

Bruree Charleville Effin Wind Farm Action Group
Garrouse
Bruree
Co Limerick
V35 KC79

17th November 2025

Subject: Formal objection to Ballinlee Green Energy application: Ref. 323780

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The Bruree Charleville Effin Wind Farm Action Group would like to formally object to the proposed development by Ballinlee Green Energy Wind Farm, located in Ballincurra, Ballingayroure, Ballinlee North and South, Ballinrea, Ballyreesode, Camas North and South, Carrigeen, Knockuregare, Ballybane and other townlands in Co Limerick.

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Introduction

Bruree, Charleville, Effin (BCE) Windfarm Action Group wish to object to the proposed windfarm development by Ballinlee Green Energy (BGE). This proposed development is less than 10k from a sister company (Garrane Green Energy) proposed development in our area. While both these developments are considered Strategic Infrastructure Developments (SID), another related company Ballynisky Wind Farm has applied to Limerick City and County Council for a windfarm development in the Coolcappa area of the county. These proposals represent a total of 32 wind turbines and associated works in quite a confined area. In addition, there are also proposals from other companies for solar farm and biomass developments within a short distance.

Evidence based national/county Plan.

At the outset we confirm that we support “Green Energy”. With particular reference to Wind Farms, the absence of evidence based (on science and economics) national and local authority plans is an extremely serious and glaring deficit. These plans, based on agreed national standards need to have in-built people/community protections. This deficit feeds into and further exacerbates the inconsistent approach to such developments within and across counties. Furthermore, the lack of such plans allows private for-profit developers to cherry pick proposals, dictate the location(s), pace, and timeline of such proposals/developments. It appears, this fragmented approach is such that individual proposals can get approval without oversight of the combined negative impact they may have on residents, communities, or county.

Once a proposal gets planning permission it can be sold.

Unfair Current Process

The current process is loaded in favour of the developer. From gaining the commitment of landowners, to making an application, Ballinlee Green Energy (BGE) had an abundance of time. In addition, BGE also have the financial resources, staff, expertise, and experience, together with access to An Coimisiun Pleanala (ACP) and Limerick City and County Council (LCCC) while preparing/drafting such documentation. In stark contrast the local community without any such benefits struggle to organise and respond within weeks to an application consisting of a couple of thousand pages. BGE would be aware of this disadvantage. In addition, BGE have accumulated a bank of knowledge which should be shared with the community in a transparent and open manner.

The absence of evidence based national standards and county plans as described above puts an unfair burden on communities, as it appears to be left to communities to

prove or disprove that the submissions by developers are true & accurate. Existing statutory agencies should have a readily available reservoir of knowledge/data to check the veracity of all such applications. The adjudication of such applications against agreed standards would then be an open, clear, transparent process and promptly eliminate the submission of proposed developments that would not meet the required standards or align to the agreed national and county plan.

This deficit was recognised as far back as 2013 when Deputy Micheal Martin (Leaders Questions) stated “.....*the development of wind farms throughout the country ..is causing considerable anxiety and concern among communities.....what has happened recently has scared communities and caused large divisions in many areas for which major proposals are being prepared...*”. He pointed to the absence of transparency, consultation and a legislative framework in such developments and requested the Taoiseach “*to bring in a legislative framework to govern the development of such large industrial windfarms. It is as simple as that. The planning authorities need guidelines. Even the County development plans are ambiguous in terms of their provision in this area*” He further stated that there was “*a lack of acknowledgement of the genuine concerns of moderate people...*” He requested that the Taoiseach “*...provide a framework that at least protects the health of residents, their residential amenities and visual impact on them. That is the least residents and citizens can expect from their Government*”

In A Dail debate, 21 May 2024, Deputy Canney stated “*The problem is that we have sleep walked our way into providing wind farms all over this country to provide green energy....What is being proposed in many communities around the country is not a just transition. It is not the way to go. It is actually creating more problems that we will have inquiries about in 10 to 15 years’ time as to how we did things*”

Government inaction and a continued “*.. lack of acknowledgement of the genuine concerns of moderate people*”, forces “*moderate people*” and communities to seek protections through legal processes in Irish &/or European Courts.

