

To: The Secretary
An Bord Pleanála
64 Marlborough St
Dublin 1
D01 V902

Re: Proposed Wind Energy Development by Ballinlee Green Energy Ltd. – Observation under Section 37E / Planning & Development Act 2000 (Case Number: PAX91.323780)

Dear Sir/Madam,

I, John Clifford and Mary Clifford, write in our capacity as residents of Crean, Bruff, Co. Limerick, V35TX20. Our home is located within 1km of the proposed development by Ballinlee Green Energy Ltd. Case number 323780. We submit this observation to draw attention to our concerns regarding the proposal and to request that An Bord Pleanála give full consideration to the issues outlined herein.

Firstly, the website of the applicant, Ballinlee Green Energy Limited, states the following:

- 'Ballinlee Green Energy is an innovative Irish renewable energy company based in Adare, Co. Limerick that specialises in the development of renewable energy projects, working with communities from pre-planning to operation, and creating long-lasting local partnerships. The project team has over twenty years development and operational experience.' (<https://ballinleegreenenergy.ie/>)

Ballinlee Green Energy Limited was recently incorporated (August 2024) and is a subsidiary of Greensource Sustainable Developments Limited ('GSDL'). GSDL has 13 subsidiary companies. There is no publically available information showing that this group of companies have completed or commissioned a wind farm development in Ireland. Many of the sister companies of Ballinlee Green Energy Limited have similar applications that are either at planning or appeal stages.

Additionally, research has shown that the ultimate parent company of Ballinlee Green Energy Limited, Temporis Limited, is domiciled in Malta whose largest shareholders are TMF International Pensions Limited (27.43%) and David Timothy Patrick Watson (43.10%). The Temporis Limited website is <https://temporiscapital.com>

We suggest the Bord question the accuracy of the statements on the Ballinlee Green Energy Limited website, as we have concerns with respect to the motivation for this development, whether the project team have the experience claimed and what their track record (if any) is with respect to residents and communities that live in close proximity to any previously completed developments.

Biodiversity:

- We request that the Bord verify whether the baseline ecological surveys are sufficiently current and comprehensive (e.g., relating to bats, birds, protected

flora and fauna, habitats). Any omission may undermine the reliability of the impact assessment.

- Specifically, regarding the Whooper swan which migrates here every year, we have concerns that the specified mitigating factors are not sufficient to protect this species.



- The above picture was taken on the morning of the 16/11/25 while walking along the R516. This clearly shows 5 Whooper swan, they are a common sight here.





- The above 2 photographs were taken on the morning of the 16/11/25. Circled in black is a single Whooper Swan flying in the direction of where T1 and T2 are to be located.
- The land where T1, T2 and T3 are located is subject to flooding every year and sometimes up to 3-6 months of the year. This draws flocks of swans, geese, herons and seagulls. We are significantly concerned about the impact this will have on those populations.



- The above picture was taken on the morning of the 16/11/25, view southwards from the R516 towards where T1 and T2 are proposed to be located.



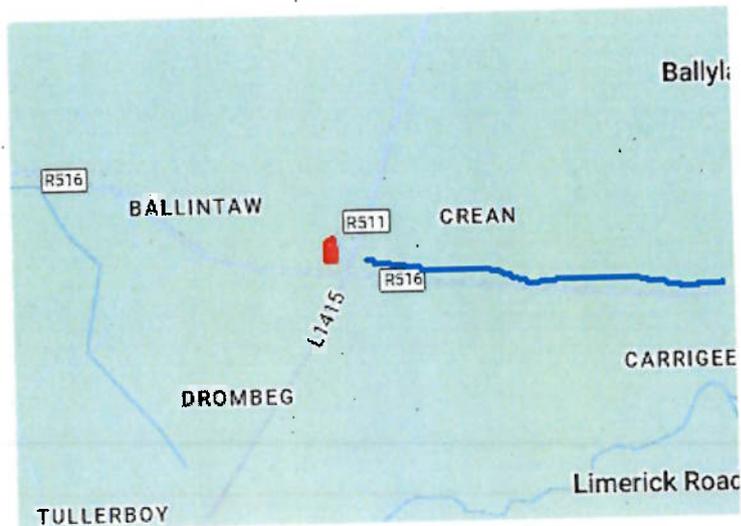
- Above is an aerial view of where T1, T2 and T3 are proposed to be located which is currently flooded.
- Concerns about the destruction of hedgerows, which would lead to the loss of multiple habitats for many species of flora and fauna, affecting nesting and roosting areas.
- The Bord should require robust, legally enforceable conditions, ensuring long-term monitoring and adaptive management should unforeseen impacts arise.

Land and soils:

- Significant concern about the impact of excavation will have on flooding levels in our local area. Specifically, the area where wind turbines T1, T2 and T3 are proposed to be located. This area experiences regular flooding, especially during the winter months as demonstrated in the above pictures.
- The R516 from House 9 towards Bruff is subject to sinking and the road level becomes uneven very quickly due to subsidence. Road maintenance works are carried out every number of years. We feel the increased traffic at construction and maintenance phase will have a negative effect on this already vulnerable stretch of road.

