

Linda McCarthy  
Ballintaw  
Banogue  
Croom  
Co Limerick  
V35 VC58

The Secretary,  
An Coimisiún Pleanála,  
64 Marlborough Street,  
Dublin 1,  
D01 V902  
**Case reference: PAX91.323780**

**Date:** 16/11/2025

**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, Ballingayroure, Ballinlee North & South, Ballinrea, Ballyreesode, Camas North & South, Carrigeen, Knockuregare, Ballybane and other townlands in County Limerick.**

To Whom It May Concern,

I, Linda McCarthy, write in connection with the above listed planning application at Ballincurra, Ballingayroure, Ballinlee North & South, Ballinrea, Ballyreesode, Camas North & South, Carrigeen, Knockuregare, Ballybane and other townlands in County Limerick.

I wish to object strongly to this proposal and ask that the Board refuse planning permission.

Below is a summary of my observations and concerns:

- Communication:

I am an Irish citizen, where the constitution explicitly states that Ireland is a sovereign, independent, democratic state. To be democratic is defined as: *organised in a fair way in which everyone has the right to join in making decisions and have their opinions heard.*

There has been a complete lack of engagement from Ballinlee Green Energy, with no communication in relation to this planning application until the site notice appeared at both sides of Tullovin Bridge and other local locations. I believe this was a deliberate omission by Ballinlee Green Energy not to engage with the local communities in a public manner. The Tullovin access site and HGV construction traffic as well as the windfarm itself, along with the main access point to the construction sites on the R516 is an important aspect of this development, therefore engagement at local level should have been deemed a necessity. I believe this is a breach of my democratic right and that of our communities, as well as the Aarhus Convention.

The Aarhus Convention, to which Ireland is a signatory, underscores the importance of public participation in environmental decision-making. Article 7 of this convention grants us the right

to be informed, to participate in decision-making processes, and to have access to justice in environmental matters. These rights are not to be taken lightly; they are fundamental to the democratic principles upon which our society is built.

We have been deprived of our rights to be active participants in a process that profoundly impacts our lives and environment. By failing to engage our communities, Ballinlee Green Energy has disregarded not only our rights but also the spirit of transparency and accountability that the Aarhus Convention seeks to promote. Our concerns and objections cannot be disregarded without fair and due process for all.

The imbalance in participation is wholly unfair. The developer has ample time to compile and submit their application, yet community members are afforded only a brief window to review, comprehend, and respond to a complex strategic infrastructure development proposal.

The planning application advises of various communication measures that will be used to communicate information to the households along the local haul route roads and along the grid connection public roads:

However, the measures outlined lack depth and substance, and given the developer's limited engagement with local communities to date, it is difficult to have confidence in any of the proposed communication methods.

- Safety Risks

The following below in my opinion highlights significant safety risks that seem to have been excluded from the planning application, potentially endangering the lives of local residents.

The planning application advises:

*The aim of the Traffic Management Plan is to provide a safe working environment for construction workers and efficient passage of traffic and other road users through the proposed development site and associated works. The procedures to be implemented by the contractor will include the provision of facilities for the safe passage of pedestrian and vehicular traffic and measures to separate them from the construction work.*

There is a significant omission in the documentation, as the safety of all road users must be treated as a priority. While developers and contractors are legally required to provide a safe working environment for construction personnel, the current statement fails to extend this obligation to all other road users. As a result, the principle of preparing a traffic management plan in utmost good faith is not being upheld.

The R516 and R512 are primarily rural roads used by vehicles, pedestrians, runners, and cyclists. These roads do not contain designated pedestrian, cycling, or running areas, making it impossible to separate vulnerable road users from construction traffic and ensure their safe passage. Notably, cyclists are entirely absent from the traffic management plan. Walking, running and cycling are daily or weekly activities for local residents, and both roads are essential access routes to several recreational loops. Without clear measures to address these realities, the safety of pedestrians and cyclists is being placed at undue risk.

These risks escalate further on the L-roads surrounding the construction traffic and cable-laying routes, where road widths and conditions make the situation even more hazardous.

Churches (Croom / Bruff) There are, on average, three funerals per month at each church, along with numerous other school, social, and family events—such as christenings and weddings—throughout the year.

Croom Church Overflow vehicles from the church car park will park along the roadside. For funerals, the hearse will stop directly outside the church's front entrance on the roadside. In keeping with local tradition, mourners will walk to the nearby graveyard as part of the funeral cortege.

Bruff Church Cars often park on the street immediately surrounding the church, including along the R516, where a pedestrian path is only provided on one side. During funerals, vehicles frequently park on both sides of the R516, further restricting through-access.

There is also an extremely busy medical practice located close to the R516, within the general vicinity of the church. The R516 approach to Bruff is regularly used for parking by people attending this practice, including many elderly and vulnerable members of the community and surrounding areas. No pedestrian crossing is available in this location.

