



Dromin Athlacca Community Childcare Ltd

T/A Star Kids

Dromin, Athlacca

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The Secretary,

An Coimisiún Pleanála,

64 Marlborough Street,

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Case reference: PAX91.323780

Dromin Athlacca Community Childcare Ltd Company number 479609

To: An Coimisiún Pleanála

Re: Case Reference PAX91.323780

Submitted by: Staff and management of Star Kids Preschool & Afterschool

Date: 17th November 2025

Re: 10-year planning permission for Ballinlee Wind Farm consisting of 17 no. wind turbines, a permanent 110kV substation and ancillary development. Located in Ballincurra, Ballingayrou, Ballinlee North & South, Ballinrea, Ballyreesode, Camas North & South, Carrigeen, Knockuregare, Ballybane and other townlands in County Limerick.

1. Introduction

We, the staff and management of Star Kids Preschool & Afterschool, wish to respectfully object to the proposed Ballinlee Wind Farm (Ref. PAX91.323780).

Our early-years service is located approximately 3km from the nearest proposed turbine. As a setting where young children spend substantial time each day, we are a sensitive receptor in planning and environmental terms.

Our Commitment to Our Community

As educators, carers, and members of this community, we want to express how deeply we value the place we live and work.

Star Kids Preschool & Afterschool is more than a service. It is part of the social fabric of Dromin, Athlacca, Bruff and the surrounding townlands. Many of us grew up here, raise our own

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children here, and are proud to contribute to the wellbeing and future of the families who trust us with their little ones every day.

Our objection is not political. It is not personal.

It is rooted in genuine care for our children, our families, and the long-term health of this community. We want our children to inherit a landscape, a community spirit, and a sense of belonging that is safe, stable, and protected. It is with the greatest respect for our neighbours, our heritage, and our shared future that we bring these concerns forward.

As early-years professionals, we have a legal and ethical duty of care under:

Child Care Act 1991

Child Care (Early Years Services) Regulations 2016

Tusla Quality and Regulatory Framework (QRF)

Safety, Health and Welfare at Work Act 2005

Aistear: the Early Childhood Curriculum Framework

Síolta: the National Quality Framework for Early Childhood Education

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These obligations require us to identify, assess and respond to any environmental risk that could affect the health, safety, wellbeing and developmental environment of the children in our care, and the staff who work with them.

Having reviewed the Environmental Impact Assessment Report (EIAR) and related planning documents on the Ballinlee Green Energy Planning website, we believe the proposal does not adequately assess or protect our preschool/afterschool environment, and we therefore object on the grounds set out below.

2. Children as a Vulnerable, Sensitive Receptor – Inadequate Assessment

Upon review of the EIAR released by the developers, the following information has been observed...

Chapter 05 – Population and Human Health recognise that the EIAR must consider human health and wellbeing and is prepared in line with the EIA Directive and EPA Guidelines (Section 5.2, pp. 5-2–5-6). It also notes that health impacts are considered via environmental pathways such as noise, air, water, and material assets (Section 5.1, pp. 5-1–5-2).

However:

The Study Area is defined mainly by Electoral Divisions and population statistics (Section 5.3.1–5.3.4, pp. 5-10–5-15).

There is no specific identification of early-years services, preschools or childcare facilities as discrete receptors.

The assessment of Human Health and Wellbeing (Section 5.3.10, p. 5-24 and Section 5.4.1.5 / 5.4.2.5, pp. 5-27–5-30) is presented at a general population level and does not include a focused analysis of children as a particularly vulnerable group, nor of early-years environments.

While the EIAR refers to “residential amenities” and “the human environment”, it does not separately consider:

Preschool/after-school facilities as sensitive institutional receptors, or the heightened vulnerability of young children to environmental change (noise, air quality, traffic hazards, construction disturbance).

This is a serious omission given the obligations set out in the EIA Directive, EPA EIAR Guidelines and the IEMA guidance on considering vulnerable sub-populations in human health assessment (cited in Section 5.2, p. 5-6).

3. Noise and Vibration – No Clear Assessment at Preschool Location

Chapter 13 – Noise and Vibration outlines applicable guidance and methodology (Section 13.2–13.4, pp. 13-3–13-33) and includes extensive modelling of noise-sensitive locations (NSLs). It also summarises general international research on health effects of wind farms (Section 13.3, pp. 13-14–13-16), including HSE and international reviews.

