

Joint Submission by Three Affected Households (Clogher East, Kilmallock, Co. Limerick), Located Approximately 3 km from the Proposed Turbines

To:
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

From:
Clogher East,
Kilmallock,
Co. Limerick, V35 W278.

15th November 2025

Re: Ballinlee Wind Farm – Strategic Infrastructure Development Application Case reference: PAX91.323780

Dear Sir / Madam,

Please find enclosed our **formal objection** to the proposed Ballinlee Wind Farm Strategic Infrastructure Development (SID). This submission is made jointly by the following three affected households living within approximately 3 km of the nearest proposed turbine:

Household 1: Lisa and Robert Eustace, Clogher East, Kilmallock, Co. Limerick, V35 W278

Household 2: Helen and John Enright, Clogher East, Kilmallock, Co. Limerick, V35 D274

Household 3: Valerie O'Donnell, Clogher East, Kilmallock, Co. Limerick, V35 YF84

We submit this objection because the proposed development poses significant risks to our residential amenity, wellbeing, the local environment, biodiversity, hydrology, landscape character, and road safety. Our full objection sets out detailed grounds for refusal, including deficiencies in the EIAR, the NIS, and the overall planning justification provided by the developer.

Lack of Community Consultation – Aarhus Convention

We wish to highlight that none of our households were contacted or consulted at any stage during the preparation of this application, despite being among the closest residents to the proposed turbines. This lack of meaningful engagement is inconsistent with the **Aarhus Convention**, which guarantees the public the right to early access to environmental information and genuine participation in decisions affecting their environment. The failure to engage directly with households within 3 km of 160 m turbines represents a fundamental shortcoming in the applicant's approach to public participation.

For all of these reasons, and those detailed in our attached submission, we respectfully request that An Coimisiún Pleanála **refuse permission** for the proposed development.

Yours sincerely,

Lisa and Robert Eustace

L. Eustace Robert Eustace

Helen and John Enright

Helen Enright John Enright

Valerie O'Donnell

Valerie O'Donnell

Joint Submission by Three Affected Households Located Approximately 3 km from the Proposed Turbines (Case Reference: PA X 91. 323780)

1. Residential Amenity Impacts

1.1 Visual Dominance and Overbearing Scale

The proposal includes **17 turbines up to 160 m in height**, creating a significant industrial intrusion within a rural agricultural landscape. The Environmental Impact Assessment Report (EIAR)'s own visual modelling confirms visibility across a wide area, including multiple turbines visible from within approximately 3 km of our homes. This constitutes an unacceptable level of visual impact and fundamentally alters the rural character of the area.

1.2 Noise Impacts

EIAR Chapter 13 relies on optimistic modelling assumptions and does not fully consider worst-case conditions, amplitude modulation or low-frequency noise. Residents within 3 km are at realistic risk of sleep disturbance, reduced amenity, and cumulative noise impacts arising from both turbines and associated substation infrastructure.

1.3 Shadow Flicker

Shadow flicker predictions underestimate exposure for residents within several kilometres. Combined with visual dominance and noise, this represents a cumulative amenity impact that has not been properly assessed.

2. Landscape and Visual Effects

The turbines would significantly alter the rural landscape between Athlacca and Bruff. This area contains dispersed housing, agricultural activity, and landscape assets that contribute to the character and identity of the locality. The Limerick County Development Plan contains policies to protect rural amenity and landscape character; the proposed turbine heights and proximity to homes conflict with these objectives. EIAR Chapter 12 acknowledges long-range visibility but fails to properly assess impacts on community receptors within 3 km.

3. Population and Human Health – Vulnerable Groups & Psychosocial Impacts

There are vulnerable individuals living within our households and the surrounding area, including children with additional needs and sensory processing sensitivities. These groups are especially affected by noise, low-frequency sound, visual movement, and shadow flicker.

In addition, the uncertainty and scale of the proposed development have already caused stress and anxiety among local families, particularly those managing additional pressures at home. Psychosocial stress arising from major infrastructure projects is recognised as a legitimate human-health concern.

