

OBJECTION TO BALLINLEE WIND FARM

FORMAL SUBMISSION TO AN COIMISIÚN PLEANÁLA

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.

Application by: Ballinlee Green Energy Ltd.

An Coimisiún Pleanála Reference: PAX91.323780

Submitted by:

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Date: 14/10/2025

Submitted to:

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

OBJECTION TO PROPOSED DEVELOPMENT

Dear Sir/Madam,

I wish to make a formal objection to the above-referenced planning application for the Ballinlee Wind Farm comprising 17 wind turbines (16 at 160m height and 1 at 150m height), associated infrastructure, underground grid connection to Killonan Substation (Ballysimon), and all ancillary works.

MY POSITION ON RENEWABLE ENERGY

I wish to emphasize at the outset that I fully support Ireland's transition to renewable energy and recognize the urgent need for increased green energy generation to meet our climate commitments. I am not opposed to wind energy development in principle. However, I object to THIS specific proposal due to its inappropriate scale and location, proximity to the town of Bruff and extensive residential population, inadequate community consultation process, and the failure by the developer to seek a balanced solution that protects both renewable energy goals and community wellbeing.

This objection is not anti-renewable energy. It is a request that large-scale commercial developers engage respectfully and meaningfully with communities, and find balanced solutions rather than imposing industrialized infrastructure without genuine consultation or regard for residential amenity.

MY CIRCUMSTANCES

I reside at Newtown Bruff Co Limerick v35 HX71, located: - **2 kilometers from the nearest proposed wind turbine - Less than 1 kilometer from the proposed underground grid connection cable route to Ballysimon (Killonan Substation)**.

My property overlooks the general area of the proposed wind farm. Multiple turbines will be clearly visible from my home and will fundamentally alter the rural landscape character and views I currently enjoy.

I will be significantly impacted by this development in multiple ways: 1. **Visual impact** from the wind turbines themselves 2. **Construction disruption** from the grid connection works near my property 3. **Traffic impacts** during both wind farm and grid connection construction 4. **Property devaluation** due to proximity to industrial-scale infrastructure 5. **Cumulative impact** from being affected by both major elements of the development

I purchased this property in 2001 specifically for its rural character, tranquil setting, and open countryside views. This development will permanently and fundamentally alter these characteristics.

GROUNDS FOR OBJECTION

1. INADEQUATE AND INAPPROPRIATE COMMUNITY CONSULTATION

The applicant claims in the Environmental Impact Assessment Report (EIAR) Chapter 1, page 1-8, to have undertaken "meaningful and transparent community engagement." **This claim is fundamentally incorrect and constitutes a material deficiency in the planning process.**

1.1 Failure to Hold Public Meetings

Despite repeated requests from community representatives, the developer refused to hold public meetings to allow the community to collectively understand the scale and impacts of the proposed development. Instead, the developer conducted private “consultation clinics” by appointment only.

This approach: - Prevented residents from understanding the collective community impact - Isolated individual residents and prevented coordinated community response - Denied opportunity for public questions and answers in an open forum - Prevented residents from hearing the concerns of their neighbors - Created the appearance of a deliberate divide-and-conquer strategy - Failed to allow for meaningful dialogue about project alternatives or modifications

Public meetings are standard practice for Strategic Infrastructure Developments of this scale and are essential for meaningful consultation as required under: - EU Directive 2011/92/EU (as amended by 2014/52/EU) on Environmental Impact Assessment - The Aarhus Convention (public participation in environmental decision-making) - RED III Directive (2023/2413/EU) requirements for community engagement - The Planning and Development Act 2000 (as amended)

The developer’s refusal to participate in public meetings suggests an unwillingness to genuinely engage with community concerns or consider modifications to the proposal based on community input.

1.2 Inadequate Timeline

Formal community engagement commenced in **May 2025**, with the planning application submitted in **September 2025**. This **4-month period is wholly inadequate** for:

- A 17-turbine wind farm covering 39 townlands
- A development spanning over 255 hectares
- A project affecting approximately 400 homes within 2km
- Infrastructure requiring a 10-year construction permission
- A development with a 35-year operational lifespan

Meaningful consultation should have commenced at the project design and site selection stage, allowing community input to genuinely inform decisions about: - Site selection and suitability - Number and location of turbines - Setback distances from residential properties - Grid connection routing - Mitigation measures - Community benefit arrangements

Instead, consultation occurred only after all fundamental design decisions had been finalized, rendering the process meaningless. The community was presented with a fait accompli, not invited to participate in project design.

