

Ballinrea  
Bruff  
Co Limerick  
V35X674

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

**Case reference: PAX91.323780**

**Date:** 17/ 11/ 2025

**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.**

To Whom It May Concern,

I Karol O' Regan, write in connection with the above listed planning application at Ballincurra, Ballingayrou, Ballinlee North & South, Ballinrea, Ballyreesode, Camas North & South, Carrigeen, Knockuregare, Ballybane and other townlands in County Limerick.

I wish to voice my objection to this development and ask that the Board refuse planning permission.

My request is based on a number of reasons which are outlined below.

1. Proximity of 17 industrial scale wind turbines & associated works relative to my home and the potential health implications as a result.
2. Extended construction works and its potential impacts.
3. Biodiversity deterioration to protected species within our community.
4. Desolation of our Golden Vale landscape through an intrusive visual impact assessment.
5. Photo montage assessment
6. Commercial construction inconsistent with Flood Plain topography.
7. Grid Connection route impact.
8. Conclusion

**1. Proximity of 17 industrial scale wind turbines & associated works relative to my home and the potential health implications as a result.**

As shown below, it is clearly evident the proximity with which my family are proposed to be relative to these enormous Wind Turbines.

What are the consequences of living in such close proximity?

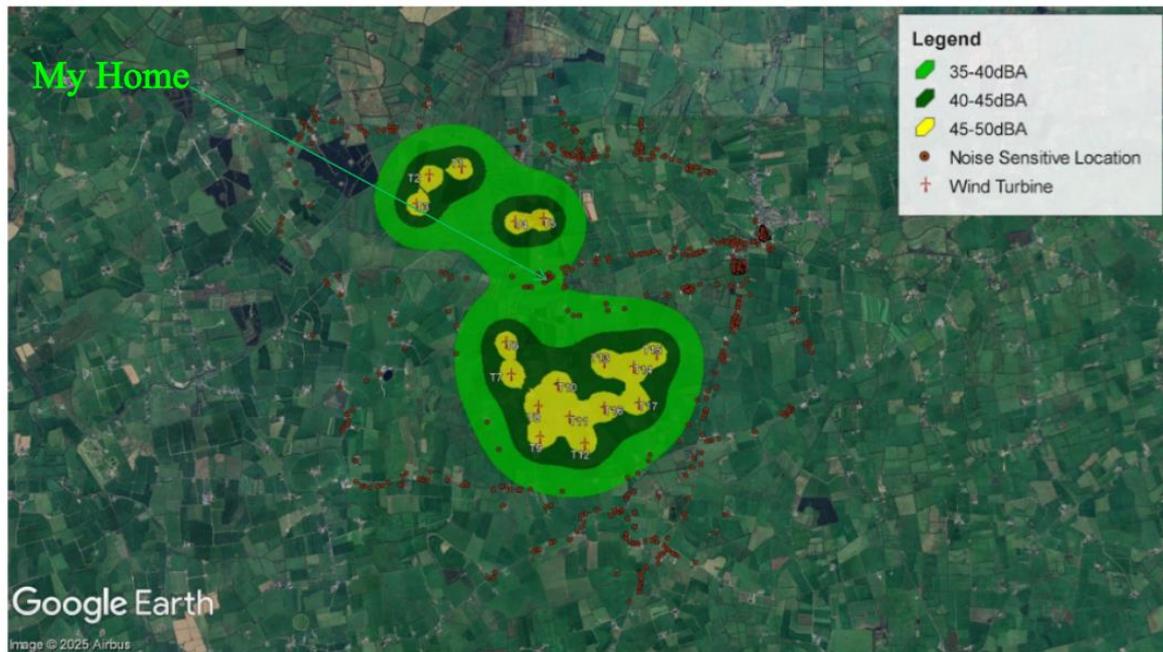
Is it justifiable to subject my family and others to live in such an environment?

What will this do to our current quality of life?

According to the WHO the quality of life is defined as *“an individual's perception of their position in life in the context of the culture and value systems in which they live and in relation to their goals, expectations, standards and concerns”*

**Appendix 13E - Cumulative Colour Noise Contour Plot (average of all wind speeds) at 4m height.**

Cumulative Colour Noise Contour Plot (average of all wind speeds) at 4m height.