Common Good

A lot has been said recently about the “common good” in relation to facilitating wind farms. However, the growing dependency on a small number of developers, (potentially providers or vendors) is not for the common good. The only ones shouldering the risk for generations to come are local people and communities.

Wind Energy

A very quick view of Maps provided in the recent Public Consultation on National Territory Mapping for Renewable Electricity shows County Limerick to be seriously out of “kilter” with the rest of the country. It appears as if approximately 70% of Limericks geographic area is designated as Tier 1 which would clearly be at odds with designations in other counties and the Sustainable Energy Authority of Ireland (SEAI) wind atlas. The area proposed for development by BGE shows low wind speeds. Secure, financial incentives for developers may mean that these low energy wind farms are beneficial for the developers, however it does not logically follow that they represent good value for the consumer. Inefficiency costs, however in this case it costs the consumer (upward pressure on price) not the developer. Inefficient wind turbines are costly, noisy turbines.

While the genuine concerns of moderate people are not being acknowledged let alone listened or responded to, the increasing demands for/of Data Centres appear to take precedence over the State’s obligations to its citizens and residents.

It is essential that Ireland as a nation maintains and controls our vital energy supply. While the absence of a national plan is a serious impediment – it can be rectified. Compounding that flaw by blindly following the “current path” of handing over the vital energy resource to potential absentee landlords would be careless in the extreme and not only not in the common good but also not in the national interest.

Shadow Flicker/Noise/Impacts

Shadow flicker is measured in terms of time on receptors i.e. homes and buildings. Shadow flicker does not affect buildings it affects people. People choose to live in rural areas by choice as it reflects their occupations and/or meets their own personal needs and lifestyles. Rural lifestyle/occupations generally means that people spend quite some time outdoors. In such circumstance the imposition of wind turbines/shadow flicker has a greater impact than mere measurement on receptors. The measurement confined to receptors does not reflect the reality of living in a rural environment and appears to be based on a false assumption that all persons are impacted equally by the presence of wind turbines.

Environmental impacts for people with sensory sensitivities can be disabling. Noise (low frequency, infrasound, fluctuating whooshing sounds) are a considerable risk for people with auditory sensitivities. Shadow Flicker can be overwhelming and disorienting. People with autism rely on stability and predictability in their environment. Moving structures are a threat to that stability and predictability. Any or all of the above

can lead to chronic distress severe anxiety, sensory overload, physical, psychological illness.

Our Rural Future

NUIG (Gillespie T. McHale P (2023) Wind Turbines and House Prices Along the West of Ireland: A Hedonic Approach, CERIS) completed a study of the effect of windfarms on house values and concluded that values dropped by approximately 15%. Separately of further concern is that potential purchasers will not even consider buying in areas where they consider properties too close to wind farms or areas for which planning applications for wind farms have been submitted.

There are concerning reports of Wind farm growing influence/interference in communities. The headline “*Wind farm company challenges planning permission for Tipperary woman’s home*” Irish Independent 11/11/2025 is worrying. Perhaps the public are not aware or have not been informed of the full impact a wind farm development will have or expect to have on individuals and communities.

Government policy: Our Rural Future represents “*a whole of government policy for the sustainable development of rural Ireland. The Governments vision is for a thriving rural Ireland which is integral to our wellbeing and development It will bring about a better quality of life for all people to ensure that no one is left behind*”

If developments such as BGE are imposed, it will ensure that many people/communities are left behind.

Cumulative Effects

The areas proposed for the three related wind farms, Ballinlee Green Energy, Ballinisky Green Energy, Garrane Green Energy are significant from a historical, amenity and tourism perspective.

People with additional needs may be increasingly denied access to the community and to such amenities due to the negative impact wind turbines may have on them.

Visitors are attracted to these areas because of the uniqueness of what they offer - not to do a tour of windfarms.

Faillte Ireland state “*International visitors to Ireland consistently rate scenery as an important reason for their trip. Therefore, as the Irish landscape is one of the primary reasons for visiting the country, it is essential that the quality, character and distinctiveness of this valuable resource is protected*”.

Furthermore, concern has been expressed that the cumulative environmental impact of multiple wind farm developments, and proposed bio-methane plant, etc, poses a significant threat to local biodiversity, including habitat fragmentation, reduced breeding success and long-term population decline.