However:

Appendix 13C – Schedule of Noise Sensitive Locations (pp. 2–5) lists hundreds of NSL points only by ID and coordinates (NSL001, NSL002, etc.). There is no indication which, if any, correspond to schools or early-years services, and Star Kids Preschool & Afterschool is not identified by name.

The EIAR therefore does not make it clear that our specific location has been considered in noise modelling, despite being a regularly occupied childcare facility operating year-round.

The health section in the EIAR (13.3, pp. 13-14–13-16) discusses general evidence for adults living near turbines, but does not distinguish children, preschool environments, or learning settings in its assessment of health effects.

Given that the EIAR itself recognises the importance of sensitive receptors and human health, the failure to transparently identify and model the preschool as such is a major gap.

4. Construction-Phase Impacts – Traffic, Road Safety, Dust and Disturbance

The EIAR acknowledges that construction is the most intensive phase for traffic and disturbance: Chapter 16 – Material Assets: Traffic and Transportation describes the road network and haul routes (Section 16.3.1, pp. 16-2–16-6) and sets out predicted HGV volumes and routes (Section 16.4.5–16.4.7, pp. 16-14–16-16; Table 16-9 and 16-10).

Appendix 16A – Traffic Management Plan further details how traffic will be managed on local roads.

However, from our reading:

There is no specific assessment of the interaction between increased HGV traffic and preschool / school drop-off and collection times along the affected local road network.

No child-specific road safety analysis is presented in relation to our service, even though families and staff use the same roads covered by the construction haul route.

Chapter 05 – Population and Human Health acknowledge traffic, noise and air quality as issues (Table 5-2, p. 5-4), but again assesses impacts at a high, general level, rather than looking at day-to-day child and staff movements to and from early-years facilities.

For dust and air quality:

Chapter 10 – Air Quality (listed in the Environmental Volume index) sets out general assessments and mitigation for dust and emissions, but the human health chapter simply references it without any specific analysis of preschool-aged children’s heightened sensitivity or the fact that children spend prolonged periods outdoors. We as a service are outdoors every single day.

There is no commitment to site-specific air quality monitoring at or near our preschool.

As childcare providers under the Early Years Regulations and Safety, Health and Welfare at Work Act 2005, we must assess foreseeable risks from construction traffic, dust and noise to children and staff. Without clear, location-specific analysis in the EIAR, we cannot safely say these risks are fully understood or mitigated.

5. Operational Phase – Low but Unverified Effects at a Childcare Setting

At approximately 3 km (or less) from the nearest turbine, we acknowledge that operational noise and shadow flicker effects at our location are likely to be relatively low compared to properties closer to the site.

However:

The EIAR does not explicitly identify our facility in the list of Noise Sensitive Locations, nor does it show predicted operational noise levels specifically at Star Kids (Appendix 13G – Predicted Noise Levels).

The Human Health chapter (Section 5.4.2.5, p. 5-30) treats noise and shadow flicker in terms of general residential amenity, and does not address how even low-level, persistent changes in noise or skyline could affect very young children in a learning environment.

No operational phase monitoring commitment is made specifically for child-centred facilities such as preschools, despite operational monitoring being discussed in Chapter 13 (Section 13.10, p. 13-68).

Given our duty of care, the absence of clear confirmation that our setting is properly modelled as a sensitive institutional receptor is not acceptable.

6. Outdoor Learning, Landscape and Biodiversity

The EIAR includes:

Chapter 06 – Biodiversity

Chapter 12 – Landscape and Visuals

Chapter 05 – Tourism and Amenities (Section 5.3.9, pp. 5-22–5-23).

These chapters discuss ecological features, scenic receptors and amenity use, but from our review:

They do not recognise the role of the surrounding landscape and biodiversity in early-years education, despite outdoor learning being a core requirement of Aistear and Síolta, which are our national framework for curriculum and quality standards.

There is no assessment of how construction activity, altered habitats or changes to local visual character may affect the quality of children’s outdoor play and learning in nearby educational settings such as our own.

Our preschool makes regular use of the local environment for:

Nature walks,

Observing wildlife,

Sensory and exploratory play, and

Developing children's connection to their community and landscape.

These are integral components of the learning environment that we cultivate.

Any project which significantly alters that environment should, at minimum, examine impacts on outdoor educational spaces and learning outcomes, which the current EIAR does not.