To subject me and my family to live in such an environment would constitute a contradiction in terms of what I consider appropriate conditions to sustain a balanced life, with the fundamental principles of well-being an essential component. Those fundamental principles being “*Emotional, physical, social, spiritual, intellectual, and environmental*”

Coupled with the inappropriate proximity of these turbines is the irrefutable science that these machines produce acoustic conditions incompatible with the core principles of wellbeing.

This has never been more prevalent and is now becoming more than just “anecdotal stories” about audible noise produced but also infrasound and low frequency noise.

I will not be discussing in depth all elements of acoustic production by Industrial Wind Turbines but rather pointing to acknowledged consequences and/or research pertaining to IFLN (Infrasound & Low Frequency Noise).

### **Irish Case Law re: audible noise and associated impacts.**

- **Webster & Anor v Meenacloghspar [Wind] Ltd; Shorten & Anor v Meenacloghspar [Wind] Ltd**

Court case in 2025 resulting in combined awards of **just over €300,000** to the four plaintiffs for nuisance and associated property devaluation.

The Irish Times and Irish Examiner both report it as part of the **first** private nuisance claims from wind turbine noise to run in Ireland (and even the UK).

- **Byrne & Moorhead v ABO Energy Ireland Ltd & Ors [2025] IEHC 330**

On **5 June 2025**, Quinn J held that prolonged **wind-turbine noise (and shadow flicker)** amounted to **private nuisance**, granted a **permanent injunction** shutting down **three turbines**, and awarded the couple **annualised general damages** plus **aggravated damages**.

### **Why is this important?**

This acknowledgement by the Irish judicial system recognises the fact that Industrial Wind Turbines **DO** cause impairment to a persons enjoyment of their home, their wellbeing and ultimately the quality of their life.

Can it be stated that the same won't happen to my home, my family or the community as a whole?

### **What about Infrasound & Low Frequency Noise?**

It is a scientific fact that infrasound is generated both naturally and artificially by man-made processes/machinery.

This is also inclusive of Wind Turbines and research into this field is not new.

Academic researchers such as professor Mariana Alves-Pereira, Dr Ursula Bellut-Staeck, Professor Ken Mattsson and others have spent many years researching these fields.

According to Dr Bellut-Staeck *“For the first time, the symptomatology of chronically infrasound exposed humans and animals can be classified pathophysiologically in a coherent hypothesis. This was made possible by the progress in knowledge of endothelial mechano-transduction, essential as vascular function of vital character in response to mechanical forces”*

[Impairment of the Endothelium and Disorder of Microcirculation in Humans and Animals Exposed to Infrasound due to Irregular Mechano-Transduction](#)

According to Professor Mattsson in relation to this planning application *“Regarding the infrasound section in the report you mentioned, I can say right away that it contains several inaccuracies. Infrasound levels from modern wind turbines are indeed high—as I demonstrated in Copenhagen—significantly above background levels. Ground vibrations from turbines can propagate over distances of at least 15 km (Rayleigh waves), which is well documented in the scientific literature. It’s also concerning that the report references outdated research, given that recent studies clearly show that even inaudible infrasound can affect both brain activity and blood pressure.”*

I would encourage the board to watch this presentation by Professor Ken Mattson - <https://youtu.be/nDwsd32SDEY?si=lc2STYNvGbsuGR7s> **which** details the scientific research and results of same.

Coupled with this presentation and the November 2025 publication of his scientific research into infrasound, it is clear and scientifically evidential that infrasound travels and penetrates all before it over many kilometres. [Efficient finite difference modeling of infrasound propagation in realistic 3D domains: Validation with wind turbine measurements - ScienceDirect](#)

The simple conclusion is that Wind Turbines are not appropriate to be built in such close proximity to people and such a rich biodiverse environment.