Stakeholder and Community Engagement

A stakeholder is any person or entity that has a potential interest in the proposed project or has the potential to be impacted by it (SEAI June 2023)

Stakeholder and community engagement are essential elements in environmental developments. The following references illustrate the legal and best practice obligations of public participation in developments such as the BGE proposal.

Aarhus Convention

The introduction to the Aarhus convention inter alia states that the Convention “*links environmental rights and human rightsand establishes that sustainable development can be achieved only through the involvement of all stakeholders*”

The objective of the Aarhus Convention is set out in Article 1 “*In order to contribute to the protection of the right of every person of present and future generations to live in an environment adequate to his or her health and well-being , each party shall guarantee the rights of access to information, public participation in decision making and access to justice in environmental matters*”

UN Convention on the Rights of Persons with Disabilities (UNCRPD)

The UNCRPD affirms the rights of people with disabilities to fully participate in society and in turn places obligations on public bodies etc to ensure those rights are respected and implemented.

Public Sector Equality and Human Rights Duty

“All public bodies in Ireland have a legal responsibility to promote equality, prevent discrimination and protect human rights of their employees, customers, service users and everyone affected by their policies and plans” (ref. A Guide for Inclusive Community Engagement in Local Planning and Decision Making. Department of Rural and Community Development. Pobal, CWI and ILDN 2023). It outlines principles for community engagement including transparency, inclusiveness, respect, accountability etc.

Principles in Community Engagement

BGE refer to the Good Neighbour IWEA Best Practice Principles in Community Engagement & Community Commitment, 2013. Wind Europe (2020) refers to wind industry standards on community engagement as follows *“Support from Government and society at large, including from the local communities where we want to build wind farms is part of our licence to operate”*

The SEAls 2023 publication Effective Community and Stakeholder Engagement builds on this referring to a *“social licence to operate (SLO) i.e. when a project has the ongoing approval and social acceptance from the community and stakeholders”* and emphasises that this approval/social acceptance *“must be sought from the local community, earned and maintained throughout the lifetime of a project”*

In contrast to SEAls definition of a “stakeholder” the criteria used by BGE as distance from the windfarm/turbines is too restrictive and excludes many people impacted or potentially impacted by the project.

The value of unannounced visits sometimes referred to as “cold calling” for such major and potentially life/community changing developments is highly questionable. One of the objectives of such “cold calling” is to establish a relationship with the homeowner. An essential element for proposals such as BGEs.

A review of BGEs Sentiment Analysis raises more questions for BGE than it allows BGE draw comfort from the responses. Of the 179 households identified within 1km of the proposed site, 61 were met, approximately 34%. Of that 34%, 23% were positive, 22% negative while 55% were neutral. If the objective was to genuinely seek the views of householders and establish a relationship for such a major proposal 34% was ineffective. Almost an equal number were considered “negative” responses while 55% were deemed “neutral”.

BGE should have been aware of the optimum time to meet most people and ensure those visits were carried out at the optimum time. BGE should also examine their overall approach to community engagement and understand the communities concerns for such a major potentially life changing proposal.

BGE use “soft” terminology such as *“reaching out”* to public representatives etc. *“.....in May 2025 the project team reached out to Local Councillors. TDs and other elected officials via phone calls and emails to provide information about the project, its benefits, and the community consultation process”* However, this *“reaching out”* needs to be fully transparent. Were public representatives informed of the impacts and challenges facing communities or just the so-called benefits to the community?

In Conclusion

Wind farms should not be imposed with the “*sure we will see how it affects people*” attitude. It is too late then when the development is in place. As stated at the outset agreed national and local planning would have given a clear path forward. It would also eliminate many of the issues currently being encountered and exemplified in BGEs and many other proposals. As it is not in the national interest it is essential that we do not compound the issues by continuing on this path.

As it currently stands, BGEs application to ACP raises more questions than answers. Fundamental questions arise in respect of adherence to obligations under the Aarhus Convention, UNCRRPD etc

It appears from reading BGEs application alone that a Social License to Operate does not exist. BGE have to ask themselves did they seek and earn it and if not why not?

Thank you for reading this observation.

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