

16th November 2025

The Secretary
An Coimisiun Pleanala
64 Marlborough Street
Dublin 1
D01 V902

Submitted by: Eric & Angela Tobin, Uregare, Bruff, Co. Limerick V35 CY98

Re: The proposed development known as Ballinlee Green Energy Limited, for 17 no. wind turbines, a permanent 110kv substation, grid connection and ancillary development. Located in Ballincurra, Ballingayrou, Ballinlee North & South, Ballinrea, Camas North & South, Carrigeen, Knockuregare and other townlands in County Limerick.

An Coimisiun Pleanala - Case Ref: PAX91.323780

Dear Sir/ Madam,

We are writing to formally object to the above referenced planning application (Case ref. 323780).

Personal introduction

Myself and my wife came to live in Bruff in 2006. We left Meadowvale, Raheen, Limerick to start a new beginning in a peaceful countryside setting. Our home V35CY98 is located in the premium townland of Uregare, 1200 metres away from Bruff town, adjacent to Knockuregare and Ballinlee North which are townlands in the proposed plan of up to 17 industrial sized turbines that are proposed to invade our peace and tranquillity that we have grown to love, live and raise our family.

We have invested our life earnings into our home, our space of tranquillity, our getaway after a busy day at work. We work hard so we as a family can enjoy the serene setting and we call it our beautiful visual getaway. We enjoy capturing the breath taking sunset behind Rathcannon Castle and love watching the wildlife in their natural habitat that surrounds us. We enjoy hearing happily singing birds including the cries of our birds of prey which fly above us. At night during our summers evening we gaze up at the stars in our interrupted dark skies and watch the bats harvest on moths, listen to the eerie call of the fox and see our resident barn owl swoosh pass. We believe this interrupted pleasure and visual amenity will be taken from us forever and will permanently be taken from our family, our future generations if these 17 industrial turbines up to 160 meters are constructed by Ballinlee Green Energy Limited.

We live off the R512, east of the southern part of the project. Eleven turbines will permanently sit 2500 metres within our home. Five of the 17 proposed turbines will permanently sit within 1360 metres (10 times the rotor diameter) from our home. The closest

proposed turbine is T15 a mere 805 metres away, T17 only 892 metres away and T14 only 987 meters away.