## **2. Extended construction works and its potential impacts.**

A development of this size and complexity would inevitably require an enormous amount of construction and as such, disruption to our daily lives, increased road traffic, excessive dust and noise and an overall impediment to our lives and livelihoods

### **I would ask the board to consider the following:**

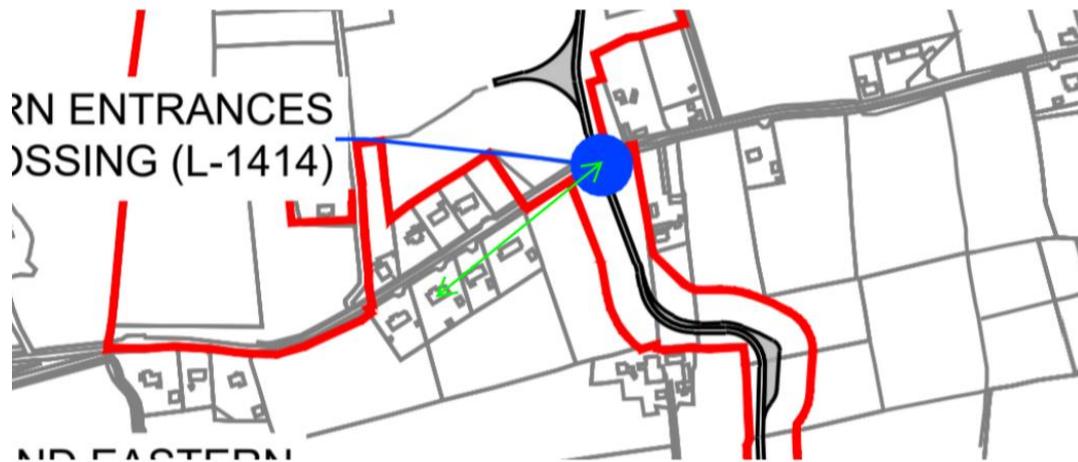
Dual entrances on the L1414, identified as No.4 & No.5 on the planning application drawings, an approx. 160mtrs from my home where 100s of HGVs will traverse for an extended period of time.

Given projected operational times from 7am to 7pm , I find this highly concerning as this is the predominant direction of travel that my family use for school runs, travel to work etc.

Not only this but it effectively removes the opportunity to consider safe walking/running and cycling routes for our family.

I am very familiar with construction vehicles of this nature and the impacts they have both on the ground and the excessive & loud noise as a result of constant movement.

This does not even consider the machinery required to manufacture the access roads, hedgerow removals, pile driving equipment, steelworks etc.



Site entrances No.4 & No.5 approx 175m from my home.

### **3. Biodiversity deterioration to protected species within our community.**

It is without doubt that a project of this scale will result in either the direct loss or displacement of many protected species in our local environment.

Any proposed mitigations are at best hopeful without any assurances of protection for said species.

It is taken for granted that when one lives in a quite rural area, the benefit bestowed upon us is the enjoyment of listening and watching species of all shapes and sizes enjoying their safe and nurturing environment.

This will be forever removed if this application is approved.

Creatures such as the Whooper Swans, Otters, Badgers, Bats, Foxes, horses and our own pets will no longer have the freedom to enjoy the countryside in its natural form.

I encourage the board to scrutinize the applicants planning application and mitigation measures and question the viability of:

- A) Relocating Whooper Swans to a management field that they have never foraged in before.
- B) The implications of Badger sett destruction and the effects this will have on their social environment and presence to remain in the area.
- C) Disturbance of Otters in the morning star river and the potential for permanent displacement.
- D) The potential for Bat roosts destruction and bat fatalities. The acknowledgement of **Lesser Horseshoe Bat** detection in the study area warrants serious attention by the board.
- E) Red Squirrel omission from the applicant's survey results. Stating the Red Squirrel is not in the area is quite simply false, the red squirrel is very often scene is many areas surrounding the study area meaning a healthy occupancy of this species in the area.
- F) Protected bird species across **all** of the study area...



E.g. Snipe pictured in my garden.

According to **Birds of conservation concern in Ireland 2020-2026:**

*Snipe Gallinago gallinago* is now **Red-listed** with severe declines in its breeding and wintering populations

There are many other Amber/Red listed species in this area that depend on the both the natural flood plain and biodiverse agricultural farmland.

Installing Wind Turbines in this area poses too great a risk to their survival and as such this planning application should not be granted.

