

Uregare House
Uregare,
Kilmallock
Co. Limerick
V35A662

The Secretary,
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902

Date: 18th Nov 2025

Case Reference: PAX91.323780

Case No: 323780 – Ballinlee Wind Farm

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,

We Joseph & Marie Guiney wish to make a formal objection to the above reference planning applications 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.

Firstly, I wish to state that we are not opposed to renewable energy or wind energy development and fully support Ireland's efforts to meet climate targets.

Our observations relate exclusively to the Ballinlee Wind Farm proposal, which we believe is unsuitable due to its size, its proximity to Bruff, and the extensive residential population nearby. The proposed site lies on low-lying lands within the Golden Vale, overlooking agricultural areas and the town. This location would introduce industrial-scale infrastructure into an otherwise rural and visually sensitive landscape, with significant impacts on local amenity and the character of the area, health and wellbeing of residents and biodiversity

Please see our observations as follows

(1) Noise & Shadow Flicker / Human Health

Observation: Noise, Low-Frequency Sound & Shadow Flicker

Ref The EIAR (Chapter 13 – Noise & Vibration) concludes no significant health effects but provides limited receptor-specific analysis for homes within 2 km and does not assess low-frequency noise or amplitude modulation. This conflicts with the WHO Environmental Noise Guidelines (2018), which link wind turbine noise to sleep disturbance and reduced quality of life. Independent baseline and post-construction monitoring, curtailment protocols, and accessible community reporting are required. My home at Knockuregare Eircode V35A662 is 670m from the nearest turbine. Our family (my wife and two children aged 14 & 12) and I are concerned about how this will impact on our overall health and wellbeing. This will also restrict my mother, who is in poor health, from visiting or staying with us due to same.

At 670 m from our dwelling and 480 m from our farmyard, our family and workers will experience continuous acoustic, visual and light disturbance from T17 and other nearby turbines.

Ref The EIAR (Chapter 15 – Shadow Flicker) Under Table 15-2: Shadow Flicker Modelling Results shows our home No 174 will have 42.3hrs of Shadow Impact.

- The draft Wind Energy Development Guidelines 2019 recommend a minimum 500 m setback and 35–43 dB(A) noise limits, with zero tolerance for shadow flicker at dwellings.
- Construction and operation noise will exceed acceptable limits for rural housing, particularly during night calving and livestock handling.
- Cumulative noise from multiple turbines will interfere with rest, communication and general well-being.
- An Coimisiún Pleanála should impose condition(s) to ensure that no existing dwelling or other affected property will experience shadow flicker as a result of the wind energy development subject of the planning application and the wind energy development shall be installed and operated in accordance with the shadow flicker study submitted to accompany the planning application, including any measures required

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(2) Wildlife & Biodiversity

Observation: Wildlife & Biodiversity (Whooper Swans, Bats, Raptors, Irish Hare, Hedgehog, Foxes, Badgers)

Ref The EIAR (Chapter 6 – Biodiversity) relies on generic datasets and short survey windows; it omits locally recorded Whooper Swans feeding in flooded fields near Carrigeen and provides limited bat corridor mapping along tree lines/watercourses but does not cover my own farm which is in direct proximity to proposed turbines (T17). Cumulative effects with the 110 kV grid

trench (Appendix 2D) are not adequately assessed. This is inconsistent with the Birds and Habitats Directives.

From the application, it reads: "**Table 6-2 provides an overview of the Study Areas applied for each ecological receptor in accordance with appropriate guidance. Table 6-2: Summary of Study Area for Ecological Receptors**

Badger Lands within the landholding boundary and 150 m (minimum) from works area. 150 m is the zone of disturbance for setts arising from construction activities. Smal, 1995; NRA 2006; NRA 2009b".

There are sets within this distance of one of the turbines. If these sets are disturbed, then you will be in breach of The Wildlife Act 1976 (as amended). Recent studies have shown disturbances adjacent to agricultural landscapes have been linked to increased risk of bTB breakdowns in cattle herds (**Barroso et al., 2022**). Any forced movement of badgers due to construction would therefore create a **direct and measurable disease risk** to our pedigree and contract-reared cattle. Should these disturbances give rise to Tuberculosis (bTB) in my herd, then both the operating company and the awarding legislative body will be liable for any and all losses that are incurred to my Pedigree Herd and all other livestock.

Also, within this 150m area of the proposed wind turbines, our lands and boundaries support rich biodiversity including **badgers, pheasants, hares, foxes, bats and owls**. Removal of hedgerows and ditches on adjoining lands to facilitate turbine and cable works will disrupt foraging and sett networks. This will result in habitat loss. These are examples of an irreversible effect, from which recovery is not possible within a reasonable timescale and there is no reasonable chance of action being taken to reverse it.

Additionally, turbine operation and lighting will disturb bird and owl species essential for pest control and soil fertility. Loss of these ecological services undermines sustainable land cultivation and farming practices.

(3) Bat Colonies – Biodiversity

Observation: Ref The EIAR (Chapter 6 Biodiversity) From the application it reads: "**6.2.5 The provision of bat records by Bat Conservation Ireland does not constitute a consultation with Bat Conservation Ireland regarding the Development herein**".

- as can be seen above no Bat survey was undertaken on my old buildings. This has been confirmed through the submitted maps. I have Bats living in an outhouse located within 300m of a proposed wind turbine. Just because there were no notifications to Bat Conservation Ireland does not constitute that there are no Bat habitats in the area. If you ignore this notification, then you will be both liable for a further Habitat Loss and in breach of the EU Habitats Directive. The application states a "desk-based review" was conducted. this is completely insufficient.

