



An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

16/11/2025

Case reference: PAX91.323780 10 year planning permission for Ballinlee Wind Farm consisting of 17 no. wind turbines, a permanent 110kV substation and ancillary development

Dear Sir/Madam,

Lough Gur Development Co-Operative Society wishes to lodge a formal objection to the above planning application for the reasons outlined below.

1. Visual Impact on Lough Gur Protected View

The proposed turbines will introduce a significant visual intrusion into the scenic and heritage-rich landscape surrounding Lough Gur. The panoramic views from multiple vantage points, which currently offer an uninterrupted natural setting, will be disrupted by the presence of large-scale turbines proposed in this application. This alteration undermines the visual integrity of one of Ireland's most iconic archaeological and cultural landscapes.

The area surrounding Lough Gur has been designated as a Protected View in the *Limerick Development Plan 2022-2028* as shown in *Figure 1* below. The applicant has demonstrated disregard of the impacts of the proposed development on Lough Gur and its environs throughout the application and this is particularly evident by the photomontage *VP19* provided. The photograph has been taken from a secluded location within Lakeshore Park where the local topography and vegetation has blocked most of the impact on the view. This is extremely disingenuous and insulting. The applicant has failed to provide information to facilitate a legitimate assessment of the visual impact from the Protected View.

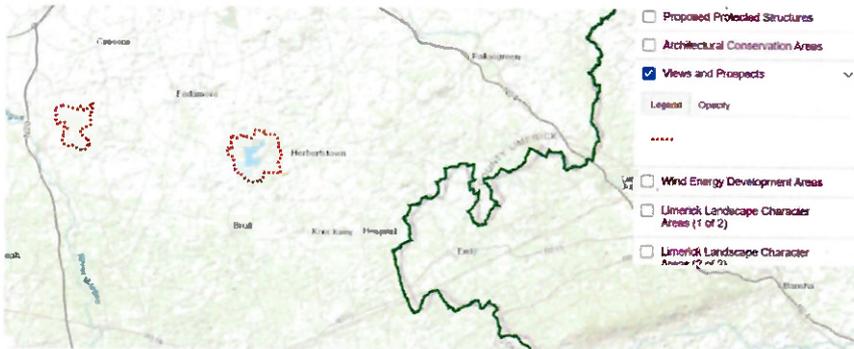


Figure 1 - Limerick Development Plan 2022-2028 Lough Gur and Tory Hill Protected Views

The same applicant has provided a more honest photomontage within their separate application for the Garrane Wind Farm within *the Landscape and Visual Impact Assessment* with VP21 so are clearly more familiar with Lough Gur and the available vantage points than the information presented in this application. It is noteworthy that the proposed Ballinlee Wind farm is c. 5.5km from the shores of Lough Gur and the Garrane Wind Farm is c.16km from the shores of Lough Gur. The proposed Ballinlee Wind farm would be clearly visible and far more obtrusive from the location of VP21 of the Garrane Wind Farm application, yet this vantage point was not included in this application. This point is further demonstrated in Figure 2 below.

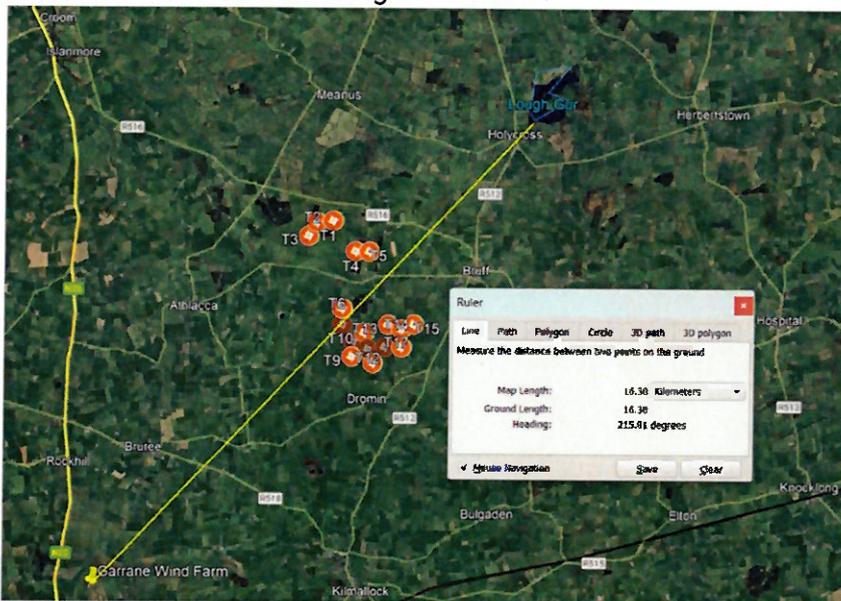


Figure 2 - Proximity of Lough Gur to Ballinlee Wind Farm (orange denote turbines) and Garrane Wind Farm

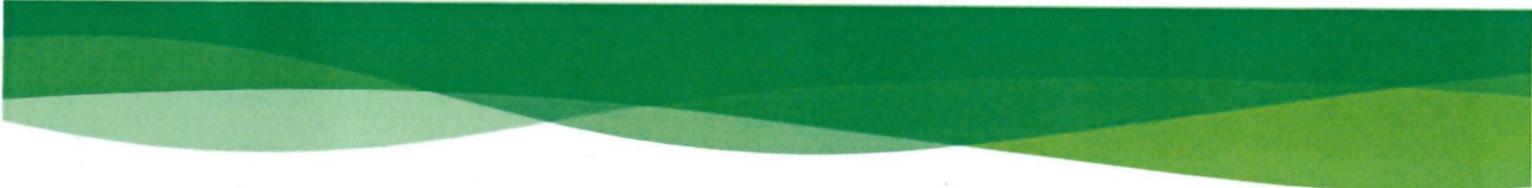


Figure 3 and Figure 4 below are just two locations within the Protected Views area where the proposed wind farm will have a significant visual impact and would have provided a more meaningful visual impact assessment, but the applicant has been obviously selective in the photomontages it has submitted throughout the application.