1.3 Inadequate Engagement with Bruff Town

This development is immediately adjacent to Bruff, a town with a significant population. The consultation process failed to adequately engage with the town's residents through: - No public meetings in Bruff - Limited information about impacts on the town - Failure to assess cumulative impact on the town as a whole - No engagement with Bruff businesses, schools, or community organizations

The developer treated this as an isolated rural development when in fact it will fundamentally affect an entire town and its hinterland.

1.4 Information Deficits During Consultation

The consultation materials provided to residents failed to include: - Specific noise modeling at individual residential properties - Accurate visual impact representations from key viewpoints - Detailed grid connection route information and impacts - Construction traffic routing, volumes, and duration - Cumulative impact assessment with other proposed developments (Garrane Wind Farm) - Meaningful information about property value protection - Details of community benefit fund structure and guarantees

Without this critical information, residents could not make informed responses during the consultation period.

1.5 RED III Directive Requirements

The RED III Directive (Directive 2023/2413/EU), transposed into Irish law in August 2025, establishes renewable energy projects as being in the overriding public interest. However, **this presumption is predicated on meaningful community engagement and shared benefits.**

Article 16f requires Member States to ensure renewable energy projects engage genuinely with affected communities. The consultation approach adopted by Ballinlee Green Energy Ltd. fails to meet the spirit and intention of these requirements.

A project that claims overriding public interest status must demonstrate that it has genuinely engaged with and addressed the concerns of the affected public.

1.6 Requested Action on Consultation

I respectfully request that An Coimisiún Pleanála:

1. Find that the community consultation process was inadequate and constitutes a material deficiency
 2. Require the applicant to undertake comprehensive community consultation including public meetings
 3. Defer determination of this application until meaningful consultation has occurred
 4. Require the applicant to demonstrate how community input has informed project modifications
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2. GRID CONNECTION IMPACTS - DUAL IMPACT ON MY PROPERTY

My property is uniquely affected by being impacted by BOTH the wind farm itself AND the grid connection infrastructure. I am located less than 1km from the proposed underground cable route to Killonan Substation (Ballysimon). The EIAR inadequately assesses the impacts of the grid connection on residents along the cable route.

2.1 Construction Phase Impacts

The underground grid connection will require: - Extensive trenching along public roads over several kilometers - Heavy construction machinery operating for an extended period - Significant construction traffic (cement mixers, excavators, cable drums, etc.) - Potential road closures or single-lane traffic management - Noise and dust impacts on nearby residential properties - Risk of damage to existing underground utilities (water, telecommunications, gas) - Disruption to local access and daily life

The EIAR fails to adequately assess these construction impacts on residents living along the cable route, including my property.

Specific deficiencies include: - No detailed construction methodology for grid connection - No traffic management plan for grid connection works - No noise assessment at properties along the cable route - No dust suppression measures outlined - No compensation mechanism for residents affected by prolonged construction

2.2 Duration and Phasing Uncertainty

The application seeks a **10-year construction permission**. The EIAR does not clearly specify: - When grid connection construction will commence - Duration of trenching and cable installation works - Phasing of works along the cable route - Coordination between wind farm and grid connection construction - Access arrangements for residents during construction phases - Restoration timeline for affected roads and verges

Residents along the cable route, including myself, face up to 10 years of uncertainty about when and for how long we will experience construction impacts. This is unacceptable and creates a planning blight on affected properties.

2.3 Cumulative Impact - Double Jeopardy

I am in the unique position of being significantly impacted by BOTH major elements of this development:

1. **Wind farm impacts:** Visual impact, potential noise impact, landscape character change, property devaluation
2. **Grid connection impacts:** Construction noise, traffic, dust, disruption, road works

The EIAR fails to adequately assess this cumulative impact on residents who, like myself, are affected by multiple elements of the development simultaneously.

The cumulative assessment in Chapter 18 (Interaction of the Foregoing) does not adequately address how residents in my position will experience: - Prolonged construction

disruption from both elements - Visual impact from turbines PLUS infrastructure disruption from grid works - Property value impacts from BOTH proximity to turbines AND location on grid route - Quality of life impacts from multiple, overlapping construction phases

2.4 Lack of Grid Route-Specific Consultation

The community consultation conducted by the developer focused almost exclusively on the wind farm site itself. **There was grossly inadequate engagement with residents along the grid connection route** about: - Specific impacts we will experience - Mitigation measures to protect our amenity - Construction timing and duration - Access and traffic management - Compensation or property protection

Many residents along the grid route may not even be aware they will be significantly impacted by this development.