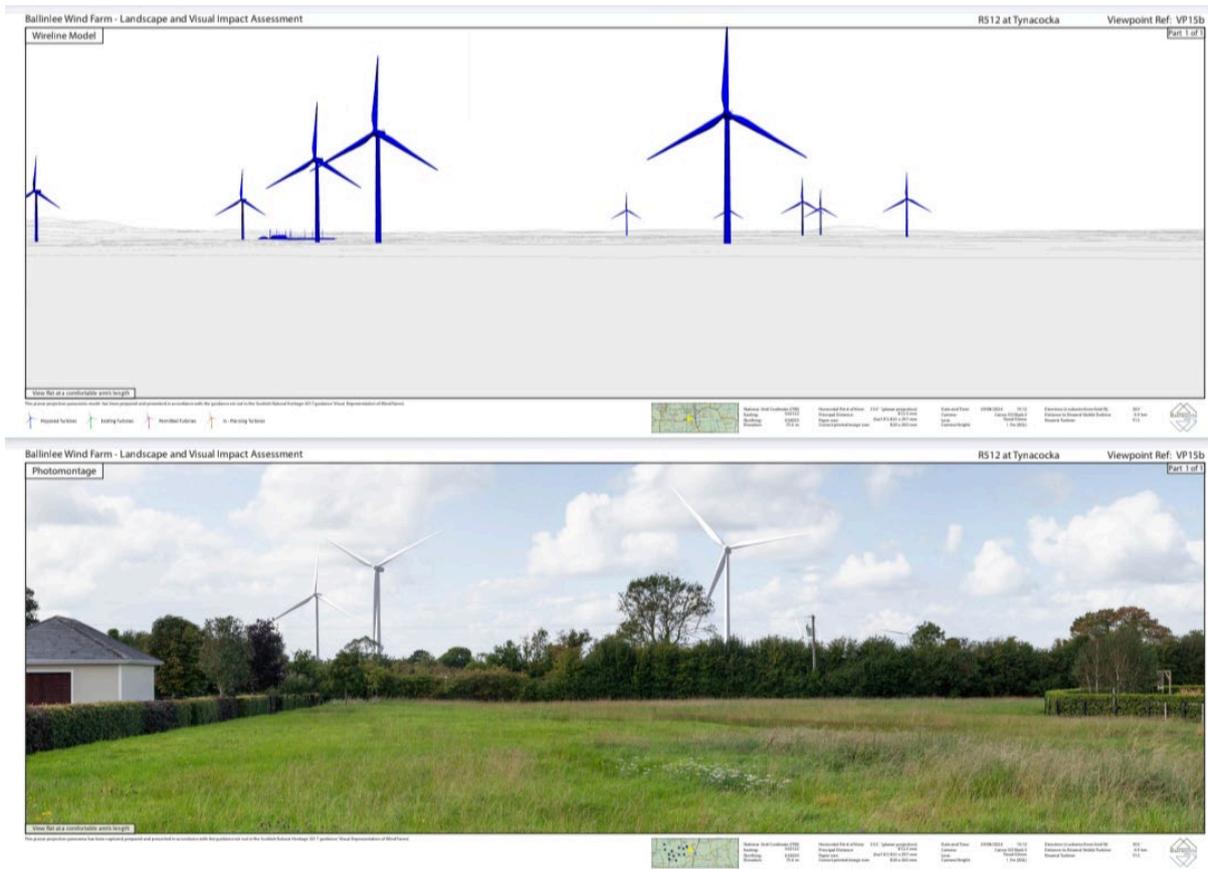
This project is total saturation, this is not protection of the natural and built environment, this is not protection of the visual and residential amenities as per objective CAF 029 “Wind Energy Development and Environmental Considerations” Limerick Development Plan 2022-2028.

The Ballinlee Wind Farm project will permanently alter the rural character of the area and expose us to health and amenity risks, property devaluation, sterilise the land. This project will cause habitat destruction, hinder wildlife including “The Whooper Swan (Cygnus Cygnus)”, destroy biodiversity and ecosystems. Our heritage and culture will be destroyed forever in the plight of pin dropping industrial turbines in this vibrant populated busy town. I strongly object to this project Case ref 323780.

We understand the need for renewable energy and we understand the need for addressing climate change, with Ireland meeting its energy targets.

We ourselves have played a vital role in helping Ireland with its targets by upgrading our home and making it more energy efficient bringing it from a BER C rating to a BER A rating by implementing Air to Water Heating and Solar PV Energy Panels in our home.

We would like to bring your attention to Vol IV Photomontages Book 2 VP Viewpoint Ref: VP15b in the planning application. See below:



My Photos and my interpretation: Please see below -

We have taken two photos from this viewing point VP15b, this is taken from my gateway land folio LK 56868 F, our home is to the right of the pictures and my neighbours garage to

the left hand side. We took this photo on October 24th 2025, vegetation is less and this picture captures a more realistic view from the R512 compared to the photo the developer took in August 2024 while there was more vegetation. The visual impact will dominate the skyline and destroy our personal amenity, the scale of this development is going to irreversibly alter the rural landscape and will be visually intrusive beside our beautiful home forever.



Viewpoint along the R512



Viewpoint along the R512

Visual Distraction -posing risk of accidents:

This viewing point will be a significant visual distraction for road users, their attention drawn and diverted from the R512 road.

Just 800 metres from this viewing point along the R512 in the direction of Kilmallock town is Uregare Cross where the R512 joins local road L1550, this location is well known for many accidents ,(records can be got from Limerick City & County Council and Limerick (Fire brigade) a speed camera van locates itself at this cross observing drivers speeding along the R512.The visual distraction from this location (beside house number 169 in the developers plans) will significantly exacerbate traffic accidents, this dangerous cross with its slight elevation looking down towards the valley of 17 turbines with T17 only a mere 900 metres away will be a catastrophic visual distraction.