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(4) Riparian corridor – Biodiversity

Observation: Ref The EIAR (Chapter 6 Biodiversity): from the application it reads “**6.2.4 Consultation**”

Table 6-4: Biodiversity Consultation conducted to inform the Development

All drainage is to be directed away from the bridge for treatment before returning to the river. The response also mentions river habitat improvement and biodiversity net-gain through restoration of the riparian corridor along the Morningstar River”.

This is both contradictory and untrue. There can be no net gain from first destroying a riparian corridor along the river and then re-instating it. A riparian corridor cannot be re-instated as these corridors take decades to develop naturally. Once destroyed during the construction phase, it is lost. The corridor will be lost and thus a further habitat loss will take place. We fail to find where the Inland Fisheries been notified or consulted on same.

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(5) Wildlife & Biodiversity - Depositing/lowland rivers within the Study Area

Observation: Ref The EIAR (Chapter 6 Biodiversity) - Figure 6-17: FW2 Depositing/lowland rivers within the Study Area (as mapped by the EPA);

Under this map, the watercourse on my land which is bounding 4 turbines (incl No 17) has a watercourse which is not marked on the maps. How is this even possible? This has to be explained. This is a watercourse that feeds the Morning Star and has not been mapped. This needs to be investigated by the Planning Authorities and cannot be missed.

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(6) Wildlife & Biodiversity - Japanese knotweed – Invasive Species

Observation: Ref The EIAR (Chapter 6 Biodiversity)- Japanese knotweed was recorded in the southern section of the Study Area, with two large stands present adjacent to agricultural sheds approximately 50 m from a proposed access track. These stands were cut between when they were first recorded, in August 2023, and when field surveyors were present again in December 2023. During the update survey in July 2025, new growth had been detected within the existing farm access track adjacent to the stand of Japanese knotweed. A list of all invasive plant species recorded within the Study Area and their locations is provided in Table 6-28 and shown on Figure 6-18. Table 6-28: Invasive plant species identified within the Study Area Species

Scientific Name Location (lat, long) Notes Status Japanese Knotweed Reynoutria japonica
52.461869, -8.574126 c. 5x10 m stand adjacent to cattle sheds in Ballinlee High impact invasive
species Third Schedule listed species 52.461655, -8.57395 New growth of two plants in the
existing farm access track High impact invasive species Third Schedule listed species

- As this is an invasive species and located near to a proposed access track, this cannot be permitted.

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(7) Wildlife & Biodiversity - Buzzards:

Observation: Ref The EIAR (Chapter 6 Biodiversity) - Buzzards are a protected species in Ireland under the **Wildlife Acts and the European Communities (Birds and Natural Habitats) Regulations 2011**. All bird species are protected, and animals such as badgers, deer, otters, bats and hares are also protected.

There are a pair of mating Buzzards who have bred on our farm for the past two seasons. Their continued development is strategic for the growth of the species and their young. The success of integrating our farming practices with this species is integral to their survival and prosperity. The erection of wind turbines within the flight path and hunting range of these birds will be detrimental to their existence.

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(8) Water, Private Wells & Drainage

Observation: Ref The EIAR (Chapter 9 – Water) does not map private wells within realistic influence zones of turbine foundations or the 110 kV grid trench. Deep excavations, dewatering and altered field drains can change groundwater pathways and surface flooding. EPA/Geological Survey guidance requires receptor identification, baseline well testing, and a protection/monitoring plan.

My household/farm uses a private well at 640m from the nearest turbine (T17).

Subterranean works can affect well water in Ireland by altering groundwater flow and increasing the risk of contamination from sources like septic tanks, slurry, and animal waste. Construction and excavation can create new pathways for surface pollutants to enter the aquifer, leading to bacterial or chemical contamination, which can cause health issues such as stomach problems or long-term diseases.

Potential effects of subterranean works on well water

- **Contamination pathways:** Construction can disturb the soil and rock, creating new routes for surface pollutants to infiltrate the groundwater supply.
- **Bacterial contamination:** Runoff from agricultural activities, including slurry spreading and animal waste, can enter the well through new pathways, introducing bacteria like *E. coli*. This can cause gastrointestinal illnesses.
- **Chemical contamination:** Fertilizers, pesticides, and other chemicals can be washed into the well, leading to elevated levels of nitrates and other contaminants. High nitrates are particularly dangerous for infants and can cause "blue baby syndrome".
- **Heavy metal contamination:** Construction can also expose and mobilize heavy metals present in the soil and rock, which can lead to long-term health effects like organ damage or cancer if consumed in high amounts.
- **Altered water flow:** Excavation can change the natural direction of groundwater flow, potentially impacting the water source of your well and changing the water's quality or quantity.
- **Increased turbidity and sedimentation:** Construction activities can stir up sediment, causing the water to become cloudy, which is an aesthetic issue and can be a sign of other contaminants being stirred up.

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(9) Traffic & Road Safety

Observation: Traffic & Road Safety (R512 / Local Roads)

Ref The EIAR (Chapter 16 – Traffic & Transportation) outlines generic measures but does not address local peak times (schools, GAA, childcare), pinch-points or safe passing. TII/local standards require a detailed Construction Traffic Management Plan with HGV embargoes (e.g., 08:00–10:00; 12:00–15:30), marshals, pre/post-condition surveys and a repair bond.

In addition, there is now an accident blackspot located on the junction of R512 and L1550 just where the visibility would begin of the proposed turbines (including T17, 13, 14, 15). The nature of light flicker and the visual distraction of wind turbines at this location will greatly exacerbate this accident blackspot and will ultimately lead to road traffic accidents and possibly further deaths to those that have already occurred at this vantage point.