2.5 Requested Actions on Grid Connection

I request that An Coimisiún Pleanála:

1. Require detailed assessment of grid connection construction impacts at all residential properties within 100m of the cable route
2. Require a comprehensive Construction and Environmental Management Plan specifically for grid connection works as a condition of any permission
3. Limit construction hours to protect residential amenity
4. Require traffic management plan for grid connection construction
5. Require advance notice to affected residents (minimum 4 weeks) before works commence
6. Require compensation mechanism for residents affected by grid connection construction
7. Require independent monitoring of noise, dust, and vibration during grid works

3. VISUAL IMPACT AND PROPERTY DEVALUATION

My property overlooks the general area of the proposed wind farm. **Multiple turbines will be visible from my home, fundamentally altering my property's amenity, character, and value.**

3.1 Scale and Visibility

The proposed turbines are: - **160m in height** (16 turbines) - **40 meters taller than Dublin's Spire** - **150m in height** (1 turbine) - **136m rotor diameter** - nearly the length of Croke Park's playing pitch

At a distance of just over 2km from my property: - Multiple turbines will be clearly and prominently visible - The turbines will dominate the skyline and views from my property - Rotating blades will create constant visual movement drawing the eye - The scale of the

structures will overwhelm the rural landscape - Aviation lighting (red warning lights) may be required, impacting night-time views and dark skies - The rural agricultural character of the landscape will be replaced by industrial infrastructure

The human eye can clearly distinguish a 160m structure at 2km distance. These turbines will be a dominant and unavoidable feature of my daily visual environment.

3.2 Inadequate Visual Impact Assessment

The EIAR Volume IV (Photomontages) and Chapter 12 (Landscape and Visual Impact Assessment) contain serious deficiencies:

Missing viewpoints: - No photomontages appear to adequately represent views from my property location - Insufficient viewpoints from residential properties at 2-3km distance - Inadequate representation of views from Bruff town - No viewpoints from Bruff approach roads or residential areas

I REQUEST that An Coimisiún Pleanála require specific photomontages from: - My property location - Bruff town center (multiple viewpoints) - Bruff approach roads from all directions - Other residential properties between 2-3km (representative sample)

Cumulative visual impact inadequately assessed: The LVIA must consider cumulative visual impact with: - All 17 turbines viewed together (not assessed individually) - Proposed Garrane Wind Farm (9 turbines, approximately 8km away) - Any other existing or proposed wind energy developments visible from the area

From many locations, including potentially my property, **multiple wind farms may be visible simultaneously, creating an industrialized landscape character wholly inappropriate for this rural agricultural area.**

3.3 Impact on Bruff Town - Population Center Ignored

The EIAR inadequately addresses visual impact on Bruff town and its residents. **This is not a remote rural location.** Bruff is a significant population center and the visual amenity of hundreds of town residents will be permanently and fundamentally affected.

The turbines will be visible from: - Bruff town center and main streets - Residential estates and individual homes - Schools (visual impact on children's environment) - Churches and community facilities - Recreation areas and playing fields - Approach roads (creating industrial gateway to town)

The EIAR treats this as an isolated rural development. It is not. This is a development immediately adjacent to a town, and the visual impact assessment must reflect this reality.

3.4 Property Devaluation - Unassessed Financial Harm

My property is my primary financial asset and represents my pension provision and financial security. Research and market evidence consistently demonstrate that residential properties within 2-3km of wind farms experience:

- **Difficulty in achieving sale** (significantly longer marketing periods)
- **Reduced sale prices** (studies indicate 10-25% reduction depending on proximity and visibility)
- **Loss of buyer interest** (wind farm proximity is a deal-breaker for many buyers)
- **Mortgage valuation issues** (lenders may reduce valuations or decline mortgages)
- **Insurance considerations** (some insurers increase premiums or decline coverage)

The EIAR contains NO assessment whatsoever of property devaluation impacts. This is a serious and material omission that: - Fails to acknowledge real financial harm to residents - Ignores a significant environmental and social impact - Demonstrates lack of regard for community wellbeing - Violates EIA Directive requirements to assess all significant effects

I purchased this property [INSERT YEAR AND PRICE IF YOU WISH] specifically for: - Its rural character and tranquil setting - Open countryside views - Distance from industrial or commercial development - Quality of life in a peaceful rural environment - Investment and financial security

The proposed development will fundamentally alter or destroy every one of these characteristics and will substantially reduce both the value and the saleability of my property.

