

Stonepark
Bruff
Co Limerick.
V35 XH92

13th November, 2025

**Re: Proposed wind turbines – Bruff, Dromin Ballinlee.
Case reference PAX91.323780**

Sirs,

Please consider this to be my objection to the proposed massive industrial 17 wind turbines (16 being 160 meters tip height and 1 being 150 meters tip height) in Bruff Dromin Ballinlee.

My concerns re the above are set out below:

While understanding the need for renewable energy, I think it would be best to implement the proposed Regulations with regard to Wind Turbines.

It appears that the planning for the proposed turbines is being brought under Sections 37A(2)(a) and (b) of the Planning and Development, Act, 2020.

I see that there was a proposed revisions to Wind Energy Development Guidelines 2006 in December, 2013 – targeted review in relation to noise proximity and shadow flicker. These do not seem to have been implemented.

In 2019 Minister Eoghan Murphy launched a public consultation on proposed revisions to the Wind Energy Development Guidelines. It was noted that the draft Guidelines when finalised will affect further planning applications and consideration for future wind energy development proposals.

The draft Guidelines propose the following main changes to the current Guidelines:

- new noise standards: ¹

• ¹ The draft guidelines include proposed new standards aimed at reducing noise nuisance from wind energy developments for local residents and communities. The proposed new standards are in line with the most up-to-date international standards, as incorporated in the 2018 World Health Organisation Environmental Noise Guidelines for the European Region. The permitted noise levels will take account of certain noise characteristics

- setback distance:²
- automatic shadow flicker control mechanisms:³
- community consultation:⁴
- community dividend:⁵
- grid connections:⁶

It is interesting that of the 8 pieces of proposed legislation 6 were allowed to lapse, one was defeated and the most recent one dated 2025 is before the Dail;

- Wind Turbines Bill 2012 (No 9/2012) - lapsed
- Environment and Public Health (Wind Turbines) Bill 2012 (98/2012) - lapsed
- Environment and Public Health (Wind Turbines) Bill 2013 (119/2013) - lapsed
- Environment and Public Health (Wind Turbines)(No. 2) Bill 2013 (120/2013) - lapsed
- Environment and Public Health (Wind Turbines)(No. 3) Bill 2013 (121/2013) - lapsed
- Wind Turbine Regulation Bill 2014 (19/2014) -lapsed
- Wind Turbine Regulation Bill 2016 (69/2014) -defeated
- Wind Turbine Regulation Bill 2020 (63/2020) -lapsed
- Wind Turbine Regulation Bill 2025 (29/2025) - before the Dail

specific to wind energy projects i.e. tonal, amplitude modulation and low frequency noise and provide penalties for tonal noise and amplitude modulation and a threshold for low frequency noise above specified limits which, if breached, will result in turbine shut down. The implementation of a new robust noise monitoring framework is also proposed

- ² The draft guidelines require a setback distance for visual amenity purposes of four times the tip height between a wind turbine and the nearest point of the curtilage of any residential property in the vicinity of the proposed development, subject to a minimum mandatory setback distance of 500 metres. This setback requirement is also subject to the need to comply with the proposed noise limits outlined above

- ³ Automatic shadow flicker control mechanisms will be required to be in place for the operational duration of a wind energy development project. It will be a specific condition of planning permissions that should shadow flicker occur and impact existing properties, the relevant wind turbines must be shut down

⁴ Wind energy developers will be mandatorily required to engage in active public consultation with the local community at an early stage. In this regard, they will have to prepare and submit a 'Community Report' as part of their planning application outlining how they have consulted and engaged with the local community regarding the proposed development and how they will work with the local community to allow for the free flow of information between the community and the developer at all stages in the project

⁵ Wind energy developers will have to provide an opportunity for the proposed development to be of enduring economic or social benefit to the local community, whether by facilitating community investment/ ownership in the project, other types of benefits/ dividends, or a combination of the two

⁶ The draft guidelines contain updated guidance regarding the Environmental Impact Assessment-related requirements in respect of wind energy development projects and their related grid connections, arising from a High Court Judicial Review (*O Grianna and others v. An Bord Pleanála*)

Understanding the way that big business works, I suspect that this is going to be pushed through given the “green agenda” being promoted by Ministers, TD’s and the EU, most recently our current Taoiseach at COP30 in Brazil (who appears to have promised “*that we in Europe have now set our sights on reducing our collective emissions by 90% by 2040*”). First reduce/close the plants in Ireland that were creating power and supplying it to the grid, then save us by introducing wind turbines and green energy. It would be interesting to see if the infrastructure is in place to transfer energy produced from the turbines and solar into the grid/system or whether we are going to export it. I will be dead by the time these turbines have grown silent – what are the proposals to dispose of same?

It doesn’t make it right that you are going to destroy this part of this island on the edge of the Atlantic to save the planet. Given the amount of “damage” is being created by Ireland, I think we are being disproportionately penalised for the sins of the rest of the planet. It seems that a vast majority are against these wind turbines and are actively saying “no” to them, yet big business and government seem to be happy to force these through at any cost.

Given the concerns with regard to noise from these massive turbines and shadow flicker (referred to in the most recent Bill 29/2025) I have serious concerns with regard to the impact these turbines will have on the health of humans and animals in the environs, together with the detrimental effect on the socioeconomic impact to the area. I have a particular concern re noise - Amplitude modulation • Impulsiveness • Infrasound • Low frequency noise • Tonality.⁷

The traffic that these country roads will have to withstand with cement lorries and all the ancillary heavy goods vehicles to facilitate the building of these turbines is going to destroy the road network (and they are already in a poor enough state). A knock on effect on our already disastrous housing crisis is given the amount cabling which will have to be laid along the road frontage and the resultant negative impact on planning permissions being sought and granted.

Today the corcass is already flooding. I suspect the amount of work that is proposed on an existing flood plain, the flooding can only get worse.

Given all the research you have done with bird watchers/spotters over the last number of years, I am sure that you are well aware of the number of Whooper Swans, cuckoo, otters and badgers in the corcass. Bird strikes are a known risk with wind turbines.

⁷ (Wind Farm Noise Research Study - Marshall Day Acoustics (updated April 2021))

Understanding that one of reasons wind energy was promoted was to reduce the cost of electricity, it seems not to be working. Yes, I am aware that we need more power now more than ever before – noting that data centers in 2023 used the same amount of power as all the domestic households in Ireland. Data centers continue to be built so more power is required by them (no mention here of the volume of water they use). A question has to be asked are we going to keep this power in our grid or export it?

Yours,

Ita Lynch