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(10) Property, Land Use & Amenity (Grid Wayleave)

Observation: Ref The EIAR (Chapter 17 – Material Assets; Appendix 2D) confirms a new 110 kV grid connection (~27.6 km) but does not identify affected land parcels, wayleave widths, or long-term no-build restrictions. High-voltage cables create permanent exclusion strips and operator access rights, affecting family plans to build and reducing land value. Impacts on material assets and land use must be assessed under the EIA Directive. Our family intends to build within 1km of these turbines to continue the intergenerational family farming practices.

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(11) Children's Health & Wellbeing

Observation: Ref The EIAR (Chapter 5 – Population & Human Health) claims no significant health effects but does not identify children or childcare/school receptors or assess specific sensitivity to noise, shadow flicker and construction disturbance. Under the **EIA Directive and Irish childcare frameworks**, children are a vulnerable group requiring dedicated assessment.

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(12) Mental Health & Quality of Life

Observation: The EIAR (Chapter 5 – Population & Human Health) treats human health mainly as physical exposure and omits psychological wellbeing, despite **WHO 2018** guidance linking environmental noise to sleep disturbance, annoyance and reduced quality of life. No assessment of long-term mental health impacts from visual intrusion, flicker or noise has been provided.

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(13) Health & Vulnerable Groups (Autism / Sensory / Down Syndrome)

Observation: Ref The EIAR (Chapter 5 – Population & Human Health) provides no assessment of impacts on neurodivergent individuals or those with sensory sensitivities, who may be particularly affected by noise, low-frequency vibration and shadow flicker. This omission is inconsistent with the EIA Directive's requirement to assess human health comprehensively and the **Equal Status Acts 2000–2018** regarding disproportionate impacts on people with disabilities.

Requested additional action: a specific assessment of effects on neurodivergent and other vulnerable residents, with tailored mitigation.

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(14) Project Splitting (Wind Farm + Grid Connection)

Observation: The wind farm cannot operate without the 110.kV grid connection; they are one functional project. The EIAR (Chapter 17 – Material Assets) treatment risks unlawful project splitting. **Per O’Grianna v An Bord Pleanála [2014] IEHC 632**, the grid connection is an integral part of a wind farm development and must be assessed together with it.

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(15) Public Participation & Access to Information

Observation: We have had difficulty accessing clear, detailed route maps and plain-language explanations, contrary to Aarhus participation principles Further information and improved accessibility should be required before any decision.

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(16) Effects from Rock Blasting

Observation: impact on cattle & infrastructure given proximity to the Turbines

Ref The EIAR (Chapter 8 – Land & Soils) “8.5.1.4 Mitigation Measures for Rock Blasting (if required) • Rock blasting will only take place..... (sic where)...production rates need to be increased to keep up with the construction programme. The Blast Management Plan will be prepared by the appointed contractor prior to the construction phase”.

As can be seen in the above, no assessment of impacts from associated noise or blast impact has been completed or provided as of yet.

Our herd management and calving systems require calm and predictable surroundings. The proposal will expose our animals to prolonged noise, vibration, and construction disturbance, especially during calving and housing periods.

The Environmental Impact Assessment must address the impact of rock blasting for turbine foundations and access roads. Given our proximity of 350m to potential blast sites, vibration and air over-pressure from blasting can:

- cause stress, panic and injury to cattle;
- induce miscarriages in pregnant cows;
- damage sheds and water trough structures and
- pose risks to stored silage pits, slurry tanks and water supply integrity.

There is extensive evidence that sudden vibration and low-frequency noise can trigger anxiety responses in livestock. No mitigation could reasonably protect pedigree stock at this short range.

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(17) Deforestation & Hedgerow Removal

Observation: Ref The EIAR (Chapter 8 – Land and Soils)

8.4.1.6 Effects from Tree Felling

The EIAR fails to provide Reforestation Map to replace the loss of trees due to deforestation including conifer plantation, immature woodland and mixed broadleaved/conifer woodland of approximately 14.4ha in accordance good working practices as outlined **by the Department of Agriculture, Food, and the Marine (DAFM) Standards for Felling and Reforestation (2019)** as referenced in Record of 1st Meeting Page 4 of ASP-320745-24 Pre-application consultation 1st Meeting 25/10/2024

From the application it reads: 8.4.1.6 : 1,900m of hedgerows will be removed.

The removal of hedgerows requires a 1:2 replacement ratio (planting twice the length of the hedge) before removal. Removal of over 500m of hedgerow requires an EIA screening application to the **DAFM**.

- We fail to find evidence that this has been put in place or been conducted yet
- We fail to find evidence of where will the 2,800m (2.8 Km) of replacement hedgerows be planted
- We fail to see where these have been mapped

Hedgerows, trees in a line and drains / ditches are designated as landscape features under Good Agricultural and Environmental Condition (GAEC).

In addition, field boundaries such as hedgerows, stone walls and clay banks are afforded protection under the **Environmental Impact Assessment (Agriculture) Regulations (EIA) S.I. 456 of 2011 (as amended by S.I. No. 142 of 2013 and S.I. No. 407 of 2017)**. Any proposed land restructuring works require screening and approval by the Department of Agriculture, Food and the Marine under the EIA regulations.

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(18) Sterilisation of Land & Impact on Future Generations

Observation: The installation of 160 m turbines within such proximity of our farm at Knockuregare will sterilise parts of our holding for decades.