The junction of the R516 and R512 at Bruff presents a high-risk environment for pedestrians who must walk from parking areas along the R516. In addition, a designated bus stop is situated on the town side of this junction, serving a very regular and well-used bus service.

Both church locations lie directly along the proposed construction supplier routes, with no feasible mitigation measures available to address the associated safety risks for pedestrians and vehicles.

Both national schools rely on their respective churches for practice sessions and school-related religious ceremonies.

None of these safety issues are referenced or addressed in the Traffic Management Plan.

- Schools

St Marys Primary School, Croom National School is located on High Street, Skagh, Croom, along the R516. Parking for school access is situated on the R516, where a lollipop lady operates during school start and finish times to assist with pupil crossings. This area also accommodates car drop-offs and collections, as well as school buses.

In addition, a pre-school and after-school facility operates nearby, offering services including a breakfast club for pupils.

Scoil Dean Cussen, Bruff National School is situated on the R512, with parking for school access located directly along this route. The area becomes highly congested at school drop-off and collection times, with significant volumes of both pedestrian and vehicular traffic.

A school bus service operates along the R516 to Scoil Dean Cussen in Bruff. This requires parents and pupils to wait at the roadside for pick-up and drop-off, with pupils having to cross the road in one direction or the other.

Secondary school bus routes for the various secondary schools also run along the R516 and R512, with designated stops on both roads for the many students travelling from these areas.

The below is one school bus dropping students at Bus Stop in Bruff, close to junction with R516 and R512



The planning application acknowledges the presence of schools in both towns and states that construction activity will work around school start times. However, no detailed plan is provided, and given the multiple staggered start and finish times throughout the school day, this approach appears impractical. As a result, the safety risk for students and parents is likely to increase.

*The Irish Constitution recognizes children's rights through Article 42A, which was added in 2015. This article affirms that children have natural and imprescriptible rights, and the State has a duty to protect and vindicate them. Key provisions include making the child's best interests paramount in State interventions concerning their safety and welfare, and the right for a child's views to be heard and considered in court proceedings, taking into account their age and maturity.*

Therefore, on this basis, I object to the planning application, as it poses a serious risk to the safety and welfare of the children and students referenced above during the

construction phase. (This is separate to the potential health risks associated with the turbines for pupils of Scoil Dean Cussen if planning permission was granted)

- Other Town Facilities

Bruff, The Thomas Fitzgerald Centre has become a focal point for the town and surrounding area. It is featured in all Visit Ballyhoura tourist information and attracts many visitors due to its heritage significance and the Kennedy family connection. The Centre hosts a range of events, including talks by international, national, and local guest speakers.

Parking facilities for the Centre are shared with the nearby medical practice, the church, and along the R516. Despite its importance as a key visitor attraction in Bruff, the Traffic Management Plan makes no reference to the Thomas Fitzgerald Centre.

Croom, The Community Centre in Croom provides a wide range of sporting facilities for local residents, clubs, and schools, including indoor soccer, fitness classes, badminton, and more. It serves as a central venue for hosting county, regional, and national sporting competitions. The facilities also accommodate various community events such as craft fairs, bingo nights, and senior citizens' activities.

While some parking is available directly outside the Centre, the majority of parking occurs along the R516. There is also access to soccer facilities located adjacent to the Community Centre.

Again, there are significant safety concerns for both pedestrians and vehicles, and it appears that these issues have been deliberately omitted from the planning application.

The above represent only a few of the many amenities located in both towns.

Below is an access junction between R512 and R516 via Thomas Fitzgerald Centre



#### Croom Development Plan 2022-2026

*Encourage the development of safe and efficient movement and accessibility networks that will cater for the needs of all users and encourage priority for walking and cycling and public transport provision. Future development proposals for new residential, serviced sites, community and recreation and enterprise lands will demonstrate at design stage that consideration of Smarter Travel, mobility and connectivity with the town centre and community infrastructure has been considered;*

*(c) All future development proposal shall incorporate the relevant objectives of the Mid West Area Strategic Plan (MWASP 2011-2030), the Smarter Travel Strategy and the promotion of enhanced public transport facilities and services;*

*(d) Ensure that adequate facilities and access provisions are provided for those with disabilities in the community. The Council will strive to ensure that the provision of such facilities will be in line with current best practice; (e) Improve the efficiency of junctions as identified on land zoning map in the town to enhance the free flow of traffic through the area;*

The construction phase does not acknowledge the impact that the increased volume of HGVs will have on the objectives set out in the Croom Development Plan 2022–2026. During the consultation phase of that plan, parking difficulties were identified as a significant concern for local businesses, particularly in relation to ensuring that elderly and/or vulnerable individuals have access to parking close to essential services such as the pharmacy, grocery store, and post office.