#### **4. Desolation of our Golden Vale landscape.**

Our Golden Vale landscape is a renowned feature of Southeast Limerick and is a landscape that connects us a population to our history. I would argue that building 17 huge Wind Turbines will forever destroy the enjoyment of this landscape for me, my family and our community.

Not only this however, but in doing so would surely be in breach of the Landscape convention formerly known as the European Landscape Convention.

Over the years, it has encouraged communities and governments to work together to plan and manage their landscapes in sustainable and inclusive ways.

The applicants request to build 17 (16 x 160m & 1 x 150m) Wind Turbines in this area is wholly misaligned with this concept of co-operative landscape management.

The Council of Europe adopted its Strategy on the Environment (2025–2030) reflecting its commitment to a forward-looking, holistic vision that aligns human rights, democracy, and the rule of law with environmental protection. An **Action Plan** lists the first activities undertaken to ensure its effective implementation.

- **Integrating human rights considerations in environment-related strategies, instruments, legislation, policies and actions, and vice versa.**
- **Strengthening good democratic governance in environmental matters.**
- **Supporting and protecting environmental Human Rights Defenders, Environmental Defenders and Whistle blowers.**
- **Preventing and prosecuting environment-related crimes.**

- **Protecting wildlife, ecosystems, habitats, and landscapes**

I would suggest that the above does not align with Industrialisation of our local landscape.

### **What does our landscape look like?**



Golden Vale Drive on the L1414.



Overlooking Ballinlee



KnockTwo Hillfort (only 900mtrs from T17)

In additional to the impairment of such landscapes, we must also consider the loss of the nocturnal side of landscape enjoyment and protection.

For people like me who enjoy photography and wish to avail of our dark skies, we will no longer achieve the same level of perspective as we do now.

In particular, the views from the viewing point of Lough Gur (a protected wildfowl sanctuary) are a reason why so many residents and tourists frequent this ancient and historical site.

The dark skies achieved in Lough Gur provide excellent opportunities for people with interests in astronomy, astrophotography etc to immerse themselves in those hobbies without external lighting to spoil their recreation.

Images such as the below would not carry the same effect if 17 turbine aviation lights are on display in the near background.