- The operational period of at least 35 years, and possibly up to 70 years if repowered, would effectively remove our ability to develop or adapt our land use.
- Planning restrictions and setback buffers around turbines will mean our children will be unable to secure planning permission to build homes on the family land
- The constant presence of large industrial structures, noise, and flicker will reduce the appeal for our children to continue farming or living on the land, threatening the continuation of our family enterprise. This contravenes the "Farm Forward: Connecting Generations and Farming for the Future Farm Forward" which is a European Innovation Partnership (EIP) initiative delivered by Ballyhoura Development CLG, designed to help farm families navigate the process of farm succession, diversification, and the long-term sustainability of their farms ref <https://www.limerick.ie/discover/living/limerick-news/ballyhoura-development-launches-new-farm-succession-generational-05/11/2025>

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(19) **Heritage & Archaeology – The War of Independence Sean Wall & East Limerick IRA HQ, Purcell Farm History**

Observation: Ref The EIAR (Chapter 14 – Archeology & Cultural Heritage)

Observation: Our farm at Knockuregare is lands historically associated with Commandant Sean Wall, and witness statements confirm that a dug-out used during the War of Independence existed on our property when it was owned by the Purcell family.

Ref Details of same in can be seen in the following links

[Archaeology of the Irish Revolution in East Limerick](#)

Prof. Joanna Bruck, Aidan Harte, Niall Murray

February 14, 2024

Republican infrastructure - Recording the archaeology of Ireland's War of Independence and Civil War, 1917-1923, across the East Limerick Brigade area.

<https://storymaps.arcgis.com/stories/08c3f8f328e74f73b230ccf0c189ca82>

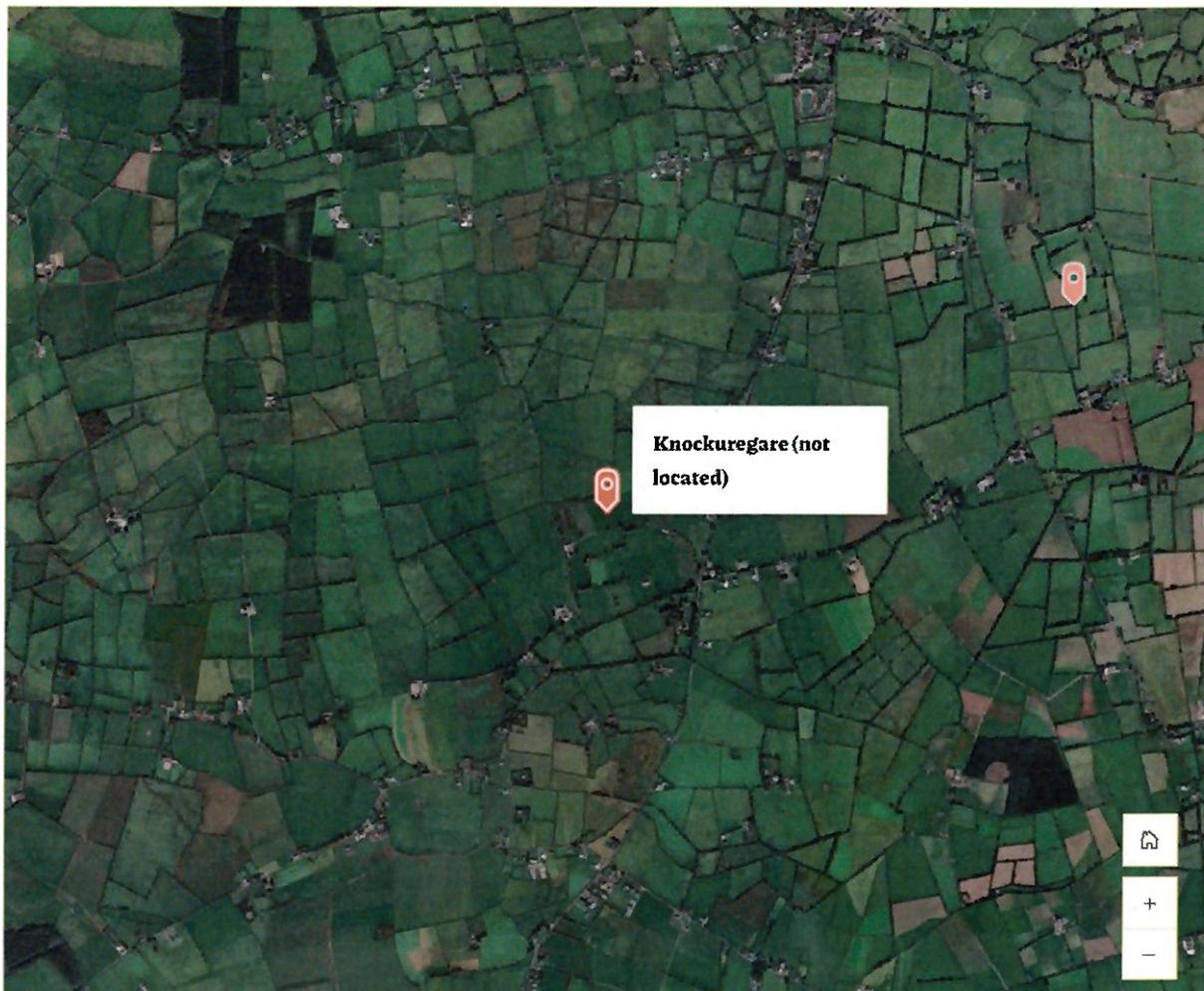
Dugout could not be confirmed without further and intrusive investigation.



 **Knockuregare (not located)**

This Dugout was associated with the Brigadier's Headquarters at Uregare House (owned by W. & K.M. Purcell). Kate Mary Purcell (nee Sheedy) states '*the Brigade Headquarters dug-out where I was working with the Brigade Staff, was situate on our lands and a short distance from our residence*' (MSP34REF12766, 33).

