

Mortgage,
Meanus,
Kilmallock,
Co. Limerick
V35HW82

The Secretary,
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902
Case reference: PAX91.323780

Date: 17.11.25

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, Ballingayrou, Ballinlee North & South, Ballinrea, Ballyreesode, Camas North & South, Carrigeen, Knockuregare, Ballybane and other townlands in County Limerick.

To Whom It May Concern,

I, Edel Foster, write in connection with the above listed planning application at Ballincurra, Ballingayrou, Ballinlee North & South, Ballinrea, Ballyreesode, Camas North & South, Carrigeen, Knockuregare, Ballybane and other townlands in County Limerick.

I am a resident of Meanus in the Bruff–Grange–Meanus parish and a lifelong member of this community. I am a parent of two children—one aged 17 months who I hope in time will attend Bruff preschool and primary school, and my older son, aged 19, who is currently studying Agricultural Science with the hope of pursuing farming as his lifelong career.

This development threatens the safety of our local schoolchildren, the wellbeing of vulnerable pupils, the future of farming families, and the fundamental character and amenity of our parish. It is incompatible with Irish planning policy, national health guidance, and our basic rights as residents for the following reasons in my opinion. I wish to object strongly to this proposal and ask that the Board refuse planning permission.

1. Incorrect Characterisation of the Area – A Densely Populated Parish, Not a Remote Site

The developer repeatedly presents Bruff–Athlacca–Dromin–Ballinlee as isolated rural land. This is demonstrably false.

According to the EPA EIAR Guidelines (2022), population and settlement must be assessed accurately and proportionately. The Guidelines require meaningful “baseline human environment assessment”, including settlement density, community facilities, schools, and vulnerable groups.

This parish:

- Contains a thriving National School with hundreds of pupils
- Has a high concentration of homes within 1–2km of proposed turbines
- Includes farms, sporting clubs, childcare facilities, and community infrastructure
- Has grown in population strongly across the 2016–2022 Census cycle

The EIAR fails to reflect the real density, the lived community, or the presence of a major school in close proximity.

2. Serious Safety Risks to Bruff National School – Traffic, HGVs, and Construction Impacts

The existing school bus drop-off point is already dangerous due to roadside disembarkation and limited visibility. The proposed development involves:

- abnormal loads
- heavy goods vehicles
- crane deliveries
- concrete trucks
- earthworks machinery
- borrow pit excavation traffic

The TII Construction Traffic Guidelines stress that road safety near schools must receive *maximum protection*, and any development that introduces serious conflict with children's routes must be considered a high-risk impact.

This project breaches that principle entirely.

No condition or scheduling arrangement can guarantee safety where children walk, cycle, and disembark from buses beside narrow rural roads being used by industrial traffic.

3. Impacts on Children with Additional Needs – A Protected Group Under Irish Equality Law

The school has a significant cohort of pupils with:

- autism
- sensory processing challenges
- additional educational needs
- anxiety conditions

Under the Irish Human Rights and Equality Commission Act 2014, public bodies (including planning authorities) must have due regard to eliminating discrimination and protecting vulnerable groups when assessing decisions.

Noise, vibration, shadow flicker, and visual dominance affect these children disproportionately. The WHO Noise Guidelines (2018) emphasise that children, especially those with sensory vulnerabilities, are more sensitive to environmental noise and require special protection.

The EIAR does not identify this group, does not assess their vulnerability, and does not evaluate the risk to their learning environment.

This is a contravention of the EPA EIAR Guidelines and the IHREC Public Sector Equality & Human Rights Duty.

4. Noise & Health – WHO 2018 Standards Not Met

The WHO Environmental Noise Guidelines for Europe (2018) set strong recommendations for wind turbine noise:

- ≤45 dB Lden
- Recognition that adverse health effects (sleep disturbance, annoyance, cognitive impacts) occur even at lower levels
- Children are a recognised high-sensitivity group
- Effects are stronger in rural communities, where background noise is lower

The developers EIAR attempts to frame noise levels as acceptable, but:

- It uses outdated standards
- It fails to apply WHO 2018 thresholds
- It does not meaningfully assess low-frequency noise or amplitude modulation
- It does not consider night-time sleep disturbance
- It does not evaluate cumulative noise from multiple turbines, haul roads, borrow pits, and blasting

This falls short of international best practice, and substantially underestimates risk to residents and schoolchildren.

