean, sooner or later, an excruciating death for a number of them.

Birdlife International has also found that the threat to birds and bats is not only through direct collision with wind turbine blades. The low-frequency noise produced by the turbines and the effects of the machinery also pose a serious threat the birds.

URGENT ANSWERS:

Since the application admits the risk of death to swans, can the applicant indicate how many swans and other birds are expected to be killed foraging for food in Dromin and Rathcannon and the carcass during:

(a) the construction phase of the turbines and (b) the operation of the turbines

- 1. How many species of wildlife will suffer habitat loss?**
- 2. Will deaths occur because of such habitat loss?**
- 3. In what areas will the wildlife suffer habitat loss?**

4. BREACHES TOURISM OBJECTIVES IN LIMERICK DEVELOPMENT PLAN

TOURISM DEVELOPMENT

Since Lough Gur’s development as a tourist centre in the 1970s, in which Ballinlee-native Seán Browne played a key role as Shannonside Tourism manager, it has grown to become a premier tourist attraction in Limerick.

According to a Failte Ireland visitor attractions survey, Lough Gur recorded 105,000 visitors back in 2022. That compared with 100,000 visitors to King John’s Castle.

Type	2022	Category	Type of Admission	No. of months open in 2022
Adare Heritage Centre	56,064	Visitor / Heritage Centres	Free	121
Askeaton Castle	799	Historic Sites	Fee charging	n/a
Desmond Castle, Adare	2,839	Historic Sites	Fee charging	4
Desmond Hall	25,928	Historic Sites	Free	n/a
Foynes Flying Boat & Maritime Museum	19,858	Museums/Galleries	Fee charging	6
King John's Castle *	8,854	Historic Sites	Fee charging	n/a
Limerick City Gallery of Art	55,000	Museums/Galleries	Free	12
Limerick City Museum	19,545	Museums/Galleries	Fee charging	7
Lough Gur Lakeshore Park & Visitor Centre	105,000	Historic Sites	Fee charging	n/a
Old Irish Ways Museum	300	Museums/Galleries	Fee charging	12
Saint Mary's Cathedral	10,000	Historic Sites	Fee charging	12
The Hunt Museum	93,938	Museums/Galleries		

*King John's Castle was transferred to Limerick City & County Council in early 2022, so full statistics were not available that year, but in 2024 it attracted 100,000 visitors

Walk From
LOUGH GUR
TO BRUFF
ON
APRIL 2ND

Further information on www.loughgur.com
061 385186

In Association with Lough Gur Development & BOM Community Council

Celebrating the new junction upgrade works by Limerick City and County Council at Holycross. Linking the communities of Lough Gur and Bruff.

All proceeds go to the the Irish Motor Neuron Disease Association & Pieta House

As part of the Walk with Charlie Fundraising Initiative

Lough Gur and Bruff and its hinterland are interdependent in the continuing development and expansion of tourism in the area.

That fact is well underscored both in the Limerick City and County Tourism Plan 2025-2030, and in the Limerick Development Plan (2022-2028), which states: "The proximity to Lough Gur, one of Ireland's most important archaeological sites, offers further opportunities to residents

and visitors alike to enhance and build on the recreational offering of the site. New walkway and cycleway linkages along the old road from Bruff to Lough Gur will be supported in this (development) plan.”

Such tourism-centred development linking Bruff and Lough Gur is central to the plan. It states: “It is an objective of the Council to enhance the tourism potential, including the promotion of new tourism products in an environmentally sustainable manner, such as the linkages to JFK ancestry and the JFK Museum and work with relevant stakeholders to encourage new tourism development.”

In this context, Bruff has become a vibrant centre, promoting festivals in the town and cultural events with Lough Gur. Among those attending its recent Rose Fitzgerald Kennedy Autumn School was Kathleen Kennedy Townsend, former Governor of the US state of Maryland.

The Limerick Development Plan plan warns against “inappropriate development” and the need to protect the Morning Star River in Bruff as an important ecological site and as a natural wildlife corridor.

The plan states: “It is an objective of the Council to maintain and protect the lands adjoining the Morning Star River from inappropriate development in order to maintain its significance as an important ecological site, as a natural wildlife corridor, as a flood management zone and as a natural amenity area. It is an objective of the Council to facilitate the development of walkways and cycleways in co-operation with local interested parties, including the private, voluntary and public sector and support the development of linkages (with) Lough Gur.”

Siting 17 towering turbines in this area is clearly in contravention of these tourism initiatives in the development plan and would imperil the environmental and economic sustainability so crucial to this vibrant community now and in the future.