Although during the day, Brigade O/C Seán Wall could work from the house, it is clear that from February 1920 he, and N. O'Dwyer, stayed at the dugout at night (BMH.WS 680, 21). It seems the House became unusable from July 1920, when Kate-Mary Purcell also went on the run and 'all the clerical work at the Brigade Headquarters dug out was done by me ... on a typewriter and Office equipment provided by the Staff for my use there' (MSP34REF12766, 35). Having married while 'on the run', she was admitted in May 1921 to the Infirmary expecting her first child. When news of Seán Wall's death reached her, 'I was obliged in this condition to come back to the dug-out which was the Headquarters of the East Limerick Brigade at the time and had only left a short time when British Forces raided for me... There were also numerous raids carried out on my own home for me and for my husband (MSP34REF12766, 33). It is remembered locally that Kate Mary, and her newborn child, spent the following three months at the Dugout. Therefore, this site would have been the longest continuously occupied Dugout the East Limerick area, at over a year (May 1920 - July 1921).







The dugout is also referenced in the Witness Statements at the following link <https://www.militaryarchives.ie/>

Nick O'Dwyer was the East Limerick Brigade Engineer. *'I went home to get a horse to go across country to Crecora, which I did. I saw de Lacey, got back home, stabled the horse and started to wend my way on foot towards the dug out at Uregare where we stayed, I had to pass through Caherguillamore going to the dug-out and I thought that, having regard to the circumstances under which the dance was held and what I had said about the danger, it was up to me to look in and say good-night.'* WS0680, 19

Nick O'Dwyer – *'Sean Wall thought that I looked so awful that I should not go back to the dug-out. I had been living in the dug-out with him since the previous May and it was not a very healthy place to live.'* WS0680, 19

John McCarthy (Adjutant of the East Limerick Brigade and take over as Commandant from Sean Wall) – *'Another decision also taken at this stage was that circumstances required my setting up a fixed Brigade Headquarters as the effort on my part to fulfil the dual appointment of Brigade*

Adjutant and Column Adjutant became progressively more difficult. In a sense such at headquarters already existed at the Brigade Commander's [p88] dug-out shelter at Uregare, Bruff, but he had become more and more involved in political and Local Government affairs. As Chairman of the County Council, his duties in that capacity in the prevailing circumstances engaged his attention almost whole-time and, as I have already mentioned, it was a sphere for which he had great aptitude and in which he gave magnificent service' WS0883 89

James Maloney (Bruff, 3rd Batt Adjutant) – *'O'Malley liked Bruff Battalion and East Limerick but advocated more fighting. He advised that all men "on the run" sleep in one house and under arms, but Sean Wall had already foreseen this and dug-outs were built or excavated, usually in double banks away from the public eye or paths. Those residing in these "homes" were armed Wall's brigade dug-out was in Liam Purcell's lands at Uregare, Bruff.'* WS1525, 24

While at present no statutory protection can be applied to such sites, the recently enacted Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023, creates 'Prescribed' monuments, in effect giving automatic protections to certain categories of sites (Part 2, Chapter 2, 12. 1). Dugouts are very likely to be amongst the first site-types to be added to this list. statutory protection can be applied to such sites.

The construction and industrialisation of the surrounding landscape, including access roads and turbine foundations, will irreparably damage the historic context and integrity of this setting.

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(20) National Monuments, Heritage and Ethical Considerations

Observation: Ref The EIAR (Chapter 14 – Archelogy & Cultural Heritage)

Observation: On our land there are the following National Monuments. Included in this is an active graveyard.

LI039-046002- : Graveyard : KNOCKUREGARE

LI039-046001- : Church : KNOCKUREGARE

LI039-048----- : Ritual site – St. Margaret's Holy Well : KNOCKUREGARE

These can be seen on the following link:

<https://heritagedata.maps.arcgis.com/apps/webappviewer/index.html?id=0c9eb9575b544081b0d296436d8f60f8>

At the site of the Medieval Church, there is the Knockuregare Graveyard. Within this the oldest

stone dates to 1762. Although older stones have been told of back to the 1600's. The newest is 2023 (Purcell Family).

Knockuregare graveyard is an active site of remembrance and of historical community significance

The turbines (11 × 160 m; 1 × 150 m) would dominate the skyline and significantly alter the graveyard's solemn character.

Respect for the deceased and visiting families is an ethical concern. Noise will affect the tranquillity essential to a cemetery.

We fail to find photomontages and visual simulations from key viewpoints within the graveyard or evidence of engagement with relevant family members and request it be provided



National Monuments structures on our land



LI039-046002- : Graveyard : KNOCKUREGARE

LI039-046002- : Graveyard : KNOCKUREGARE

Description: Site of medieval church of Uregare (LI039-046001-) stood inside roughly square-shaped graveyard (approx. dims. 34m N-S x 34m E-W) enclosed by a post-1700 stone wall with entrance gate at W.

Compiled by: Caimín O'Brien

Date of upload: 21 May 2019

Six-inch First edition: 'Grave Yard'

Six-inch Latest edition: Grave Yard (1924)

ITM Coordinates: 561940 , 633712

Latitude and Longitude: 52.453538 , -8.559959

L1039-046001 - Church - KNOCKBREGARE

Description: Westropp (1904: 5, 423-30) recorded the following details about Uregare: There were two churches (L1040-043----) here so closely connected that we combine their records. Urthegeedy held by Gerald f. Maurice, 1285 (C.S.P.I. vol. III, p. 285); Euegar and the chapel of Urgeedy. 1291; Uregar. 1302, suit of the Bagots as to Muchil-wygedy and Lytel-wygedy. 1317 (Mem. R., vol. II, m. 47); Uregar or Wridus, dedicated to St. Margaret, 20th July 1410; hwygar and Capella Wygedy the rectory belonged to the prioress of Teachmolynd. 1418; Ourgare, an entire rectory. 1531; Owegar. In Patra de Robbie unkaight, alter ffoces country, and Iwergery and Urwyngy. 1536; Peyton, pp. 11, 248; Map, D. S. (A1, 49). The ancient cantred of Iolegar, or Iolegar lay round it. 1290; Sites - The western church, Uregare, was standing in 1826 (Fitzgerald, i., p. 323). It was entirely removed to build the graveyard (L1039-046002-) wall before 1840, and after 1826, when the walls of the old church stood (Fitzgerald, i., p. 323); near it is St. Margaret's Well (L1039-048----). The site of Urgeedy (L1040-043----) lies at some distance to the east in a graveyard, beyond Greenpark, south of the fine old mansion of Ballygreene Castle (L1040-007----).