5. Dust, Air Quality & Borrow Pit Impacts – Underestimated and Unsafe

The EIAR proposes borrow pits extremely close to homes and children’s recreational routes. Borrow pits behave like quarries, generating:

- dust plumes
- fine particulates
- vibration
- noise
- high-risk excavated voids

The EPA (2022) EIAR Guidance highlights that dust impacts must consider:

- sensitive receptors (children, elderly, people with respiratory vulnerability)
- cumulative construction sources
- real-world meteorological conditions

Dust deposition near a school environment will directly affect:

- pupils with asthma
- children with respiratory vulnerabilities
- pupils with sensory and behavioural challenges

The developer’s dust assessment is generic, not site specific, and does not use school-based receptors—even though a school is classified as one of the *most sensitive* receptor types.

6. Impact on Farming Families, Agricultural Land & Rural Heritage

My 19-year-old son is studying Agricultural Science with a genuine ambition to farm in our parish. Farming is central to our identity, heritage, and local economy.

Large-scale industrial wind farms reduce agricultural viability by:

- fragmenting farms and severing fields
- displacing livestock
- disrupting grazing patterns through noise and flicker
- increasing farm vehicle hazards on roads already narrowed by construction traffic
- creating long-term land sterilisation around turbine bases, access roads, and substations

This development contradicts the principles of:

- Ireland's Just Transition commitments
- The CAP objective of protecting family farms
- The National Planning Framework's policy on safeguarding rural economies

Industrial energy infrastructure cannot be allowed to push farming families aside or jeopardise the next generation of young farmers.

7. Cumulative Impacts – A Completely Inadequate Assessment

There are multiple wind energy proposals in this region (existing, permitted, and in-planning). The EPA EIAR Guidelines (2022) require a full cumulative assessment that considers:

- visual impacts
- noise accumulation
- traffic combined impacts
- loss of rural character
- pressure on water, soil, and biodiversity receptors
- landscape industrialisation
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The EIAR cumulative chapter is superficial, incomplete, and omits known nearby proposals, including Bruree and other regional schemes.

Given the density of population and community assets here, cumulative impact is not a minor consideration—it is *central*.

8. Human Rights, Rural Wellbeing & the Right to Peaceful Enjoyment

The development is incompatible with:

- Article 8 of the ECHR – right to private life, family life, home & wellbeing
- Irish Human Rights and Equality Commission duties
- UN Just Transition Principles – “no community left behind”

Rural communities are not disposable zones for industrial infrastructure. Our right to health, safety, landscape, heritage, and belonging must have equal weight to commercial energy interests.

9. The Area is Wholly Unsuited – Planning Permission Must Be Refused

For all reasons above, I respectfully request that An Coimisiún Pleanála refuse planning permission in full.

The development is incompatible with:

- the safety of children at Bruff National School
- the needs of pupils with additional vulnerabilities
- the well-being and viability of local farming families
- WHO noise standards
- IHREC equality obligations
- EPA's EIAR requirements
- the cumulative environmental burden on a densely populated parish
- the rights of residents to peaceful enjoyment of their homes
- the long-term sustainability of our rural community

This proposal would irreversibly damage our parish's safety, health, amenity, and identity.

10. Rural Road Safety – Traffic Displacement Will Push Drivers onto Smaller Roads

The EIAR severely underestimates the true traffic impact of this development. It assesses only construction vehicles on the *designated* haul route and ignores the well-established phenomenon of traffic displacement. When an industrial construction corridor becomes congested, drivers naturally divert to surrounding rural roads to avoid delays.

Our local roads—narrow, winding, without verges or footpaths—will inevitably become much busier not just from construction traffic, but from ordinary road users avoiding HGVs, cranes, and abnormal loads on the main route.

This creates a serious, unmitigated safety risk for:

- pedestrians
- farmers moving machinery
- school buses
- children walking or cycling
- runners and cyclists
- local residents accessing their homes

This effect is not assessed in the EIAR, which is contrary to the TII Traffic & Transport Assessment Guidelines requiring consideration of *network-wide redistribution of traffic* from major construction routes.

11. Personal Safety as a Runner and Cyclist

I am both a regular runner and cyclist in this area, precisely because our rural roads are usually quiet, predictable, and safe—unlike main regional routes which have fast-moving traffic and narrow shoulders. These local roads are part of my daily life and wellbeing.

This development will:

- increase unpredictable traffic movements
- push diverted vehicles onto minor roads
- introduce construction-related hazards

- significantly reduce safety for non-motorised users

My personal safety will be directly infringed by this project. The enjoyment of running and cycling on local roads is an important part of our rural lifestyle and community health—yet nowhere has the developer acknowledged or assessed this impact.

12. An Brú Athletic Club – Community Use of These Roads

I also run with An Brú Athletic Club, a well-established community club whose members regularly train on the rural roads surrounding the proposed development. These routes are chosen specifically because they are:

- quiet,
- safe,
- low-traffic,
- free of heavy vehicles, and
- integral to training programmes, from couch-to-5k to marathon levels.