The Visual impact is inconsistent with landscape Policy Objectives in the County Development Plan, including, Objective EH 022 and Objective EH023.

Our Amenity Our Health

The Proposed Wind Farm poses unacceptable risk to our health, safety and wellbeing. We are going to be significantly impacted by all elements of this development from the construction stage that's going to bring congested traffic with large volumes of HGVs hourly throughout the proposed 12 hour working day. Excavation noise and blasting noise will create significant sleep disturbance for me and the excavation will cause excessive dust pollution into the air.

As mentioned earlier we live in a tranquil area east of the southern project where 12 turbines are proposed.

WEDG 2006 say 7 x rotor diameter (RD) in prevailing wind and 3 x rotor diameter (RD) in crosswind between turbines. Turbines proposed in the southern project show spatial distances far less, for example there is only 2.42 RD between T14 and T15 and 2.72 RD between T13 and T14. Lack of recommended separation distances between this saturated southern project will cause severe turbulence and high noise levels.

The constant low- frequency noise and amplitude modulation- swish, whoosh, thump sounds will cause us annoyance and sleep disturbance. I do shift work so the constant noise for 2 years from the daily construction will have adverse effects on my quality and quantity of sleep. Policies recognise that excessive noise is harmful to human health and can affect sleep, cardiovascular health and concentration.

The Current 2006 WEDG (20 years old) recommend that shadow flicker at dwellings within 500m of a turbine should not exceed 30 hours per year. Many homes in this project exceed this, in the proposed plans our home is denoted by number "161" and nearly exceeds this recommendation.

We watch the sunset from the back of our home, we enjoy alfresco dining on our outside patios, we have a beautiful sun lounge and a barbeque area in our garden, shadow flicker effects from these industrial turbines 160m tall will shadow our home forever and cause a continuous disturbance to our health and wellness the shadow flicker will reduce our residential amenity.

By night these 17 visible turbines will light up the dark sky with beacon lights, they will cause a flash as the blades rotate 360' every 6 seconds, the flashing beacon light will impair our good night's sleep and it will be a distraction in our home. Our home, our garden, our haven will never be the same.

Impact On Property Value

The proximity of 17 large turbines to our home with 11 turbines less than 2.5kms away will adversely devalue our property, the potential buyer market demand will severely decrease, hence hindering us getting a just - appropriate price in the open market for our dwelling. Our house wont be a favourable buy anymore, prospective buyers would not want to live near an industrial large scale windfarm, this project if granted would diminish our financial assets and lessen our children's inheritance value forever.

Inadequate and Inappropriate Consultation- Lack of Community Engagement and Transparency.

The lack of communication from Ballinlee Green Energy Limited has been observed by so many people in our community.

The first official notification we received was on the 30th of May 2025, this was a single paged letter and a one A4 double sided flyer. The flyer mentioned the potential for up to 17 turbines, and the proposed project location stated within the townlands of Ballinlee, Ballinacurra and Camas South in Co. Limerick.

Reading out these 3 townlands I didn't warrant too much concern as we don't live in the townlands mentioned, and our home doesn't neighbour these townlands, we thought we were about 4 or 5kms away from this project as marked on the A4 flyer by a dropped pin in the middle of a forest near Ballinrea .I rang the telephone number that was provided on the flyer but only got an answering machine message.

I emailed a series of questions to info@ballinleegreenenergy.ie, which were unanswered and these questions were still unanswered when we met their representatives at a private meeting at the Deerbert Hotel on the 18th September .

Our ongoing concern was:

How many turbines were proposed in close proximity to our beautiful home?

A simple question, but Ballinlee Green Energy Limited failed to answer this one simple query.