Despite this, the EIAR's Population and Human Health chapter does **not** assess:

- vulnerable groups,
- sensory-sensitive individuals,
- potential stress, anxiety or wellbeing impacts.

This represents a serious omission and does not satisfy the requirements of the EIA Directive to assess effects on **sensitive receptors**, including vulnerable groups and families already facing increased pressures.

4. Biodiversity, Wildlife & Habitat Impacts

Our households chose to live in this rural area because of its rich biodiversity, natural habitats, and abundance of native wildlife. The proposed development threatens these qualities through construction of turbine bases, access roads, hardstands, borrow pits and the 27.6 km grid connection route. These works will result in habitat loss, fragmentation and long-term disturbance.

EIAR Chapters 6 and 7 fail to adequately assess:

- risks to protected species, including Whooper Swan,
- displacement and collision risks,
- cumulative effects from other regional wind farms,
- sensitivity of wetland and farmland habitats used by native species.

The Natura Impact Statement (NIS) relies heavily on mitigation to exclude adverse effects on the Lower River Shannon SAC, despite clear hydrological pathways and insufficient ecological survey depth. Reasonable scientific doubt remains.

5. Water, Hydrology and Hydrogeology

The site contains sensitive hydrological features with downstream connections to designated ecological sites. The EIAR underestimates risks of:

- sediment-laden runoff,
- contamination from borrow pits and construction areas,
- alteration of natural drainage pathways,
- adverse impacts along the grid connection route.

Given the scale of earthworks, excavation and track construction, the precautionary principle must apply.

6. Land, Soils and Stability

EIAR Chapter 8 acknowledges peat and soft soils in parts of the site. Turbine bases, access tracks and borrow pits increase the risk of:

- peat instability,
- slope failure,
- drainage alteration.

The EIAR fails to provide robust worst-case scenario modelling or sufficient justification that these risks can be managed safely.

7. Traffic and Construction Impacts

Local rural roads around Athlacca and Bruff are not suited to the delivery of turbine components, heavy machinery or sustained construction traffic. The EIAR underestimates:

- road safety risks to residents,
- construction-related disruption,
- wear and damage to local road infrastructure,
- cumulative impacts from turbine and grid-route construction activities.

These impacts would be substantial for the households closest to the affected roads.

8. Planning Policy Non-Compliance

The development conflicts with key objectives of the Limerick County Development Plan relating to:

- protection of rural residential amenity,
- safeguarding of landscape character,
- appropriate siting and scale of wind energy development.

Turbines of 160 m height near dispersed rural homes do not align with the intent of these policies.

9. Lack of Meaningful Community Consultation

Despite references to “community engagement,” none of our households — located just 3 km from the nearest turbine — were contacted or meaningfully consulted. No public meeting, direct outreach or information session was provided.

This contradicts best practice in public participation and undermines the EIAR’s claims of adequate community engagement. It also falls short of expectations under the Aarhus Convention and the EIA Directive.

10. EIAR and NIS Deficiencies

Across multiple chapters, the EIAR relies on incomplete survey data, optimistic assumptions and mitigation-dependent conclusions. The NIS does not remove reasonable scientific doubt about impacts on relevant sites. These deficiencies reduce confidence in the application’s predictions.

11. Conclusion and Request for Refusal

For the reasons outlined above, the proposed development would cause:

- significant residential amenity impacts,

- unacceptable effects on vulnerable groups and human wellbeing,
- degradation of rural landscape character,
- serious risks to biodiversity and wildlife,
- hydrological and ecological threats,
- major construction and traffic disruption,
- conflict with planning policy,
- and is based on an EIAR and NIS that are materially deficient.

We therefore respectfully request that An Coimisiún Pleanála **refuse permission** for the Ballinlee Wind Farm.

Yours sincerely,

Lisa and Robert Eustace

L Eustace Robert Eustace

Helen and John Enright

Helen Enright John Enright

Valerie O'Donnell

Valerie O'Donnell

15.11.2025