Lough Gur Astrophotography



Ballinrea Astrophotography



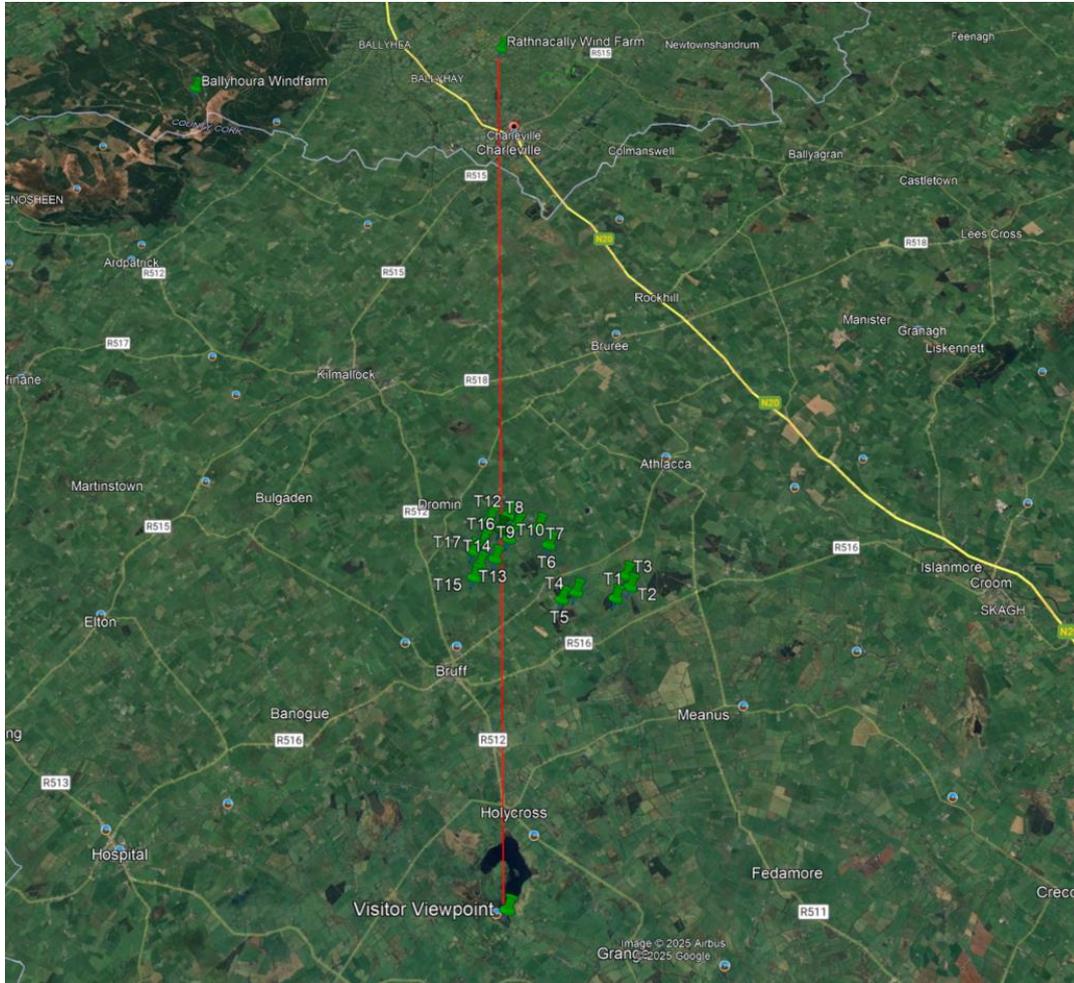


Note below the VP19 position chosen by the applicant **Vs** the Lough Gur Visitor Viewpoint



**I would ask the question:** Why did the applicant chose this VP19 instead of the actual viewpoint for this area?

Is it because the viewer will be subject to the following?



Note the Rathnacally Wind Farm located 25Km S/SE of this viewpoint.

The proposed Ballinlee Windfarm will be 3.5 times closer to Lough Gur and have a much more imposing presence.

Bearing in mind also that the Rathnacally windfarm which is clearly visible from Lough Gur has only 2 turbines with a turbine diameter of 114m Vs the 17 turbines proposed for Ballinlee which predominantly have turbine diameters of 136m.





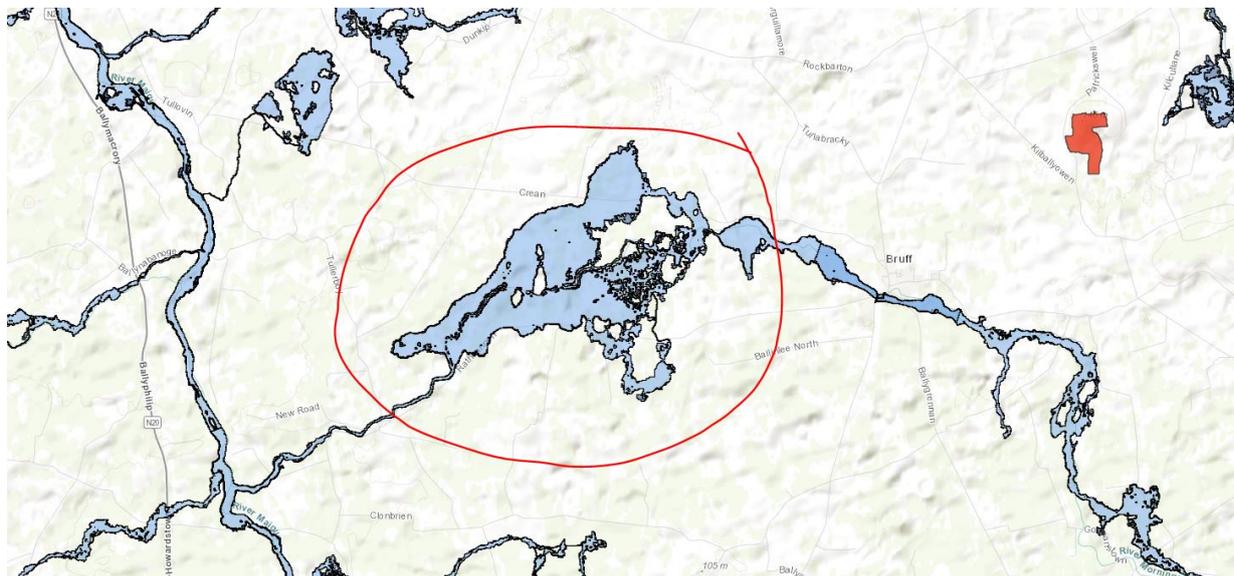
The above are just two examples of many that in my opinion fail to reasonably demonstrate the accuracy of the “**as-built**” turbine presentation.