We were told by Nadine Walsh (Community Liaison Officer) the plans were not finalised and we can only tell you your nearest turbine, "which is 805 meters approximately", she said.

Patrick Mc Coubrey made fun about the turbulence noise from the mast, quote: "not as bad as Ryanair ", he answered when we asked would the wind mast cause noise nuisance We were fearful, we had no trust, their representatives lacked transparency and proper engagement.

One week later after our 18th of September meeting our intuitively became reality. Ballinlee Green Energy Limited had a planning application Case ref 323780 published in the Limerick Leader Newspaper dated Saturday 30th September, so indeed plans were finalised as of the 18th September.

Summary- No Meaningful Engagement:

On numerous occasions Ballinlee Green Energy Limited was asked to engage in a public meeting with our community but refused to engage. They claimed certain people were hostile during their engagements. This is an insult on our community.

Ballinlee Green Energy Limited did not show a two-way partnership with our community, they showed no active partnership that involved respectful, honest communication and collaboration. To receive our first communication of this enormous project under 4 months before the application was lodged is wholly inadequate. Households within 1km of a turbine were only notified. Three townlands mentioned on the flyer is totally inadequate for a development of this scale that spans over 39 townlands throughout Bruff and neighbouring towns with a 35year operational lifespan.

Ballinlee Green Energy Limited failed to allow for meaningful dialogue with our community- **EU Directive 2011/92/EU (as amended by 2014/52/EU) on Environmental Impact Assessment-The Aarhus Convention-Red III Directive (2023/2413/EU) requirements for community engagement- The Planning and Development Act 2000 (as amended)**

We kindly request that AnCoimisiuin Pleanala refuse Ballinlee Green Energy Limited for their inadequate community consultation.

Bruff

Bruff is a bustling vibrant town, located on the old Limerick - Cork Road (R512) located in the Ballyhoura region with a population of 887 in the last recorded 2022 census. The town lies on the Morning Star River. Bruff has 3 pubs, a guesthouse ,2 supermarkets many beauty salons, 2 barbers, 5 restaurants, 3 pharmacies, a veterinary clinic, groomers, a funeral director, fuel merchant and more as well as a very busy Garda station which heads the East division of Limerick County. Bruff played its part in the Irish Civil War and there is a memorial to Sean Wall commemorating his role in the struggle for Irish Independence. Bruff is home to the Thomas Fitzgerald Centre, dedicated to the memory of Thomas Fitzgerald, grandfather of President John Fitzgerald Kennedy. The story connecting the town of Bruff in County Limerick and the 35th President of the United States of America began in 1852 Bruff town is full of fascinating historical buildings and features, it is rich in local heritage and culture, contributing significantly to the story of Ireland which attracts tourists in abundance to the popular Bruff Courthouse and the Thomas Fitzgerald Centre yearly.

Lough Gur is one of Limerick's major tourist attractions and assets within 4km proximity to Bruff, it is one of Ireland's most important, distinctive, and under the radar archaeological sites. The recently restored and upgraded heritage centre provides visitors with guided tours and shares the folklore associated with the place, and the ancient history associated with the area that includes castles, stone forts and circles including the Grange Stone Circle, and the enclosed habitation site on Knockadoon. There are also megalithic tombs known as the 'Giant's Grave' and early Christian sites at Carraig Aille and the crannóg at Bolin Islands. The specific characteristics of Lough Gur support a growing popularity for its use as a setting for mindfulness and yoga retreats. Lough Gur Heritage Centre interactive multimedia exhibition brings to life over 6,000 years of archaeology and history starting during the Mesolithic (Middle Stone Age) Era and progressing until the 19th century (1800's).