3.5 No Property Protection Scheme

The developer has proposed no mechanism to: - Compensate residents for property devaluation - Guarantee property purchase at pre-development value if residents wish to relocate - Provide independent property valuation support - Establish a property value protection fund

This represents a transfer of wealth from residents to a commercial developer. The developer will profit while residents suffer financial loss with no compensation or protection.

3.6 Requested Actions on Visual Impact and Property

I request that An Coimisiún Pleanála:

1. Require additional photomontages from residential properties including my location and from Bruff town
2. Require independent property valuation assessment of impacts on residential properties within 3km
3. Require the developer to establish a Property Value Protection Scheme guaranteeing:
 - Independent pre-development property valuations for all properties within 2.5km
 - Compensation for diminution in value if properties sell below pre-development valuation

- Right to require developer to purchase property at pre-development value
 - Establishment of property protection fund with independent administration
4. Refuse permission on grounds of unacceptable visual impact on residential amenity and Bruff town
 5. If permission is granted, require substantial financial security for property compensation as a condition
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4. INAPPROPRIATE SCALE AND LOCATION ADJACENT TO POPULATION CENTER

This proposal is fundamentally different from typical wind farm developments due to its location immediately adjacent to Bruff town and the extraordinary number of residential properties within the impact zone.

4.1 Exceptional Number of Affected Residents

The EIAR acknowledges (Chapter 1) that approximately **400 homes are located within 2km of the proposed development**. This is an exceptional and extraordinary number for a wind farm development and should raise serious concerns about site suitability.

When a proposed development will significantly impact 400+ homes and families, the presumption must be to find alternative locations that minimize residential impact.

For context: - Typical wind farms affect 20-50 homes within 2km - This development affects 8-20 times the normal residential impact - This translates to potentially 800-1,200 people directly affected - Children, elderly, and vulnerable persons included in affected population

The scale of residential impact is unprecedented and demonstrates that this site is inappropriate for industrial-scale wind energy development.

4.2 Proximity to Bruff - Not an Isolated Rural Site

Bruff is a town with a population of approximately 800 residents. The proposed wind farm is immediately adjacent to the town, not in a remote rural location.

Bruff residents chose to live in a rural town specifically for: - Rural landscape character and visual amenity - Tranquility and low ambient noise environment - Dark skies and rural character - Access to unspoiled countryside - Quality of life associated with rural living - Community cohesion in a rural setting

This development will fundamentally and permanently alter the character of Bruff from a rural town to a town surrounded by and dominated by industrial energy infrastructure.

The impact on Bruff includes: - Visual impact from the town and all approach roads (industrial gateway effect) - Noise impact on town residents within 2km - Change in town

character and identity - Impact on community cohesion and wellbeing - Economic impacts (see below) - Tourism impacts (proximity to Lough Gur archaeological and tourism site)

The EIAR does not adequately assess the impact on Bruff as a community and population center. The assessment treats individual impacts in isolation rather than assessing the collective impact on an entire town.

4.3 Economic Impact on Bruff

The proposed development will have negative economic impacts on Bruff that are not assessed in the EIAR:

Property devaluation across the town will: - Reduce the overall asset base of the community - Make the town less attractive for new residents - Reduce property tax base for local services - Create difficulty for young families trying to build equity

Business and services impacts: - Reduced attractiveness for new businesses - Potential closure of existing businesses if population declines - Difficulty attracting professional services (doctors, dentists, etc.) - Impact on retail and hospitality sectors

Tourism impacts: - Bruff's proximity to Lough Gur (major archaeological and tourism site) is an economic asset - Wind farm will be visible from Lough Gur area - Industrial infrastructure detracts from tourism appeal - Potential loss of tourism revenue for Bruff businesses

Population decline risk: - Young families may choose not to move to Bruff - Existing residents may relocate if able - Aging population without young family replacement - Long-term viability of schools and community facilities at risk

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

4.4 Alternative Site Selection - Inadequately Justified

Given the exceptional population density around this proposed site, **the developer should have selected an alternative location further from residential areas.**

Chapter 3 of the EIAR (Consideration of Alternatives) does not adequately address: - Why a location adjacent to a town was selected - What alternative sites were considered and rejected - Whether sites with fewer residential impacts exist - How residential amenity was weighted in site selection - Whether reducing turbine numbers to reduce impact was considered

The impression created is that site selection was driven primarily by land availability and wind resource, with insufficient weight given to residential amenity and community impact.