## 6. Commercial construction inconsistent with Flood Plain topography.

It is very well known both locally and nationally that the northern section of the proposed development area is a natural floodplain.

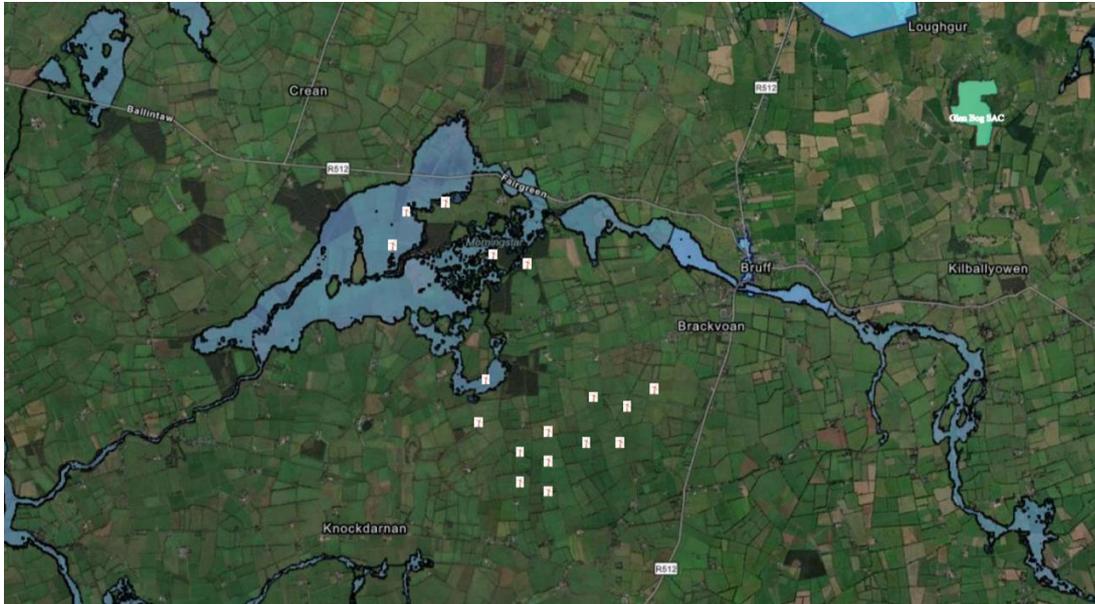
This information is publicly accessible via <https://www.floodinfo.ie/map/floodmaps/> and [LCC County Development Plan](#).

Within these platforms it is clear to see the extent of the flooding potential for this area as shown below:



The applicant has as part of the turbine layout design included turbines located within such an area of such flooding potential.

Image below is an extrapolation of the applicants turbine locations layered onto the LCCC county development map.



**Does such flooding actually occur?**

**Answer:** Yes

Picture taken 13/11/2025



This is clear and unequivocal evidence of flooding that occurs very regularly in this area. It is a result of the poor drainage capabilities of the soil and as such promotes surface water transits to the Morning Star River through to adjacent tributaries and ditches etc.

Below is a representation of turbines T1 – T3 plotted into an area that suffers from regular flooding.



The above photograph, taken on 13/1//2025 after a routine flood of the Morning Star, shows extensive standing water across the fields where turbines T1–T3 are proposed. This demonstrates that the proposed turbine locations lie within a functional floodplain. Locating turbines, crane hardstands and access tracks within this flooded area is inconsistent with the objective of avoiding new development in floodplains, and raises concerns about displacement of floodwater, increased flood risk to neighbouring lands, and safe access during flood events.