It can reasonably be assumed that this will remain a priority in future Croom Development Plans, as it is essential to supporting the local community, businesses, amenities, and the wider town. However, the planning application includes no assessment of, or mitigation measures for, these issues. Furthermore, there is no evidence or reference to any consultation with businesses in Croom regarding the proposed R516 construction route and its potential impact.

The proposed construction phase is in direct conflict with these objectives and will significantly undermine the relevant aims of the Mid West Area Strategic Plan (MWASP 2011–2030), presenting serious challenges to their achievement.

The Bruff Realm Development Plan advises:

*Tourism Development – It is an objective of the Council to enhance the tourism potential of the village, including the promotion of new tourism products in an environmentally sustainable manner, such as the linkages to JFK ancestry and the JFK Museum and work with relevant stakeholders to encourage new tourism development to be located within the village.*

*The proximity of the village to Lough Gur, one of Ireland’s most important archaeological sites offers further opportunities to residents and visitors alike to the village to enhance and build on the recreational offering of the site. New walkway and cycleway linkages along the old road from Bruff to Lough Gur will be supported in this plan and in the new public realm plan for the village.*

The addition of construction traffic, as outlined in the planning application, will contravene the above objectives of the Bruff Realm Plan and will significantly undermine efforts to promote tourism within the town and its surrounding areas.

- Elderly and Vulnerable:

Our local towns, Croom and Bruff, provide a safe environment—particularly for the elderly and vulnerable members of our community and surrounding areas—to maintain their independence and enjoy essential social interaction. Many rely on daily visits to town for newspapers, groceries, medical services, banking or credit union transactions, the post

office to collect pensions, and other local services. The R516 and R512 and its secondary routes currently offer safe and accessible travel for this demographic.

The significant increase in HGV traffic proposed during the construction phase will adversely affect these individuals and, in some cases, may undermine their independence due to fear of heavy traffic volumes. With construction planned to operate from 7 a.m. to 7 p.m., Monday to Saturday, there is a real risk that elderly and vulnerable residents will feel confined to their homes during these hours. The negative effects of the Covid-19 lockdown on this demographic are well documented; granting this planning application may unintentionally recreate similar restrictions by making them afraid to travel.

- R516 / R512

According to the planning application, traffic volumes on the R516 will increase, which will inevitably drive additional traffic onto secondary routes as drivers attempt to avoid the construction zone. These secondary routes are not designed to accommodate increased traffic and lack the necessary infrastructure. No assessments have been provided regarding potential accidents or risks associated with redirecting traffic onto these roads.

Furthermore, the R516 and R512 as well as its secondary routes are widely used by locals for walking and cycling, and both are primary routes for many cyclists. Despite this, the planning application makes no reference to the increased risks that higher HGV volumes will pose to cyclists and pedestrians.

The below photograph is on R516 between Croom and Camoge Bridge



Existing Traffic Volumes:

Existing traffic volumes were recorded on Wednesday, 15 January 2025. It should be noted that the planning application does not provide specific times or defined locations for these counts. On that date (15/01/2025), only one of Limerick's third-level colleges had fully returned, another was operating a phased return, and students in the remaining college were not due back until the end of January. A 2023 study by University College Galway found that,

nationally, 40% of students continue to live at home and commute to college due to accommodation shortages, which further affects traffic patterns.

It is also important to recognise that the R516 and R512 serve as key links between local towns, with Mondays typically being a preferred delivery day for many businesses. Although the application describes the area as predominantly agricultural, no adjustment has been made for seasonal agricultural traffic peaks during the summer. In addition, the weekly mart in Kilmallock, held on Mondays, has not been reflected in the recorded traffic volumes. Baseline traffic forecasts should account for the cumulative impact of other wind farm planning applications and their associated construction supply routes. The developer would have been aware of these concurrent projects when submitting the application, as several were already progressing through the planning system. The traffic forecasts do not include any other type developments that are within the planning process. Furthermore, Lough Gur—a popular tourist destination during the summer months, accessed via both the R516 and R512—has also been excluded from the traffic volume assessment.

This existing traffic flow volume is not accurate for the above reasons and therefore any predicted traffic volumes on the planning application must be seen as inaccurate.

*The Tionscadal Eireann Project Ireland 2040 states from figures released by the N/M20 Project office show that the proportion of fatal collisions to all personal injury collisions on the N20 are four times higher than the national average. In addition, the rate of personal injury collisions on the N20 is substantially higher than average, meaning drivers are more likely to be involved in a personal injury collision on the N20 than on other national roads in the country.*

The statistic above directly affects the R516 and R512. In particular, the R516 includes many L routes that link directly to the N/M20. When a road traffic accident occurs, this creates an automatic detour for all vehicles, often causing severe congestion in Croom. Despite this, the traffic management plan does not address the implications of the statistic or provide an emergency procedure for managing traffic diversions arising from closures of sections of the N/M20. Diverting this volume of traffic onto the R516 and R512 significantly increases safety risks, and these risks are further heightened by the proposed addition of construction traffic.