5. IT WILL DEVALUE OUR COMMUNITY’S HOMES AND CAUSE COMMUNITY DECLINE

In addition to the risks the community is being asked to take with the health and well-being of its children and elderly, and the transformation of its rural landscape into an industrial zone, it is also being asked to accept that the values of homes will decline.

A University of Galway study in 2023 found the value of homes, for which our families have worked all their life to pay mortgagees, will plunge by 14.7 per cent if they are within 1km of a turbine. Ten key studies in Europe also confirmed “significant negative reductions in house values within 2km of a turbine. It is estimated that in our community some 500 homes will be affected. There are over 149 homes within 1km and 279 homes within 1-2 km of a turbine.

In monetary terms, this means that homes near turbines valued at, say, €250,000 now could see a loss of almost €37,000. For families who have worked a lifetime to secure their homes this range could be catastrophic.

This Galway University study is also consistent with a study by the London School of Economics back in 2014 when turbines were one-third the height and far less powerful. Even then, that London School of Economics found wind farms can knock 12 per cent off the values of homes within a 2km radius and reduce home prices as far as 14km away.

Countries like Denmark have been taking this reality into account for a number of years. In Denmark, the Energy Policy Agreement 2008 and the Danish Promotion of Renewable Energy Act 2008 contain a Loss of Value scheme covering the development of onshore wind turbines in Denmark.

This gives neighbours the right to claim compensation for loss of value on their property if the loss is assessed to be at least 1 per cent of the property's value.

We cannot afford to take such financial risks for ourselves or our families' futures for an industrial project that was neither invited nor wanted by our community.

URGENT ACTION:

I request, therefore, that this Danish Loss of Value model should become a condition of planning for this project to protect the value of our families' homes.

6. IT WILL LEAD TO ISOLATION AMONG THE ELDERLY

This Danish model would give some degree of protection, especially to the elderly members of our community, who often get forgotten about and yet they are the key stakeholders, having worked all their lives to pay their mortgages in order to live with their family in a quiet, secure rural environment, surrounded by their grandchildren.

But now, as well as facing potentially exacerbated health issues like cardiovascular problems because of the direct and pathway effects of these turbines, they will face into a future of increasing isolation.

They will face the prospect of their environment decaying, the value of their homes falling and their grandchildren abandoning any plans to build homes near these turbines. They are painfully aware of the truth of Minister Collins' words: "I would not want a wind turbine near my home."

It is an inescapable fact that this development will have a generational impact. Over the years our vibrant community will wither and die. That is the future that this industrial scale development will mean for many of our elderly parents. It contravenes the tenets of the

Aarhus Convention to protect their rights to the enjoyment of their homes and environmental amenities.

We already know from the evidence of wind farms in other parts of the country that those near them who are able to sell their homes will do so and those who cannot will spend the rest of their years seeking redress in the courts. It's hardly surprising, therefore, that some have referred to them as "wind prisons."

A Dáil Éireann debate on wind farm energy on 11 November 2022 clearly stated on the record: *"the need to ensure that communities' rights are respected and upheld, and that there is balance in representing the rights of communities."*

This proposed project clearly fails to do this. It will irrevocably damage the the fabric and cohesion of our rural community. It will lead to isolation and, for some, the depression that comes with a sense of helplessness and loneliness. Knowingly allowing such a cruel fate to unfold for them is abhorrent. It is another primary reason to reject this proposed industrial development.

7. FULL CUMULATIVE IMPACT ASSESSMENT REQUIRED

In addition to this application, this applicant now has three wind farm applications for the surrounding area. These applications, lodged in September and October 2025, are for:

17 turbines in the Bruff/Dromin/Athlacca/Lough Gur area (lodged 29/09/25)

9 turbines in the nearby Bruree/Garrane area (lodged 10/09/25)

6 turbines in the Coolcappa/Rathkeale area (lodged 2/10/25)

32 turbines in total, if the applications are granted, towering to some 170 metres.

European Directive 2014/52/EU on the assessments of effects of certain public and private projects on the environment requires an assessment of: *"the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the project."*

Referencing this Directive, the applicant says *"the Proposed Development was considered in combination with other relevant plans and projects that could result in cumulative effects"* and looked at wind farm developments within 20km of the proposed project. It also noted that *"Any permitted and proposed wind farms in the area may also have cumulative effects should the construction phases overlap with the proposed development."*

But the applicant did not list or refer to its own two other proposed developments, one of which in the area of Bruree is just a few miles from the area covered in this Ballinlee application.