Lough Gur



Grange Stone Circle

'A sun rising circle of stone refers to ancient stone circle'

The Wind Energy Development Guidelines 2019 (the Draft Revised Wind Energy Development Guidelines published by the Irish government for public consultation) and the detailed aesthetic considerations and spatial strategies explained in detail within, for the design of windfarms. A cursory look at the guidelines and various sections within, should raise significant concerns around the siting of 'any' industrial scale wind turbine developments 'within' the lowland area of the Golden vale landscape, let alone the potential siting of multiple developments, haphazardly located, at 'inappropriate locations', within the landscape. Section 1.2.2 speaks of Safeguarding our Landscape, Natural Heritage and Built Environment, and sets this out alongside references to the European Landscape convention. Section 5.3 discusses 'Natural Heritage.'

We have failed to see a VP visual photomontage from Grange Stone Circle, one of Irelands most precious archaeological sites (Our Natural Heritage) in the planning application.

The photomontage VP from Lough Gur is laughable, this location does not represent what visitors will see, If both projects – Ballinlee Green Energy project (Case 323780) and the Garrane Green Energy project (Case 323635) are granted visitors will see the cumulative effect of 26 Industrial sized turbines from this tranquil tourism hotspot.

The Visual impact is inconsistent with landscape Policy Objectives in the County Development Plan, including, Objective EH 022 and Objective EH023.

It is very notable in many of the chapters in their EIAR that Ballinlee Green Energy suggests that Bruff is 3kms away from the site, in the EIAR Chapter 15 Shadow Flicker Figure 15-3 they assess all dwellings (best practice 1.36km) approximately 20 of these homes assessed are within the town of Bruff.

Why can Ballinlee Green Energy Limited state this project is 3kms from Bruff? This is incorrectly stated, this area is not an isolated rural site, Bruff has a growing population the proposed wind farm is adjacent to the town, not in a remote rural location.

Tourism and social impacts are not assessed in the EIAR despite being significant effects of the proposed development.

Water Table and Services

There will be an impact to risk of flooding of our land near our home, the OPW manage the stream behind our home, the hydrological and peat stability risks associated with extensive excavation for the turbine bases and 10.8km of road track within the turbine site will have adverse lifetime consequences.

The Gas Transmission (High Pressure) Pipeline passes through our land folio and passes through the adjacent lands through the proposed wind farm site. We have failed to see in the project plan; What if scenario- if a blasting error / disaster occurred what measures of safety would be implemented, what access routes to the site would be taken by the fire brigades, a disaster like this could cause deadly consequences for the wider community of Bruff town. These are legitimate concerns regarding fire tender access and the adequacy of emergency response routes, which is not clearly demonstrated in the application. We believe this project (Case 323780) should be refused.

Proper clearance from T17 to the Fresnal Zone of the Slieveragh to Toureen radio link will disrupt my internet connections for my home and this will cause my working from home options difficult.

I myself use the R512 north bound to commute to work, the grid connection route will play a large disruption to my daily commute, my wife uses the R512 south bound and L1414 west bound to travel to work where the proposed link corridor connects the two projects Northern & Southern. This will cause extra stress on our time constraints to get back home to our family and hinder school runs. We use the R516 twice weekly to visit elderly parents, this road will be the main access site and we will be held up with the extra traffic volumes along this road.

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.

My neighbours barn and derelict sheds in lands Folio LK 18763 is less than 700 metres away from T15. A beautiful white barn owl has set up resident there, the development of 17 enormous 160m high turbines will have a detrimental effect on its nesting place.

The farm sheds are a haven for bats, the land is home of pheasants, hares and badgers which regularly visit our garden.

This planning application EIAR Chapter 9- Biodiversity relies on generic datasets and short survey windows, it omits locally recorded Whooper Swans feeding in flooded fields near the townland Carrigeen (the north cluster of turbines) and provides limited bat corridor mapping along treelines/ watercourses. Cumulative effects with the 110kv grid connection (Appendix 2D) are not adequately assessed. This is inconsistent with the Birds and Habitats Directives.

Visual impact, Dominance, and Cumulative Effect – Effect of the Golden Vale:

Failure to cumulatively assess the project alongside the Garrane Wind Farm CASE Ref 323635.

Insufficient cumulative assessment between Ballinlee and Garrane Windfarms.