### **Is this a localised issue?**

Considering the hydrological linkage between the surface water - -Morning Star River - - Maigne River - - River Shannon & River Fergus SPAs, it can most certainly not be deemed a localised issue.

Consider the pollutant runoff from both construction spillages, diesel, hydrocarbons, operational oil leakage etc and entering into the Morning Star. It will most certainly

compromise the biodiversity integrity of the Morning Star and subsequently downstream into SPA territory.

**Does the Morning Star have the capability to carry such biohazards?**

In flooding events, most certainly.



Morning Star River at Bruff East of the development area.

52°28'30.23"N

52°27'31.50"N



Morning Star River at Athlacca Bridge West of the development area.

8°33'8.12"W

8°39'3.71"W

This is not a minor tributary but a heavy load carrying capacity river.

## **7. Grid Connection route impact.**

The grid connection route (GCR) as advised by the applicant will be approx. 24.4km (public roads) 27.6km including the internal WF cable routes.

This is an extraordinary length of cable to connect the WF substation through to the Killonan site and as such will require an enormous amount of resources and time to accomplish this work. A cable route of this length will require public road trenching,

HDD drilling to bypass bridges (Camogue River Bridge) and also there will be a requirement to install approx. 32 x Cable Joint Bays along the public road.

According to Appendix 2D section 3.2.3.3 Joint Bay it states “**110 kV joint bays typically have a width of 2.0m and a length of 6.0m, however additional working space is required to allow cable pulling. It’s common to allow 12.0m at either end of the joint bay thus increasing the total length to 30.0m**”

Installing Joint Bays of this size and this quantity will herald in an unprecedented level of disruption to not only the Bruff community but it will have far reaching consequences to the commercial sustainability of businesses along the GCR route.

There are in excess of 20 operating businesses along the GCR which under typical rural traffic circumstances, have to contend with council repair works, multi seasonal farming traffic vehicles, animal crossings etc.

To introduce works of this nature would be immensely disruptive and given the nature of the works required would carry significant public safety concerns.

In addition, certain local roads would be forced to be closed, and it would be impossible to achieve dual lane functionality as seen below.

### **Some questions...**

What would this mean to residents living in this area?

How many residents require home care or daily medical care?

How would emergency services attend the home of someone in an emergency situation with extensive works ongoing?

Would acoustic levels be as such that homeowners would not be disrupted?



Joint Bay No.7 on L-8012. (Image above is for representation purposes only and is not to scale)