An Coimisiún Pleanála should require the developer to demonstrate that no alternative sites exist with better wind resource and fewer residential impacts.

4.5 Community Benefit Fund - Inadequate Compensation

The proposed Community Benefit Fund is: - **€350,000 per year** (approximately €2 per MWh produced) - **Conditional on the project securing RESS (Renewable Electricity Support Scheme) support** - NOT guaranteed - **Limited to 15 years** (duration of RESS support) - NOT the 35-year operational life - **Total over 15 years: €5.25 million**

This is wholly inadequate compensation for the scale of impact:

Per affected household: - 400 homes affected = €875 per household per year (if all 400 homes benefit equally) - Over 15 years = €13,125 per household total - Over 35-year operational life = €0 per household for years 16-35

Compare to property devaluation: - Average property devaluation of 10-15% on €250,000 property = €25,000-37,500 loss - Community benefit of €13,125 per household doesn't cover half the property loss - No benefit for years 16-35 of operation

Additional concerns: - Fund is conditional on RESS - what if project doesn't secure RESS support? - No guaranteed community benefit for over half the operational life (years 16-35) - No property value protection component - No compensation for loss of amenity, health impacts, or quality of life - Distribution mechanism unclear - will all affected residents benefit equally?

This is not meaningful community benefit. It is token compensation that does not address the real financial and quality of life harms that residents will suffer.

4.6 Requested Actions on Scale and Location

I request that An Coimisiún Pleanála:

1. **Refuse permission** on the grounds that this site is inappropriate due to proximity to a significant population center (Bruff) and the exceptional number (400+) of affected residential properties
 2. Require the developer to identify and assess alternative sites with fewer residential impacts
 3. If permission is considered, require substantial reduction in turbine numbers (e.g., maximum 8-10 turbines)
 4. Require relocation of turbines away from Bruff and areas of highest residential density
 5. Require guaranteed (not conditional) community benefit fund for full 35-year operational period
 6. Require minimum community benefit of €1 million per year (reflecting scale of impact)
 7. Require property value protection scheme as outlined in Section 3.6 above
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5. EXCESSIVE CONSTRUCTION PERIOD AND UNCERTAINTY

The applicant seeks a **10-year permission for construction**. This is wholly excessive, highly unusual, and creates unacceptable uncertainty for affected residents.

5.1 Excessive Duration

Typical wind farm construction timeline: 18-24 months

A 10-year construction permission suggests: - Phased construction over many years (prolonging impact on residents) - Potential construction delays and gaps (uncertainty about when impacts occur) - Possible financing or project viability issues (why would 10 years be needed for 17 turbines?) - Land banking or market speculation (holding permission while awaiting optimal market conditions) - Commercial hedging rather than genuine construction timeline

There is no credible justification for a 10-year construction window for a 17-turbine wind farm.

5.2 Impact on Residents - Planning Blight

A 10-year construction permission window creates:

Uncertainty and planning blight: - Residents face up to 10 years of uncertainty about when construction will commence and how long it will last - Property transactions effectively frozen (buyers will not purchase with construction uncertainty) - Life planning severely disrupted (retirement plans, family decisions, relocation needs all on hold) - Potential for multiple construction phases affecting different areas at different times - Mental health and stress impacts from prolonged uncertainty

Financial harm: - Properties cannot be sold during uncertainty period - Property values depressed for entire 10-year period - Residents effectively trapped in properties they may wish to leave - Retirement and financial planning impossible

Grid connection timing uncertainty: - Residents along the grid connection route (including myself) have no clarity about when construction will affect us - Could be year 1 of permission or year 9 of permission - Makes life planning impossible

This level of uncertainty is unreasonable and unacceptable. It represents a form of planning blight that will cause real harm to hundreds of families for up to a decade.