The planning application displays the Turbine Delivery Route with an access track being provided at Tullovin. However there is no defined construction traffic route at Tullovin. Indeed there are no structural reports for either Camoge or Tullovin bridge, along with the raised crossing at Camass. The planning application advises of diversions, without any specific information, therefore it is impossible to comment on the actual and possible effects additional traffic would have on any proposed diversion routes.

Photographs R516 Turbine Delivery Route Access Track Entrance on Bruff Side Tullovin Bridge



Photographs R516 Turbine Delivery Route Access Track Entrance on Croom Side Tullovin Bridge

R516 Proposed Turbine Delivery Route & Construction Traffic Route

The Camoge bridge is a single lane traffic access, with the increase in HGVs on this route and no details provided in reference to the impact additional traffic volumes will have from both

structural and traffic flow perspectives. The following photographs show the current water levels at the bridge.

The below photographs were taken at Camoge Bridge 15/11/2025









The below photographs were taken at Camoge Bridge on 06/11/2025



The planning application advises the main construction traffic entrance will be from R516, however it also outlines other entrances that will facilitate construction traffic. Both of the above are conflicting statements without no defined construction routes being identified.

The planning application 16.2.1 Legislation, Policy and Guidance References includes The UK Traffic Capacity of Urban Roads TA79/99. This reference must be considered irrelevant to this planning application as it is not directly applicable to Ireland.

- HGV Emissions :

The planning application does not address the effects of emissions from the volume of HGVs on human life, wildlife, rivers and fisheries or general air pollution.

It is confirmed that diesel trucks are bad for health because their exhaust contains harmful pollutants like fine particulate matter and nitrogen oxides, which can cause respiratory and cardiovascular problems, and is a probable human carcinogen. Exposure can lead to immediate issues like eye and breathing irritation, and long-term exposure can increase the risk of developing chronic conditions and certain cancers.

- Wind Turbine Health Implications:

The World Health Organization has provided clear evidence regarding the noise impacts of wind turbines. Numerous other experts have also presented updated, evidence-based findings on infrasound propagation, diffraction, and detection methods. It is well established that infrasound travels greater distances than audible sound. The characteristics and scale of the proposed turbines will further contribute to the detectability and travel distance of infrasound.

To accurately assess these impacts, several requirements are essential: the use of up-to-date technology, testing conducted at various times of day and night, measurements taken under differing weather conditions, and assessments performed on the turbine array as a whole rather than on individual units in isolation. It is crucial that all relevant testing methods and the most current scientific evidence are applied to safeguard the health and wellbeing of both humans and wildlife. (Prof. Ken Mattsson, Copenhagen - Separating Myth from Fact on Wind Turbine Noise).

It is ironic that Greensource website advises of the following:

<https://greensource.ie/wind-energy/>

## ONSHORE

Onshore wind energy is the power that's generated by wind turbines located on land driven by the natural movement of the air.

Wind farms are usually constructed in areas with low population density and where air flow is not interrupted by buildings or other obstacles.

- Landowner Letters of Consent:

In reference to land folios 51699F and 1539F the consent letter is signed per procurationem (PP) however there is no legal documentation provided within the application to confirm the legal standing of the per procurationem.

In reference to land folio LK6260 landowner consent letter and the sightlines agreement letter, there is a discrepancy on signatures between both letters.

- Conclusion

This proposed industrial-scale development will have significant impacts on our daily lives both during construction and post construction. All of my family's work and social commuting depends on the R516, and my elderly parents live on the opposite side of this road. I require reliable daily access to their home, especially in emergencies or during severe weather events like those experienced in January 2025.

We are also concerned about declining property values. Recent reports indicate that even developers are objecting to planning applications located near proposed turbine sites. At the same time, the government is urging young people—like my son, who is currently in an apprenticeship—to stay in Ireland once they qualify. How can this be realistic when their ability to choose a rural lifestyle is being taken away?

These are serious concerns for the future of our local communities. Developments of this scale risk harming our schools, towns, businesses, sports clubs, and other essential social amenities. If projects like this continue to encroach on rural areas, the very concept of countryside living will be lost.

This is our countryside—our chosen place to live in peace and tranquility, surrounded by nature and the beautiful landscape we proudly call the Golden Vale. We cherish its unspoiled views, admired from locations such as Lough Gur, the Ballyhouras, Knockfierna, and along the river Maigue with its many tributaries, including the Morning Star and the Camoge, each renowned for fishing. Are we now to be pushed out of our chosen way of life, with no regard for the profound and potentially devastating impact this development may impose on us?

Case Reference PAX91.323780

Kind Regards,  
Linda McCarthy