Water:

- Construction of wind turbines has been known to affect water quality through soil disturbance, run-off and pollution during construction and subsequent maintenance. We would like to highlight concerns related to our local private water scheme, Boherard Group Water scheme, which has been in operation since the 1960s. See picture below.



- The scheme well and pumphouse (marked in red) are located at the junction between the R516, R511 and L1415, approximately 1.25km from the nearest turbine (T1). The water mains pipes run down the R511 and down the R516 (marked blue) to provide water to houses along R516 in the direction of Bruff until Dwelling 9 on Figure 15.3 of the Environmental Impact Assessment report supplied.
- The pumphouse and pipeline are located along the proposed turbine delivery route. We have significant concerns that the HGVs that will be travelling this route will cause extensive damage to the existing network and we ask the Bord, who is responsible for fixing these when that arises?

Air quality:

- We are concerned that during the construction and transportation phases there will be an increase in air pollution, negatively affecting our overall health and wellbeing.
- We reside within 50m of the proposed route for construction vehicles. We are within 870m of T1. We have significant concerns with respect to air pollution from dust and fumes that will impact our respiratory systems. Air pollution from dust and fumes is linked to the development, or worsening of respiratory illnesses such as asthma, Chronic Obstructive Pulmonary Disease (COPD), and pulmonary fibrosis.

Landscape and visuals:

- The area of Cream, Bruff, Co. Limerick, located along the R516, and north of the proposed wind farm development, is one of natural beauty. I (John) have lived here my entire life and enjoyed the visual amenity of our landscape. The proposed construction of 17 giant turbines will negatively impact this.
- The scale of the turbines (tip height 160m) and associated infrastructure (access roads, substations, grid connection) will have a significant visual impact on the local landscape.

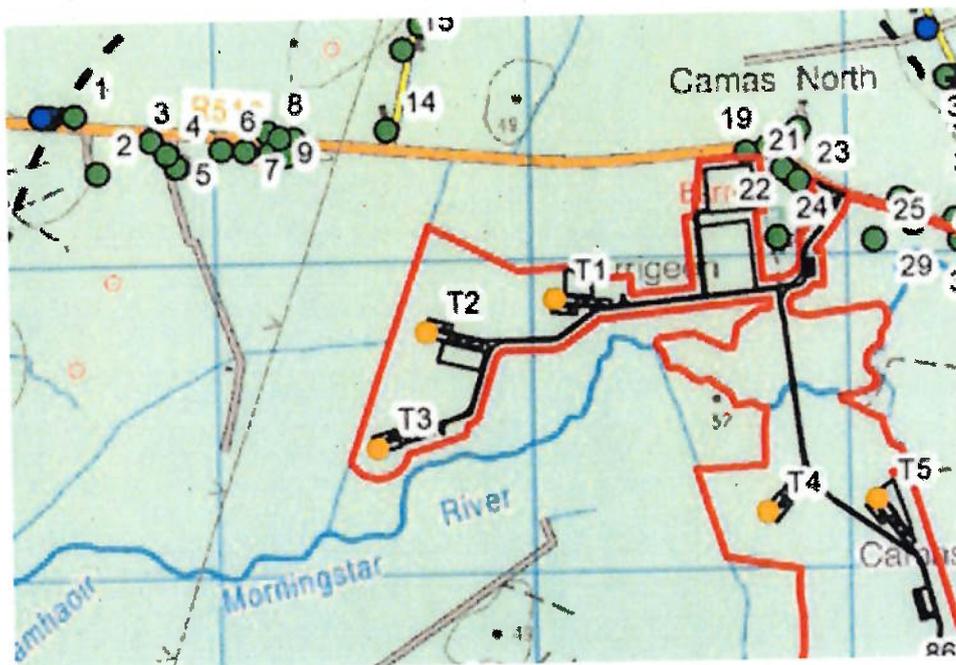
- There are no photomontages from the aspect of our dwelling. The EIAR must show clear photomontages, wireframes and visual impact assessments from key viewpoints. As such, required visualisations are missing. Their absence should weigh against the application.

Noise and vibration:

- We have significant concerns about noise and vibration disturbance during the construction and operating phases of the proposed development. We live in a quiet and peaceful area. We are especially concerned having read about the judgement delivered last year, where Ms. Justice Emily Egan held that noise levels from two-turbine Ballyduff Windfarm at Kilcomb, near Enniscorthy Co. Wexford, amounted to an unreasonable interference with the enjoyment of two residential properties. We chose to continue to live here due to the natural beauty and peace of our surroundings. We are very concerned that should this development proceed, that the associated noise nuisance will have a detrimental effect on the mental and physical health of our family.

Shadow flicker:

- **The 2006 Wind Energy Development guidelines established that shadow-flicker at neighbouring dwellings should not exceed 30 hours per year or 30 minutes per day.**



- Our house is dwelling No. 7. shown above in green.