5.3 Lack of Construction Phasing Clarity

The EIAR does not provide: - Clear construction phasing plan - Which turbines will be constructed in which phases - When grid connection construction will occur - Coordination between different construction elements - Certainty for residents about timing of impacts

Without a clear phasing plan, residents cannot anticipate or prepare for impacts, making the uncertainty even more harmful.

5.4 Requested Actions on Construction Period

I request that An Coimisiún Pleanála:

1. **Refuse to grant a 10-year construction permission** as excessive and unjustified
 2. Limit any construction permission to a maximum of 3 years from commencement
 3. Require a detailed construction phasing plan as a condition of permission, specifying:
 - Start and end dates for each phase
 - Which turbines constructed in which phase
 - Grid connection construction timeline
 - Advance notice requirements to affected residents (minimum 6 months before each phase)
 4. Require the developer to justify why any period beyond 3 years is necessary
 5. Include condition that permission lapses if substantial construction has not commenced within 18 months
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6. PROCESS CONCERNS AND PLANNING GROUNDS

6.1 Compliance with Wind Energy Guidelines

The proposed development has been designed and assessed in compliance with the **Wind Energy Development Guidelines 2006**.

However, **Draft Revised Wind Energy Development Guidelines were published in 2019** containing substantially updated and strengthened provisions on: - Noise limits and assessment methodology - Setback distances from residences - Shadow flicker assessment and limits - Community consultation and benefit - Visual impact assessment

These draft guidelines represent current best practice and up-to-date scientific understanding of wind farm impacts. The 2006 guidelines were written when turbines were approximately 80-100m height (one-third the size of these proposed 160m turbines).

The developer states in the EIAR (Chapter 1) that the draft guidelines “have not yet come into force” and therefore the development has been assessed against the 2006 guidelines.

This approach is inappropriate for several reasons: 1. The draft 2019 guidelines reflect current scientific understanding and best practice 2. Turbine technology has fundamentally changed since 2006 (turbines are now 50-60% taller) 3. The 2006 guidelines did not anticipate turbines of this scale 4. The RED III Directive (transposed August 2025) requires renewable projects to be developed with genuine community engagement, reflected in the 2019 draft guidelines

I request that An Coimisiún Pleanála assess this application against the 2019 draft guidelines as representing current best practice, or at minimum require the developer to demonstrate compliance with both sets of guidelines.

6.2 RED III Directive and Overriding Public Interest

The RED III Directive (Directive 2023/2413/EU) establishes a presumption that renewable energy projects are in the overriding public interest (IROPI).

However, this presumption is not absolute and does not mean planning permission must be granted regardless of impacts.

The presumption of overriding public interest requires: - Meaningful community engagement (not demonstrated here) - Shared community benefits (inadequate here) - Appropriate environmental assessment (deficient here) - Balance between renewable energy goals and other legitimate interests

A project cannot claim the presumption of overriding public interest when it has failed to genuinely engage with the affected community and has failed to address or adequately mitigate significant environmental and social impacts.

6.3 Proper Planning and Sustainable Development

Section 37(2)(b)(i) of the Planning and Development Act 2000 (as amended) requires An Coimisiún Pleanála to refuse permission if a development would not be consistent with proper planning and sustainable development.

This proposed development is not consistent with proper planning and sustainable development because:

1. **Social pillar:** Causes significant harm to community wellbeing without meaningful engagement or adequate compensation
2. **Economic pillar:** Causes property devaluation and economic harm to Bruff without commensurate local economic benefit
3. **Environmental pillar:** While contributing to renewable energy, fails to adequately protect residential amenity and landscape character

Proper planning requires balancing competing interests. This proposal achieves renewable energy generation at unacceptable cost to residential amenity, community wellbeing, and proper planning principles.

7. CUMULATIVE IMPACTS - INADEQUATELY ASSESSED

Chapter 18 of the EIAR (Interaction of the Foregoing) and cumulative assessment sections throughout the EIAR inadequately assess cumulative impacts.

7.1 Cumulative Impact with Other Wind Farm Proposals

Garrane Green Energy Wind Farm (9 turbines) is proposed approximately 8km from Ballinlee. Planning application reference: ACP-323635-25.

From many locations, both wind farms may be visible simultaneously. The EIAR does not adequately assess: - Combined visual impact of 26 turbines (17 Ballinlee + 9 Garrane) in the landscape - Cumulative effect on rural landscape character - Combined noise impact on properties between the two developments - Cumulative construction traffic impacts if developments proceed in parallel - Combined impact on Bruff (Garrane is also relatively close to the town)

The cumulative assessment treats Garrane as a distant development. At 8km, with turbines of this scale, both developments will be prominent in the same viewshed.