Compiled by: Cairnín O'Brien

Date of upload: 21 May 2019

References: Westropp, T.J. 1904 5 A survey of the ancient churches of Co. Limerick. Proceedings of the Royal Irish Academy 25C, 327-479

Fitzgerald, P. and McGregor, J.J. 1826 The history, topography and antiquities of the county and city of Limerick. Dublin.

Six-Inch First edition: Site of Uregare Church

Six-Inch Latest edition: Uregare Church (Site of) (1924)

ITM Coordinates: 561928, 633720

Latitude and Longitude: 52.453609, -8.560126

L1039-048---- : Rural site - holy well - KNOCKBREGARE

Description: Ó Danachair (1955, 210) recorded the following details about St Margaret's Well: small open well in the garden of a new cottage. No devotions now, and only a vague tradition that it was a holy well. "There are stations performed at this well for the cure of diseases" OSNB "The people say that no stations are now performed at it" OSL

Compiled by: Cairnín O'Brien

Date of upload: 21 May 2019

References: OSL - Ordnance Survey Letters. Letters written by members of the Ordnance Survey's 'Topographical Department' (T. O'Connor, A. O'Curry, E. Curry, J. O'Donovan and P. O'Keeffe) sent to headquarters from the field (1834-41). MSS in Royal Irish Academy

OSNB - Ordnance Survey Name Books. Pro-forma books arranged by Civil Parish for recording townland and other name forms and compiled in the course of the OS 6-inch survey 1824-1841. The name books also include minor names and incidental references to antiquities. National Archives of Ireland.

Ó Danachair, C. 1955 The Holy Wells of County Limerick. Journal of the Royal Society of Antiquaries of Ireland 85, 193-217

Six-Inch First edition: St Margaret's Well

Six-Inch Latest edition: St Margaret's Well

ITM Coordinates: 562037, 633731

Latitude and Longitude: 52.453715, -8.558534

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(21) Description of the Proposed Development

Observation: Ref EIAR Chapter-02 Description of the Development Under the planning application, it states "2.3 Site Description The proposed development is located in a rural area of east Limerick approximately 18km south of Limerick City and 3km southwest of Bruff. Figure 2-1 outlines the location of the proposed development and indicates the planning application boundary included in the planning application. The area within this boundary is approximately 255.12 ha".

We fail to see how this is a correct statement and believe it to be misleading as the proposed development is not located 3km southwest of Bruff but rather 2.4km from the Thomas Fitzgerald Centre. We find no reference to where this measurement is taken from.

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(22) Telecommunications & Wi-Fi Interference

Observation: Ref Appendix-17B-Telcoms-Impact-Assessment

Our farm security and animal-welfare systems rely on a stable Wi-Fi link between the house and farmyard for calving cameras and remote monitoring.

Rotating turbine blades can obstruct and reflect signals within the **Fresnel zone**, causing intermittent loss of connectivity (Ofcom 2021; ITU-R P.372-13). Any degradation of this system could endanger livestock during calving and compromise farm safety.

A **telecommunications interference assessment** must be carried out for all properties within 1 km, including ours. We need this completed on both our home and our farmyard to ensure continuation of our business. In addition to this, Eir_L2 would overshoot the proposed turbines; however, the clearance distance to the nearest turbine (T17) has been calculated to be just 2.4 m. As this clearance distance is relatively small, it is highly likely that Eir will request that a further set-back clearance be observed to offset the risk of potential interference. Has planning permission been sought for the proposed relocation of telecommunication masts as a result of this disturbance?

“Telecom Operator Consultations beginning in May 2025 were undertaken with telecom network operators to assist in identifying telecommunication infrastructure that could be impacted by proposed wind farm. The operators were requested to raise any concerns they may have regarding impacts to their networks due to the proposed wind farm development. Table 3 lists the telecom operators contacted, and the issues raised by the operators”.

NuWave, our internet service provider was not contacted. NuWave are based in Bruff. Therefore, the consultation process was inadequate.

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(23) Flooding and Drainage Concerns

Observation: Ref The EIAR (Chapter 9 – Water)

There is serious and regular flooding near the lands where the development is proposed. Water often covers the road and spreads across nearby fields after heavy rainfall. This shows that the area is already vulnerable to flooding and that the ground and drainage system cannot handle additional water flow.

Building large turbine foundations, service roads, and cable trenches here could make flooding worse by blocking natural drainage and pushing water towards nearby homes, farms, and

public roads. It could also make the area unsafe for construction or maintenance vehicles, especially during winter storms when floods are common.

Flooding can also carry **polluted runoff, such as soil, concrete, or oil from machinery, into local rivers and streams. This could harm water quality, wildlife habitats, and the wider ecosystem.**

Under Irish and EU law, this issue must be taken very seriously.