I believe that the consequences for our community of the Ballinlee Wind Farm application cannot be examined within a narrow silo of its own.

It requires to be examined as part of the applicant's other developments, otherwise our families will be left exposed not just to the risks from this application but the wider, cumulative risks of the combined developments.

Our community is being overwhelmed by these overlapping projects, lodged at dizzying speed by this applicant within weeks of each other, multiplying the threats our families face over the combined impact of shadow flicker, noise, infrasound, visual and environmental impacts and loss of habitats, biodiversity and wildlife.

The effects on devaluing our homes will also be multiplied by such a density of turbine developments. This cumulative impact has not been independently examined in this application. **I believe that such a cumulative impact assessment is now imperative.**

Successful businesses are essential to power Ireland's economy. But this not just a business. This is an industrial-scale, multi-million euro investment in which our community has no real stake but which requires our families to take grave risks with our health and homes and environment.

If community engagement means anything, surely the community is entitled to know far more about this business model. For example, what is the projected cost of this huge project and where is the financing coming from? I believe it is important that these questions should be addressed in the interests of our families, our future and our environment.

We already know from the evidence of wind farms in other parts of the country that those near them who are able to sell their homes will do so and those who cannot will spend the rest of their years seeking redress in the courts. It is hardly surprising then that some have referred to them as "wind prisons."

It is vital therefore that the applicant must put its plans for these three developments on the table to be comprehensively assessed for their cumulative impacts on health, well-being, noise/infrasound, home prices, the environment, biodiversity and the expansion of tourism.

As the applicant says: *"Other existing wind energy developments in proximity to the proposed Ballinlee wind farm have potential to cause cumulative noise and visual effects in combination with the proposed development."* The applicant must therefore include its own two other applications for a full and transparent assessment of their combined impacts.

URGENT ACTION:

- 1. In the absence of any investigation on the cumulative impact on health directly or as pathways to ill-health and the environmental impacts of this application in combination with two wind farms already proposed by the same applicant for the nearby Bruree and Coolcappa areas, I request that a full and comprehensive cumulative impact assessment should be required. This would cover cumulative effects on: Biodiversity, Soils and Geology, Noise and Vibration, Infrasound, Water Environment, Air Quality and Climate, Population and Human Health, Major Accidents and Disasters.**

2. **In relation to health, this full and comprehensive cumulative impact assessment should be carried out independently by an environmental health expert from the HSE's National Environmental Health Services. I make the request because failure to consider this application without investigating the cumulative impacts of the other two in proximity could gravely endanger the health and well-being of our community and our environment. In support of this request, I cite this advice from The Heritage Council: "There is a growing awareness of a need to robustly assess the cumulative effects and impacts when several proposed wind farms and their associated structures are proposed within an area as often these impacts can be trans-boundary – effects and impacts are beyond county boundaries i.e. development proposals need a case-by-case approach along with a cumulative impact approach."**

8. ALTERNATIVE

Ireland can and should be capable of meeting climate targets while also meeting our responsibilities to protect our families and our environment.

That will require transferring risks from our community to the developer: this development can and should be sited offshore even if that comes with greater costs to the developer.

In fact, siting wind farms offshore is a policy the Government is encouraging through MARA, the Maritime Area Regulatory Authority.

As recently as 26 September 2025, An Taoiseach said Ireland's focus over the next number of years will be in ramping up production of offshore wind energy: "*In Ireland, the big issue for us will be offshore wind. We have already proven the impact of renewables in terms of our onshore wind performance over the last 20 years,*" he said. "*I think the offshore wind is the next big one for us.*"

The applicant references the EU Commission document 'Guidance on the preparation of the Environmental Impact Assessment Report (2017)' that states "*an Alternative should not be ruled out simply because it would cause inconvenience or cost to the Developer. At the same time, if an Alternative is very expensive or technically or legally difficult, it would be unreasonable to consider it to be a feasible Alternative.*"

I believe it is imperative that this alternative must now be examined. The applicant's consideration of alternatives in this application confines itself only to exploring other areas for onshore wind farms. It has not looked at offshore wind farms.

I make this request because this application comes with serious risks to our community, our health, our homes, our environment.

I make this request because I believe that our rights are as important as the rights of the applicant—the right to preserve our environment, our families’ health and well-being, our homes, our precious wildlife, our economy and the future development and sustainability of our area.

Our families, who have spent a lifetime paying their mortgages, should not be required by this applicant to take such serious and far-reaching risks for this development, while watching the value of their lifetime investment in their homes plummet.