7.2 Cumulative Impact with Other Renewable Energy Developments

Table 1-6 of the EIAR identifies 11 renewable energy projects within 20km, including several solar farms. The cumulative assessment does not adequately address: - The industrialization of this rural landscape through multiple renewable energy developments - The combined impact on rural character and tourism potential (Lough Gur) - Whether there is a cumulative "tipping point" beyond which rural character is lost - The equity issue of one area bearing disproportionate renewable energy infrastructure

7.3 Cumulative Impact on Individual Residents (Including Myself)

As noted in Section 2.3, I am affected by BOTH the turbines AND the grid connection. **The cumulative assessment does not adequately address how residents in my position experience:** - Multiple, overlapping construction impacts - Visual impact from turbines PLUS disruption from grid works - Combined property value impact - Cumulative stress and quality of life impacts

7.4 Cumulative Impact on Bruff

The EIAR entirely fails to assess the cumulative impact on Bruff as a community: - Multiple turbines visible from the town - Potential visibility of Garrane wind farm also - Noise impact on town residents - Construction traffic through or near the town - Combined effect on property values across the town - Impact on town identity and character - Economic impacts on the town

Cumulative impact assessment cannot be limited to individual environmental receptors. It must assess cumulative social and community impacts.

8. WHAT SHOULD HAVE HAPPENED - CONSTRUCTIVE ALTERNATIVES

I emphasize again that **I support renewable energy development and Ireland's climate goals.** However, support for renewable energy does not mean accepting any development regardless of location, scale, process, or community impact.

This proposal fails on fundamental grounds that could have been avoided through a better process and approach.

8.1 What a Responsible Developer Would Have Done

A developer genuinely committed to community partnership and sustainable development would have:

1. **Engaged early and meaningfully:**
 - Community consultation at the site selection and design stage
 - Public meetings to hear collective community concerns and questions
 - Genuine listening and willingness to modify proposal based on community input
 - Transparent sharing of information about impacts and mitigation
2. **Considered community concerns in design:**
 - Reduced number of turbines to minimize impact
 - Relocated turbines away from Bruff and areas of highest population density
 - Selected grid connection route with minimal residential impact
 - Designed in meaningful setbacks beyond minimum requirements
3. **Provided real community benefits:**
 - Guaranteed (not conditional) community benefit fund
 - Community benefit for full operational life (35 years), not just 15 years
 - Property value protection scheme for all affected residents
 - Local employment guarantees
 - Community ownership or equity participation options
4. **Allowed adequate time:**
 - 12-18 months consultation before application, not 4 months
 - Multiple rounds of engagement allowing community to understand and respond
 - Opportunities for genuine dialogue and project modification

This is not unreasonable. This is basic respect for communities affected by major infrastructure developments.

8.2 Alternative Approaches That Should Be Considered

If An Coimisiún Pleanála is minded to support renewable energy development in this general area (which I would support in principle), alternatives should include:

Option 1: Substantially Reduced Development - Reduce from 17 turbines to 8-10 turbines maximum - Relocate turbines away from Bruff to less populated areas of the site - Increase setbacks from residential properties - Re-consult with community on revised proposal

Option 2: Alternative Site Selection - Identify alternative sites further from population centers - Consider offshore wind or mountain locations with fewer residential impacts - Balance wind resource against community impact more equitably

Option 3: Alternative Technologies - Consider solar farms (lower visual impact, no noise impact) - Consider combination of smaller-scale technologies distributed across multiple less-sensitive sites - Consider battery energy storage systems to complement existing renewable generation

Option 4: Community Partnership Model - Offer community equity participation (genuine ownership, not token benefit fund) - Structure development as community energy project with commercial partner - Ensure community receives fair share of profits over full operational life

These alternatives would achieve renewable energy generation while better protecting community wellbeing and residential amenity.