- The **Planning System and Flood Risk Management Guidelines for Planning Authorities (Department of Environment, Heritage and Local Government, 2009)** make it clear that developments should be **avoided in areas that flood.**
- These guidelines require a **Site-Specific Flood Risk Assessment (FRA)** whenever development is proposed in or near known flood zones.
- The **Sequential Approach** must be used, meaning that flood-prone lands should be the **last resort** for development.

The proposal also appears to conflict with:

- The **EU Floods Directive (2007/60/EC)**, which requires countries to assess and reduce flood risks, not add to them.
- The **European Communities (Assessment and Management of Flood Risks) Regulations 2010 (S.I. No. 122 of 2010)**, which give this EU directive force in Irish law.
- The **Limerick County Development Plan 2022–2028**, which says that development on or near flood-prone land must prove—through hydrological studies—that it will **not increase flood risk** anywhere on-site or downstream.

At present, the **Environmental Impact Assessment Report (EIAR)** for this proposal does not show any detailed hydrological or flood risk study for the affected area. This is a serious omission.

Under the **EPA Guidelines for Environmental Impact Assessment Reports (2022)** and **S.I. No. 296 of 2018 (EIA Regulations)**, all developments must include evidence-based assessments of flood risk and demonstrate how flooding will be managed or avoided.

Without a full flood risk assessment, the proposal **fails to meet the legal and environmental standards** set by both Irish and EU law. Approving such a development in an already flood-prone area would be unsafe, unsustainable, and contrary to the public interest.

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(24) Underground Grid-Connection Cable

Observation: Ref The EIAR (Chapter 3 – Civil Engineering)

Regarding the Underground Grid-Connection Cable our concerns are as follows

- (i) **Road Safety During Cable-Laying Works:** Continuous single-lane closures with temporary traffic signals will limit visibility and shorten the distance available for emergency braking. Dust, loose stones, and uneven temporary surfaces also create hazards for people walking or cycling. The EIAR does not offer sufficient detail on surface conditions, signage arrangements, or how long temporary reinstatement will remain in place.
- (ii) **Emergency-Services Access and Response Times:** Emergency services, including ambulance and fire response units, depend on the R512/R516 corridor to access Kilmallock, Bruree, and Limerick. Any delay along this route, even of short duration, has the potential to compromise life-saving response times.
- (iii) **Duration and Phasing of Works:** I travel this road daily for work, and any uncertainty about the duration of construction on each section could significantly disrupt my commute. Clear information on phasing and reinstatement is essential for planning and safety.

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

(25) Property Devaluation

Observation: Should Planning Permission be granted for these Wind Turbines it will significantly devalue my home given these turbines will dominate the landscape, obstruct views, and alter the character of the surrounding area, reducing the aesthetic and rural appeal of my home. In addition, noise, shadow flicker, and health concerns associated with turbines will make my home less desirable to potential buyers. The combination of these factors will significantly impact market demand and value of my property. Furthermore, there is no provision for compensation provided for same

Requested Outcome:

- Refusal; or
- Further information and (or) binding conditions as outlined.

In conclusion we trust that An Coimisiún Pleanála will investigate of our observations included in this submission in good faith and respectfully request that REFUSE this application on the grounds set out above

Kind Regards,

Joseph (Joe) Guiney

Marie Guiney

Supporting Documentation

- **Appendix A - Letter Aidan Harte Munster Archaeology**
- **Appendix B - Photos from our home V35A662**

- **Appendix A - Letter Aidan Harte Munster Archaeology**

MUNSTER ARCHAEOLOGY



Baile na mBrabhach
Indreabhán
Contae na Gaillimhe
H91 X90E

29th October 2025

To Whom It Concerns,

I would like to highlight the profound importance of the Bruff area, and in particular the lands at Knockuregare, in relation to the War of Independence. I was part of a recent survey of archaeological remains relating to the revolutionary period (UCD led project funded by the Research Council of Ireland). This project discovered and recorded over 200 sites of national and regional importance and is currently in the process of being published.

In the meantime, I ask all to be cognisant of the significance of such sites. The Purcell's of Uregare House (Knockuregare) were central to Ireland's fight for independence – William Purcell was Captain of the Bruff Company IRA, while more significantly Kate-Mary Purcell was assistant to the East Limerick Brigade Commandant, Seán Wall. As such, the farm at Knockuregare was IRA Bridgáe H.Q., and more specifically a dugout that was on the lands. This dugout not only acted as H.Q. (storing documents and people) but was occupied longer than any other dugout recorded in East Limerick. To date, it has not been located. Furthermore, at Ballinlee South townland, just over 1km

further west, a second dugout was used in the War of Independence and Irish Civil War. Searches on the ground for the latter were also unsuccessful, but these sites are critical to our understanding and appreciation of the Irish revolutionary period.

During the Truce, a training camp was held at Castle Ivers (Tullerboy townland) c. 5km to the northwest, by the 3rd Battalion East Limerick IRA. Again, the ephemeral nature of such events means it is not widely considered. Bruff – Bruree – Kilmallock formed a region where the last, and most prolonged, phase of conventional warfare took place in the Irish Civil War, in July-August 1922. As such there were numerous engagements recorded, but with detail often lacking, and so there is a high potential for evidence of intense fighting between National Army and Anti-Treaty IRA factions from this time.

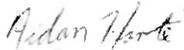
While at present no statutory protection can be applied to such sites, the recently

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enacted *Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023*, creates 'Prescribed' monuments, in effect giving automatic protections to certain categories of sites (*Part 2, Chapter 2, 12. 1*). Dugouts are very likely to be amongst the first site-types to be added to this list.

The actions of the East Limerick Bridgae IRA, and the subsequent Civil War actions in the Bruff area, were pivotal in the creation of the Irish State. I sincerely hope that you consider the above information as an insightful assistance in any deliberations regarding this area of Co. Limerick.