I believe that the preservation of the integrity of our environment should not be left to community groups like ours in rural Ireland to seek legal recourse to protect our families and our environment. It is, as The Heritage Council, stresses, a “shared responsibility,” and as the chair of the Bar council, Mr Seán Guerin SC, said on 4 October 2025 “better quality” decision-making by planning authorities would mean fewer judicial reviews.

Furthermore, the UN Aarhus Convention stresses our obligation to future generations and establishes that sustainable development can be achieved only through the involvement of all stakeholders. Since our families were born and live in this area in which these turbines are planned, we are the primary stakeholders.

Our families are growing up here and we want them to stay here, and the elderly members of our community must be allowed the quiet enjoyment of their hard-earned homes and the environment they have helped to create.

This inappropriate, industrial-scale application should therefore be rejected because it will forever imperil the environmental integrity and character of Ballinlee, Bruff, Dromin, Athlaca and our surrounding jewel, Lough Gur. It can and should be sited offshore even if this would cause more inconvenience or cost to the developer.

URGENT REQUEST:

Given the risks to our families and our environment, I request that the developer should be required to explore this offshore alternative through an independent and transparent examination and cost analysis.

CONCLUSION

Will ours be the last generation to savour this view from Knockfierna, the highest point in Limerick?



Mindful of the tenets of the UN Aarhus Convention cementing “*The right of every person of present and future generations to live in an environment adequate to his or her health and well-being,*” I ask An Coimisiún Pleanála to refuse this wind farm application for the reasons detailed in this submission:

- 1. Ballinlee/Dromin/Bruff/Lough Gur: turbines imperil historical landscape**
- 2. Incalculable threats to prehistoric Lough Gur, its wildlife/biodiversity/habitats**
- 3. Human health affected directly or exacerbated by Noise, Infrasound, Shadow Flicker**
- 4. Impact of falling home values & community decline on well-being & mental health**
- 5. Cruel legacy for key stakeholders—our elderly will face isolation**
- 6. Alarming impact on tourism & wider economic development of our region**
- 7. Dangerous impact of cumulative density of applicant’s three proposed wind farms across our area.**
- 8. Alternative for applicant to site offshore, freeing our community from perilous risks**

References:

- (1) (a) *List of 39 townlands: Ballincurra, Ballinlee South, Ballingayrou, Ballinrea, Knockuregare, Ballinlee North, Camas North, Carrigeen and Camas South, Ballyreesode, Ballybane, Ballynanty, Cahirguillamore, Rockbarton, Grange, Ballynagallagh, Skool, Friarstown South, Friarstown, Rockstown, Rochestown, Carriganattin, Stonepark, Ballynagarde, Ballymacgreese, Glen, Knockbrien, Ballyneety, Scart, Ballyogartha, Carrigmartin, Cahernarry (Cripps), Drombanny, Ballybrennan, Coolyhenan, Knockananty, Ballysimon Commons, Tullovin and Milltown.*
(b) *Minister's statement: 18 August 2025. Dromin Hall, Co. Limerick.*
(c) <https://www.heritagecouncil.ie/>
- (2) (a) *"Limerick council seeks HSE help over wind farms" Irish Independent 24/09/2025*
(b) *Prof Ken Mattsson Infrasound: <https://youtu.be/gpHDJPcqCOY>*
(c) https://www.academia.edu/115866188/Infrasound_and_low_frequency_noise_guidelines_antiquated_and_irrelevant_for_protecting_populations
(d) *Dáil Éireann debate - Wednesday, 19 Jun 2013*
(e) *"High Court orders total shutdown of 3 wind turbines" Journal.ie 5/6/2025.*
(f) *"Wind farm noise constituted nuisance to nearby residents " Irish Times 8/3/2024.*
(g) *Four awarded over €300k for wind farm nuisance Irish Examiner 3/11/2025*
- (3) (a) *"Three white tailed eagles killed by wind turbines in Donegal" 2/10/2025*
- (4) (a) *Limerick Development Plan 2022-2028/Limerick City and County Council Tourism Plan 2025-2030. Limerick.ie.*
- (5) (a) *Home values hit 14.7% by wind farms UniversityofGalway.ie study
Windfarms can reduce house prices up to 12%. London School of Economics 2014
Denmark, the Energy Policy Agreement 2008 and Promotion of Renewable Energy Act 2008.
Compensation Frameworks for Wind Farm Disturbance. University of Edinburgh 2013.*
- (6) (a) *Wind Energy Generation – Thursday, 11 Nov 2021 www.oireachtas.ie*
- (8) (a) *"Ireland needs more offshore wind farms"-Taoiseach. Journal.ie 26/09/202*