9. CONCLUSION

This planning application should be refused for the following reasons:

9.1 Material Deficiencies in the Application

1. **Inadequate and inappropriate community consultation** that fails to meet legal and policy requirements for meaningful public participation
2. **Inadequate environmental assessment** including:
 - Inadequate visual impact assessment (missing key viewpoints)
 - No assessment of property devaluation
 - Inadequate assessment of grid connection impacts
 - Inadequate cumulative impact assessment
 - Inadequate assessment of impacts on Bruff as a community
3. **Inadequate consideration of alternatives**, particularly alternative sites with fewer residential impacts

9.2 Planning Grounds for Refusal

1. **Inappropriate scale and location:**
 - 17 turbines, 160m height is excessive for this landscape
 - Location adjacent to Bruff town is inappropriate
 - 400+ affected homes is an exceptional and unacceptable level of residential impact
2. **Unacceptable impact on residential amenity:**
 - Visual impact on hundreds of homes and Bruff town
 - Noise impact potential
 - Property devaluation without compensation
 - Quality of life impacts
3. **Not consistent with proper planning and sustainable development:**

- Fails to balance renewable energy benefits against community harm
 - Inadequate community engagement and benefit
 - Causes significant social and economic harm to Bruff
4. **Excessive construction period** (10 years) creating unacceptable planning blight
 5. **Process failures** that undermine the legitimacy of the application

9.3 Requested Decision

PRIMARY REQUEST:

I respectfully request that An Coimisiún Pleanála REFUSE this application on the grounds set out above, particularly: - Material deficiency in community consultation - Inappropriate location adjacent to significant population center - Excessive scale (17 turbines affecting 400+ homes) - Inadequate environmental assessment - Not consistent with proper planning and sustainable development

ALTERNATIVE REQUEST:

If An Coimisiún Pleanála is minded to grant permission (which I strongly oppose), I request that the Commission:

1. **DEFER the decision and require:**
 - Comprehensive community consultation including public meetings
 - Revised proposal demonstrating how community input has been incorporated
 - Additional environmental assessment addressing deficiencies identified above
 2. **SUBSTANTIALLY MODIFY the proposal** by condition to include:
 - Reduced scale (maximum 8-10 turbines)
 - Relocated turbines away from Bruff and areas of highest population density
 - Reduced construction period (maximum 3 years)
 3. **IMPOSE CONDITIONS** including:
 - Property Value Protection Scheme as outlined in Section 3.6
 - Guaranteed community benefit fund of minimum €1 million per year for full 35-year operational life
 - Comprehensive Construction and Environmental Management Plan with specific protections for residential amenity
 - Independent noise, dust, and vibration monitoring during construction
 - Noise limits and shadow flicker elimination at all residential properties
 - Advance notice requirements to affected residents
 - Rights for residents to lodge complaints with mandatory investigation
 - Financial bond for decommissioning and site restoration
-

10. REQUEST FOR ORAL HEARING

Given the scale of this development, the number of affected residents (400+ homes), the level of community concern, and the material deficiencies and planning grounds raised in this objection, **I respectfully request that An Coimisiún Pleanála hold an Oral Hearing** to allow:

- Affected residents to present evidence and testimony
- Technical experts to present evidence on impacts
- Cross-examination of the applicant's evidence and consultants
- Full public airing of community concerns
- Transparent examination of the planning and environmental issues raised

I reserve my right to present oral evidence at any such hearing and to be legally represented if necessary.

11. DECLARATION

I confirm that: - I am the owner/resident of the property at Newtown, Bruff, Co Limerick, V35 H81 - I will be directly and significantly impacted by the proposed development - The information provided in this submission is true and accurate to the best of my knowledge - I understand that this submission will be made publicly available - I consent to my personal data being processed for the purposes of this planning application

12. SUPPORTING DOCUMENTATION

I enclose the following supporting documentation with this submission:

1. Photographs from my property showing current views and rural character (Appendix A)
-

I trust that An Coimisiún Pleanála will give this objection serious and careful consideration. This is not opposition to renewable energy. This is opposition to a poorly planned, excessively scaled, inappropriately located development that has been progressed without meaningful community engagement or adequate assessment of impacts.

Renewable energy: YES. This project, in this location, at this scale, developed in this way: NO.

I request that An Coimisiún Pleanála refuse this application and require the developer to engage genuinely with the community to find a balanced solution that achieves renewable energy generation while protecting residential amenity and community wellbeing.

Yours faithfully,

J Cottam

James Cottam

14/10/2025

APPENDICES

Appendix A: Photographs from Property

View towards windfarm part A



View towards windfarm part B showing rural characteristics of location



House location showing rural situation





END OF SUBMISSION