Introducing high levels of construction traffic—and displaced traffic avoiding the main haul route—turns these roads into hostile, unsafe environments for club members. This raises issues under:

- The National Sports Policy, which encourages active participation
- Healthy Ireland
- The National Road Safety Strategy, which emphasises the protection of vulnerable road users (including runners and cyclists)
- WHO active travel health guidance, which identifies traffic exposure as a risk factor for injury and reduced community physical activity

The EIAR fails to assess the impact on non-motorised road users in any meaningful way. This is a major omission.

13. Right to Safety and Public Health

Residents have the right to safely use their local roads for walking, cycling, running, and everyday movement. This is a cornerstone of:

- The National Planning Framework’s “10-Minute Town/Village” principle, and
- Ireland’s Public Health and Wellbeing policies.

Industrialisation of our rural road network undermines not only safety, but community health and social cohesion. No community should lose safe access to their own roads because of an energy developer’s construction demands.

14. If This Proposal Is Approved, Many More Will Follow – Our Parish Will Be Surrounded

We are deeply concerned that if this development is granted permission, it will set a dangerous planning precedent that will encourage multiple further applications across the wider Bruff/Grange/Meenus area.

Already, there are:

- existing wind farms
- permitted turbines
- in-planning proposals
- and pre-application discussions happening in neighbouring townlands

The developer's own EIAR acknowledges several other wind energy zones within 20km, yet fails to assess the real cumulative and sequential effects of a clustered industrial energy zone.

If this proposal gets the green light, it is inevitable that:

- additional turbine clusters will follow
- larger and taller turbine models (up to 200m+) will be introduced
- local farmland will be further fragmented
- haul routes will be continuously reused for construction phases
- our rural parish will become encircled by industrial turbines

We will be surrounded.

This is not hypothetical — it is precisely how wind energy planning unfolds across Ireland once a foothold is established. A single permission opens the planning door for sequential, incremental expansion, turning a peaceful rural parish into an industrial energy zone over time.

This would permanently alter the landscape and community character for our children, grandchildren, and all future generations.

15. Heavy Rainfall, Flooding & Unsuitability of the Land

In recent days, sustained periods of heavy rainfall have caused extensive flooding across lands within the proposed development boundary. Large sections of agricultural fields, access paths, and low-lying areas have been fully saturated and underwater. This is not a one-off event—local residents have witnessed repeated flooding in the same areas over multiple winters.

Nature itself is demonstrating that this land is completely unsuitable for a major industrial development. Flood-prone ground cannot safely support turbine foundations, borrow pits, access roads, concrete hardstands, or cable trenching. Flooding increases risks of soil instability, erosion, sediment runoff, and contamination of local watercourses. These issues are ignored in the EIAR despite EPA requirements for climate resilience and extreme weather assessment.

This recurring flooding is a clear and visible warning sign that this development is incompatible with the natural conditions of the site.

16. Personal Impact on My Health and Wellbeing

I also want to state clearly that this proposed development has already had a negative impact on my own mental health and wellbeing. Since learning of the proposal, I have experienced significant worry, stress, and loss of sleep. The uncertainty surrounding the future of our parish, the safety of my children, and the potential long-term impacts on our home and community weigh heavily on me.

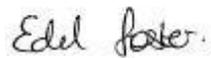
I have spent countless late nights reading through the EIA, appendices, maps, borrow pit drawings, and planning documents, trying to understand the scale of what is being proposed and the risks it poses. This process has been overwhelming and exhausting. No family should have to lose sleep simply to protect the safety of their children or the integrity of their community.

The WHO recognises stress, worry, and sleep disturbance as legitimate health impacts linked to large infrastructure and environmental noise exposure. Even before construction has begun, the burden is already being felt. This alone demonstrates how unsuitable and harmful this development is for the wellbeing of ordinary residents.

I strongly and respectfully urge that this development be rejected for the reasons outlined above.

Thank you for considering my submission.

Kind Regards,

A handwritten signature in black ink that reads "Edel Foster". The signature is written in a cursive, slightly slanted style.

Edel Foster,

References

Environmental Protection Agency (2022) Guidelines on the Information to be Contained in Environmental Impact Assessment Reports. EPA, Wexford.

World Health Organization (2018) Environmental Noise Guidelines for the European Region. WHO Regional Office for Europe, Copenhagen.

Transport Infrastructure Ireland (2014) Traffic and Transport Assessment Guidelines. TII Publications.

Irish Human Rights and Equality Commission (2014) Irish Human Rights and Equality Commission Act 2014. Government of Ireland.

Council of Europe (1950) European Convention on Human Rights. Article 8 – Right to Respect for Private and Family Life.

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Government of Ireland (2013) Healthy Ireland Framework 2013–2025. Department of Health.

Government of Ireland (2019) National Sports Policy 2018–2027. Department of Transport, Tourism and Sport.