As per application documents this other SID application is within 8km of the application site. Both projects are owned by Greensource Sustainable Developments Limited (Greensource Ltd.).

In the absence of National Territory Mapping as required by REDIII, numerous inappropriately designed, randomly located, large-scale industrial wind turbine farms, would negatively impact the visual and cultural heritage of the Golden Vale. They would disrupt the visual integrity of an area known for its open, rolling green fields and increase the visual complexity and clutter. The Golden Vale is a significant cultural and historical landscape, and this proposal would begin to change this character, diminishing its cultural value. It is known for its fertile lowlands, intensive dairy farming, and panoramic views towards the surrounding Mountains. This development in combination with future developments would introduce

large, industrial-scale turbines that could be viewed as dominating the pastoral, open character of the valley.

In the absence of national guidance compatible with EU law, I would also like to draw your attention to the Draft Revised Wind Energy Development Guidelines 2019 published by the Irish government for public consultation, which had an SEA (or even the twenty-year-old guidelines from 2006 which are incompatible with European Law), and the detailed aesthetic considerations and spatial strategies explained in detail as required within each for the design of windfarms. These guidelines are especially important to be considered where wind turbines developments are now being proposed at numerous, random and limited scale locations, and with turbine heights and spacings varying within and between developments, and with considerable detrimental in combination effects being created contrary to the proposed (or incompatible 2006) guidelines.

Breach of RED III EU Directive:

The National Landscape Strategy, Limerick Local Development Plan 2022 – 2028 and SEA Directives and EIA Directives.

RED III Directive:

Case 323780-25 has been lodged as a RED III Directive¹. This directive required Ireland to have completed by 21 May 2025 a mapping project to identify areas suitable for renewable energy development and to adopt by 21 February 2026 plans within these areas designating renewables acceleration areas. Ireland did not achieve the requirement to complete a National Territory Mapping. It rather put this out of Public Consultation in October 2025, with a Map drafted from existing areas as currently designated by Local Authorities for renewable energy.

It would be premature to grant permission, at least until it is established whether the development site is within the scope of RED III, given that the developer places such reliance on it.

The National Landscape Strategy 2015-2025 is not referenced within the application /EIAR or Limerick County Development Plan. Wind energy proposals should be evaluated within the context of the local landscape character, not just technical or economic criteria. It is a critical omission not to refer to this strategy in determining site suitability.

The Application documents lodged are incomplete

Under the Planning and Development Act it is required for the establishment of “sufficient interest” in the land by the “Applicant” to make an application.

The Applicant, Ballinlee Green Energy Limited, has not provided landowner consents or otherwise agreements as required under the Act.

Landowner consent letters, Appendix 2:

- Folios Lk 66992F and LK17398F are registered to landowner I _____ the consent for sightlines agreement for folios LK66992F and LK17398F are otherwise signed by :
- Consent between the applicant, Ballinlee Green Energy and the landowner Mr Conor Ryan, folio 6255 is not a recognised folio number.
- Consent between the applicant Ballinlee Green Energy and the landowner Mr John Murnane, folio LK 6260 has inconsistent signatures on both agreements.

- Consent between the applicant Ballinlee Green Energy and the landowner Mr Eamon Liston folio 51699F County Limerick and folio 1539F County Limerick. Per Procurationem; We have failed to find supporting documentation for explicit permission from Mr Eamon Liston to Mr Aidan Liston within the planning documentation.

The Application documents are incomplete and therefore the application lodged should be refused.

Ballinlee Green Energy Limited

Ballinlee Green Energy came into existence in August 2024, (Solo Check.ie) many aspects of their surveys and planning alternatives pre date August 2024. It is very evident in Case ref 323780 that these alternatives could not have been solely considered by that of Ballinlee Green Energy Limited (The Applicant).

Conclusion:

For the reasons outlined above, we respectfully request that AnCoimisiun Pleanala **refuse** this application. This application is not appropriate or in the Public Interest and should be refused.

Yours sincerely,

Eric Tobin & Angela Tobin