Le meas,


Aidan Harte
BA MA MSc MIAI MCHA MCSFS
Licensed Forensic Archaeologist

Contact: (087) 2963795, info@munsterarchaeology.ie, or www.munsterarchaeology.ie

- **Appendix B - Photos from our home V35A662**



Photo - 23° due Northeast – frontal view of our home. T 14,15,16 and 17 all visible from this vantage point.



Photo - 0° due North of our home. T 11,12,13 and 17 all visible from this vantage point.



Photo - 0° due North of our home. T 11,12,13 and 17 all visible from this vantage point and in this instance T17 directly in line with light flicker interfering with our living space.



Photo - 0° due North of our home. T 11,12,13 and 17 all visible from this vantage point.



Photo - 0° due North of our home. T 11,12,13 and 17 all visible from this vantage point.



Photo - 0° due North of our home. T 11,12,13 and 17 all visible from this vantage point.



Photo - 0° due North of our home. T 11,12,13,14 and 17 all visible from this vantage point (located near to Knockuregare Graveyard).



Photo - 260° due West of our home. T 8,9,11,12, 16 all visible from this vantage point.



Photo - 325° due Northwest of our home. T 13, 14 and 15 all visible from this vantage point.



Photo - 325° due Northwest of our home. T 14 and 15 all visible from this vantage point.

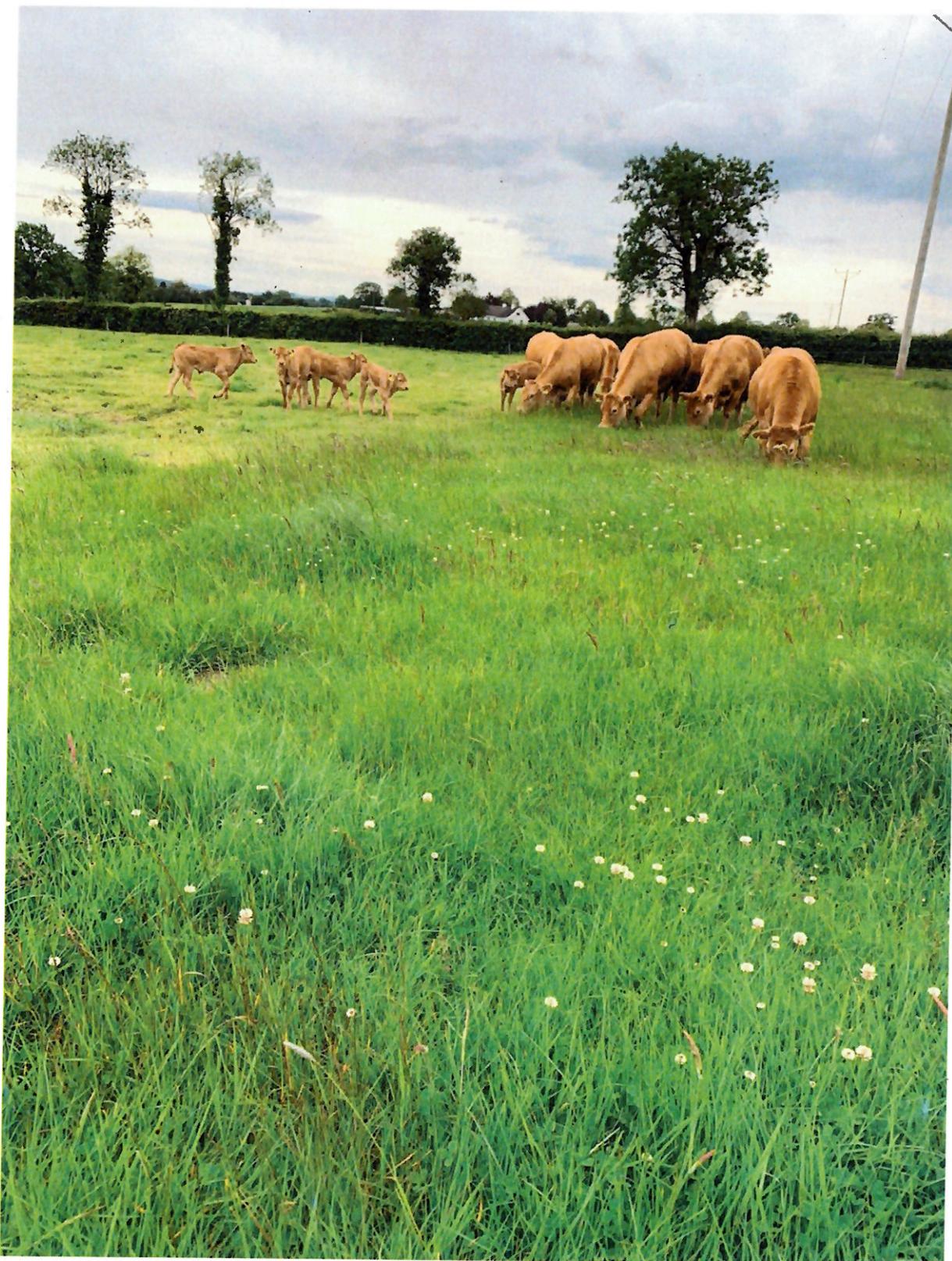


Photo – Pedigree Limousin Herd (sample)



Photo – Biodiversity on farm – Avian life



Photo – Biodiversity on farm – Irish hare (*Lepus timidus hibernicus*)



Photo – Biodiversity on farm – Irish hare (*Lepus timidus hibernicus*)



Photo – Biodiversity on farm – Fox



Photo - Landscape photo of the trajectory of the farming land to the rear of our home