Table 15-2: Shadow Flicker Modelling Results

| House | Easting | Northing | Theoretical Worst-Case Scenario | | | | Realistic Scenario | |
|-------|---------|----------|---------------------------------|-------------------|---------------------|-------------|---|---|
| | | | Days per year | Max hours per day | Max Minutes per day | Total hours | Realistic Scenario - 29% of Total hours | Realistic Scenario - 29% of Max hours per day |
| 1 | 557525 | 637529 | 44 | 0.45 | 27 | 15.5 | 4.5 | 0.13 |
| 2 | 557593 | 637345 | 113 | 0.5 | 30 | 44.5 | 12.9 | 0.15 |
| 3 | 557761 | 637446 | 87 | 0.55 | 33 | 32.8 | 9.5 | 0.16 |
| 4 | 557812 | 637402 | 121 | 0.58 | 34.8 | 48.1 | 13.9 | 0.17 |
| 5 | 557840 | 637362 | 127 | 0.6 | 36 | 52.9 | 15.3 | 0.17 |
| 6 | 557984 | 637414 | 138 | 0.65 | 39 | 64.5 | 18.7 | 0.19 |
| 7 | 558058 | 637409 | 137 | 0.65 | 39 | 71.7 | 20.8 | 0.19 |
| 8 | 558134 | 637465 | 124 | 0.67 | 40.2 | 64.7 | 18.8 | 0.19 |
| 9 | 558164 | 637448 | 125 | 0.7 | 42 | 67.9 | 19.7 | 0.20 |
| 10 | 558169 | 637448 | 125 | 0.7 | 42 | 67.8 | 19.7 | 0.20 |
| 11 | 558215 | 637443 | 124 | 0.72 | 43.2 | 67.9 | 19.7 | 0.21 |
| 12 | 558140 | 637402 | 134 | 0.71 | 42.6 | 77 | 22.3 | 0.21 |

- As you can see from the table. The maximum days per year affected might be 137 and maximum minutes per day might be 39.
- We believe that the development should not go ahead given the proposal breaches these guidelines for our property, as clearly stated in the application. If the permission goes ahead An Bord Pleanala need to make it a condition of the planning permission that the developers needs to endeavour to commit to install mitigation measures that will eliminate shadow flicker in line with the draft 2019 guidelines.

Traffic and transportation:

- Construction traffic (especially heavy loads, increased wear on local roads, speed/duration) and maintenance traffic need clear management plans including hours of operation, routing, condition of roads, restoration of damage.
- We live on the R516 of the proposed delivery route. It is an already busy road with many school buses travelling everyday to local schools: Bruff, Hospital, Kilmallock, Kilfinane, Croom and St. Josephs in Charelvile.
- My children use the road for amenity purposes as well as getting on their school bus. At present the road is dangerous enough with the already established traffic, not to mind the additional heavy goods vehicles which will be travelling during construction and maintenance phases.
- As stated above the R516 is subject to sinking. The increased traffic from HGVs during construction and maintenance phase will worsen the already vulnerable road which is relied upon for local access to schools and local towns.

Alternatives:

- I submit that the Applicant has not sufficiently examined “reasonable alternatives” as required by the EIA Directive and Irish legislation. The Bord should require a full assessment of alternatives and justification of the chosen scenario. I propose that they look at the Foynes Wind Energy Hub on the Shannon estuary. This area is far more suitable than Ballinlee. The area is home to a community of people and too many homes are impacted.
- Consideration should be given to more isolated areas to build this windfarm and therefore do not impact on so many families, communities which will have a negative impact on human, wildlife and flora health.
- Given the scale of the proposal, we submit that the Bord should consider whether the site is the most appropriate location from an environmental, community and infrastructure viewpoint.

Summary of concerns

In brief, my primary concerns are:

- Potential adverse impact on local biodiversity, habitats and protected species, specifically related to the Whooper Swan- please see photographic evidence of same above.
- Please assess the landscape where T1,2, and 3 are proposed as it is subject to flooding . We propose that T1,2 ad 3 do not get planning permission as this will worsen the flooding of this area. Potentially consider could they be located in an area elsewhere on that landholding.
- Landscape, visual and amenity impacts—particularly our local views, community character and property. Specifically related to shadow-flicker as outlined above exceeds the 2006 guidelines. Again, T1, T2 and T3 not to get planning permission where they are currently proposed or to consider changing the location to another area within that landholding where this would eliminate shadow-flicker on our property.
- As outlined in the Shannon Estuary economic Taskforce, interim report November 2022, alternative offshore developments in the region are more viable and less impactful on local families, communities and bioersity.
- Insufficient mitigation/monitoring commitments, or uncertainty about their adequacy. Especially please consider as outlined above the experience that the developer has in this area.
- Lack of adequate consultation and community engagement

Conclusion :

- While we support the principle of renewable energy development in appropriate locations, I am not convinced that the proposed Ballinlee Wind Farm, in its current form, demonstrates that it will avoid or mitigate significant adverse impacts on biodiversity, landscape, community amenity and local infrastructure. I ask An Bord Pleanála to carefully weigh these concerns in its decision-making and to impose any permission only with the strictest,

enforceable conditions — or alternatively to refuse permission if the impacts cannot be made acceptable.

Yours sincerely,

John Clifford, Mary Clifford.