7. Consultation and Community Engagement – Omission of Early-Years Services

Appendix 1C – Community Engagement Report describes the consultation process with local representatives, landowners and community members.

However, to our knowledge:

Star Kids Preschool & Afterschool was not contacted directly, nor were we invited to participate in any specific engagement targeted at childcare or school settings.

There is no section identifying early-years or school stakeholders as a distinct category within the community engagement.

Given the **Aarhus Convention** principles of early and meaningful participation in environmental decision-making, and the clear duty to consider vulnerable groups such as children, it is concerning that childcare providers were not actively included in the engagement process.

8. Duty of Care and Regulatory Compliance

As registered early-years practitioners and employees, we are bound by:

Child Care Act 1991

Child Care (Early Years Services) Regulations 2016 – including obligations around health, safety, environment and premises

Tusla's Quality and Regulatory Framework (QRF) – which requires providers to identify and manage environmental risks

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Safety, Health and Welfare at Work Act 2005 – requiring risk assessment and protection of staff

Aistear and Síolta – which emphasise safe, high-quality, child-centred learning environments, indoors and outdoors.

If permission is granted for a major infrastructure project so close to our service without a clear, site-specific assessment of impacts on our children and staff, we may be left in a position where:

Our legal duty of care conflicts with the assumptions made in the EIAR, and we cannot confidently state to parents, staff or regulators that environmental risks have been fully assessed and appropriately mitigated for our setting.

That is not a tenable situation for a service working with very young children.

9. Grounds for Objection and Request to Refuse Permission

Based on the points above, we respectfully submit that the EIAR and supporting planning documents do not adequately address:

1. The status of Star Kids Preschool & Afterschool as a sensitive receptor.

2. The heightened vulnerability of young children to environmental impacts (noise, traffic, dust, visual change).

3. The specific traffic and road safety risks relating to preschool/afterschool drop-off and collection along haul and grid connection routes (Chapter 16 & Appendix 16A).

4. The need for site-specific noise and air-quality assessment at childcare settings, and relevant monitoring commitments (Chapters 10, 13 & 16; Appendix 13C & 13G).

5. The impact on outdoor learning environments, children's wellbeing, and early-years curriculum requirements (Chapters 5, 6, 12).

6. The lack of structured consultation with early-years services as a distinct stakeholder group (Appendix 1C).

7. Our ability, as duty-bearers under Irish childcare and health and safety law, to meet our statutory obligations if such a development proceeds without child-centred assessment.

Accordingly, we request that An Coimisiún Pleanála refuse planning permission for the proposed Ballinlee Wind Farm on these grounds.

10. Conclusion

We submit this objection respectfully and in good faith, guided by our professional duty of care to the children and families we serve, and to our colleagues who work in the service every day.

We ask An Coimisiún Pleanála to give serious weight to the needs of young children as a vulnerable group and to the requirements of Irish childcare and health & safety legislation when reaching its decision.

Additional Concern: Impact of Grid Connection / No-New-Build Policies on Rural Services

We also wish to highlight a further issue arising from the grid connection proposals associated with this development. Several recent grid policies and constraints particularly those linking network capacity with restrictions on new residential connections have the potential to limit future growth in rural areas.

If the grid connection or associated policies result in a “no new builds / no new connections” scenario for the region, this could seriously affect:

-the ability of young families to build or move into the area,

-the long-term population stability of small villages, and

-the future enrolment and viability of essential rural services including our preschool and afterschool service.

Star Kids relies on local families choosing to live and settle in the community.

Any planning decision that may restrict housing or population renewal creates a very real risk to our ability to retain children, maintain staffing levels, and continue operating sustainably into the future.

This is an educational, social and economic impact that should be fully considered within any responsible assessment of cumulative effects.

For all the reasons outlined above, we the staff of Star Kids Preschool and Afterschool respectfully object to the planned proposal of 17 industrial sized turbines in our locality.

Kind Regards,

Management, Staff, and management Committee of Star Kids Preschool & Afterschool

Letitia English (Manager)

Roisin Keating (Deputy Manager)

Nicola Hennesey (Early Years Teacher)

Peter Lynch (Early Years Teacher)

Marie Mullins (Secretary)

Claire Meeney (Early Years Teacher)

Rachel McGowan (Early Years Teacher)

Management Committee

Norma Hayes – Chairperson

Karen Hopkins -Secretary

