

Submission of Objection to Planning Application: Ballinlee Green Energy Wind Farm Development

To:

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From:

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Subject: Formal Objection to Proposed Construction of 17 Wind Turbines (160m height, 70m blade diameter) by Ballinlee Green Energy in the Bruff, Dromin, and Athlacca Area

I. Introduction

I wish to formally object to the proposed wind energy development by Ballinlee Green Energy, which involves the erection of **17 wind turbines**, each reaching a height of **160 metres** with a **70-metre blade diameter**, within the vicinity of **Bruff, Dromin, and Athlacca** in County Limerick.

This objection is based on four critical concerns:

1. **Health implications** associated with noise and low-frequency emissions - our 3.5 year old son is Autistic and his grandmother's house (Michelle Dempsey - V35DY95) is one of the limited options he is happy/content to be in. We have limited options of who can mind him for us if we need it. This will result in impacting the mental health of our son and us as a family if we have an even smaller circle for him to socialise in than he already has. He is already being administered Melatonin to assist in sleep onset and for when he would get to stay at his Nana's, for our well needed respite, we worry that his sleep would be impacted by the noise/low-frequency emissions.
2. **Shadow flicker** and its impact on quality of life. Again re our son who is Autistic. He was assessed for seizure activity this year and we are currently monitoring him for same. Autistic people can be more sensitive/become extremely distressed by what an average person would perceive as very low sensory input.
3. **Environmental risks**, particularly to the **Whooper Swan (Cygnus cygnus)**, a protected migratory bird species.

4. **Regulations with regards to distance from the nearest turbine to a dwelling house are vague due to lack of proper legislation.** Guidelines from 2006 and updated guidelines from 2019 are not adequate to protect our community and environment.
5. **Inadequate public consultation and transparency.** Ballinlee Green Energy have refused to meet our community as a group to discuss our concerns, despite being invited to numerous community meetings.

I. Health Implications for Residents

Multiple peer-reviewed studies and international health bodies, including the **World Health Organization (WHO)**, have raised concerns about the potential impacts of wind turbine noise, particularly low-frequency noise and infrasound, on human health.

- **Sleep disturbance, stress, and headaches** have been documented among individuals living in close proximity to large turbines.
- The proposed turbine height (160m) and scale (17 units) dramatically increase the acoustic footprint of this development.
- The **Environmental Impact Assessment (EIA)** should include a **detailed, independent health impact study**, which we believe has not been adequately conducted or shared with the public.

Given the residential nature of parts of the Bruff-Dromin-Athlacca area, this proposal poses a **serious risk to public health and wellbeing.**

II. Shadow Flicker and Visual Intrusion

Shadow flicker occurs when rotating turbine blades cast moving shadows, which can result in intense and repetitive flashing inside homes.

- This is especially problematic for individuals with **photosensitive epilepsy, autism, and mental health conditions.**
- The **WHO** recommends strict limits on flicker exposure, yet developers often base models on theoretical weather and sun patterns, not local lived experience.
- Given the proximity of the proposed turbines to homes in the area, residents are at risk of **daily flicker exposure** during certain times of the year.

This is a clear **breach of quality of life** and raises concerns under **Article 8 of the European Convention on Human Rights** (right to respect for private and family life).

III. Impact on Wildlife: Threat to the Whooper Swan Population

The **Whooper Swan** (*Cygnus cygnus*) is a migratory species protected under the **EU Birds Directive (2009/147/EC)** and listed as a **Special Protection Interest** under the **EU Natura 2000 network**.

- The Bruff-Dromin-Athlacca area is part of the migratory path and wintering grounds for Whooper Swans.
- These birds are highly sensitive to disturbance and habitat alteration. Wind turbines have been shown to:
 - Disrupt **flight paths**
 - Increase risk of **collision mortality**
 - Cause long-term **habitat displacement**
- The proposed development lies within proximity to wetlands and agricultural fields commonly used by Whooper Swans for feeding and roosting.

The failure to fully assess the impact on **protected species** could render the application in breach of **EU environmental law**, including the **Habitats and Birds Directives**.

IV. There is no proper legislation in relation to how far a turbine must be from a dwelling house. The 2006 guideline and the updated 2019 guideline are merely guidelines which means there is **NO** regulation on where these turbines can be erected.

V. Inadequate Public Consultation and Transparency

Many residents report a lack of:

- Sufficient public meetings or information sessions
- Direct communication regarding environmental and health risks
- Access to comprehensive EIA and independent assessments

This undermines the **principle of public participation in environmental decision-making**, a right enshrined in the **Aarhus Convention**.

VI. Conclusion

Given the serious concerns outlined above, I respectfully urge the planning authority to:

- **Refuse permission** for the development as currently proposed, OR
- **Demand a full independent Environmental and Health Impact Assessment**, including specific studies on:
 - Shadow flicker modelling

- Low-frequency noise effects
- Avian impact assessments (specifically Whooper Swan flight paths and habitats)

This proposed wind farm, while potentially beneficial for renewable energy targets, **must not proceed at the expense of local health, biodiversity, and environmental integrity.**

Signed:

Ciara Dempsey
16th November 2025