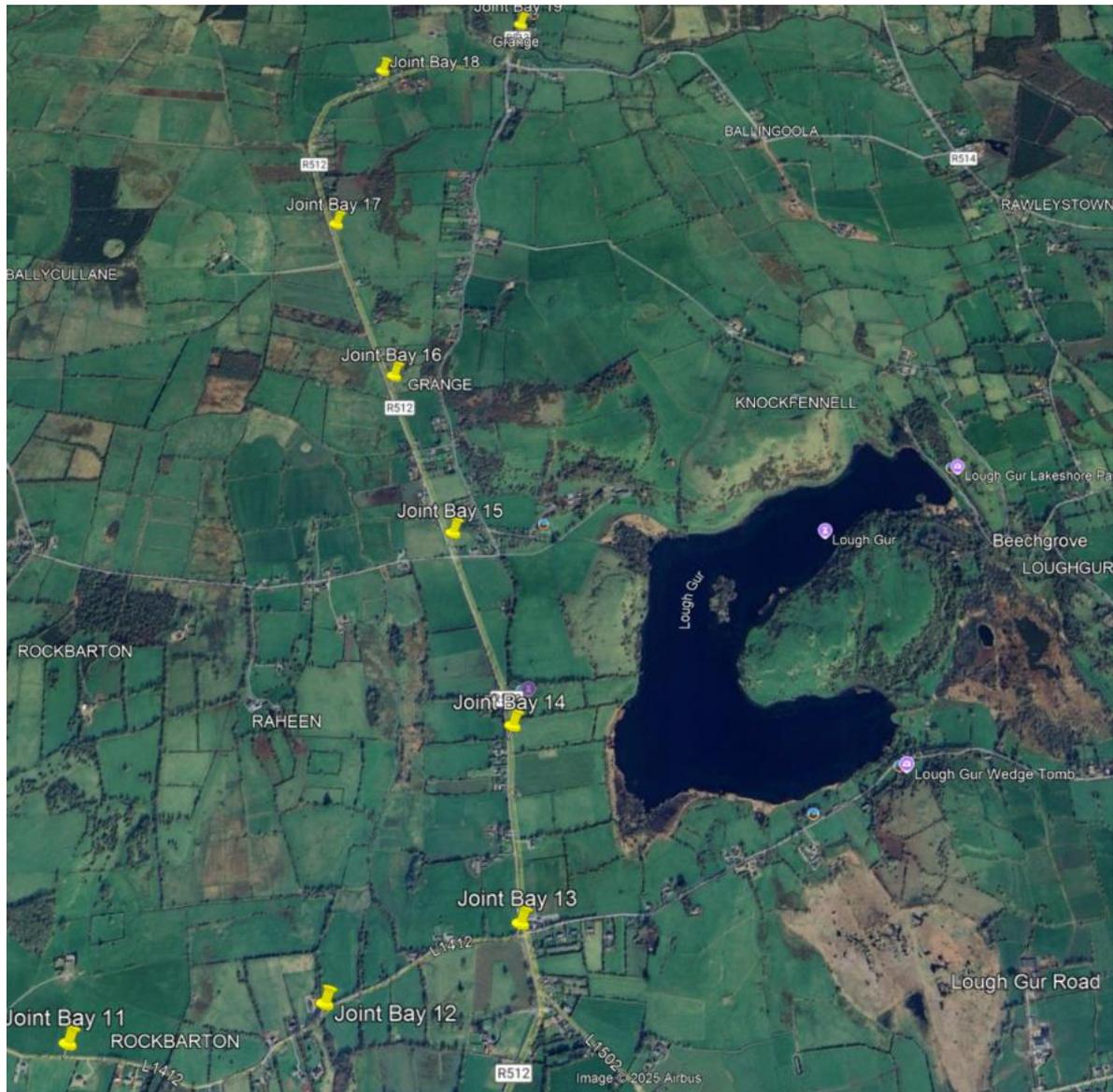
Joint Bay No.8 on L-8012. (Image above is for representation purposes only and is not to scale)

It is clear to see given the Joint Bay description as provided by the applicant that these roads would be impassible for the duration of the works required.

**Does this have an impact of regional roads?**

Below is a close up of the R512 and it's proximity to the wildfowl sanctuary and popular tourist destination Lough Gur.

How will these works affect the tourism trade for this area and those residents who live along local roads linking to the R512?



Note the volume of Joint Bays in proximity to Lough Gur and as such the extent of disruption and possible archaeological sensitivity given the proximity to the Grange Stone Circle as seen below.



Grange Stone Circle is a state-owned National Monument in the care of the Office of Public Works.

The Grange Stone Circle in Limerick is a remarkable symbol of the Bronze Age. This 4,000-year-old circular enclosure, the largest of its kind in Ireland, is composed of 113 contiguous standing stones.



Grange stone circle which attracts large number of tourists annually. [Grange Stone Circle | Heritage Ireland](#)

Conducting extensive road roads with accompanying terrestrial vibrations could have unforeseen impacts on a nationally protected monument.

## **Conclusion**

As demonstrated through a variance of visual representations, I feel it is adequately portrayed that a development of this nature is simply and wholly inappropriately proposed for this area.

Without speaking about legislative breaches and non-compliance with a multitude of appropriate regulations, I sincerely encourage An Coimisiún Pleanálato to exercise stringent due diligence across all facets of this application and without prejudice, conclude that indeed this development is served better in an alternative location, removed from the impact on Human health, Bio-diversity, landscape, commercial business success to name but a few.

Kind Regards,

Karol O' Regan

Ballinrea,

Bruff,

Co. Limerick

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