To provide further evidence of the visual impact of the proposed development on the Protected Views around Lough Gur Figures 5, 6, 7 & 8 demonstrate that the proposed Ballinlee Wind Farm will be clearly visible from the various vantage points identified. **The applicant has neglected to provide photomontages from representative locations within the Protected View for the public and planning authority to be afforded the opportunity to understand the implications. It could be inferred that the EIA has not correctly considered the visual impact of the proposal in its assessment if it is based on the photomontages submitted with this application.**

It is undeniable that the proposed application has a detrimental impact on the views available from Lough Gur and surrounding environs including several national monuments. **The proposed development is therefore in direct conflict with *Limerick Development Plan 2022-2028 Policy EH P8 Landscape Character Areas LCA 05 Lough Gur Specific Objective a) Safeguard the visual amenity of the area and to have regard to the views and prospects in and out of Lough Gur.***



Figure 3 Existing view from public viewing point overlooking Lough Gur looking towards proposed development

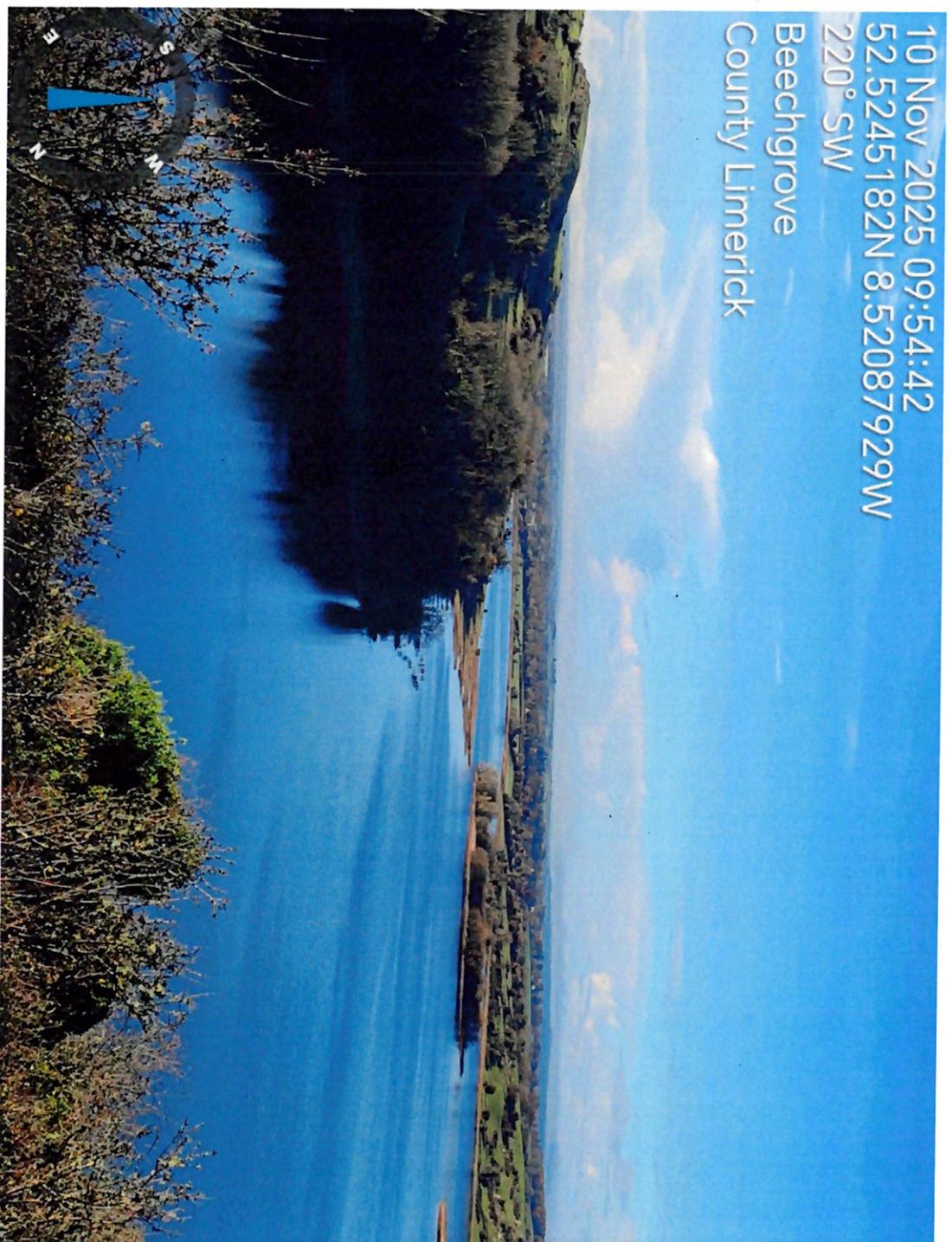
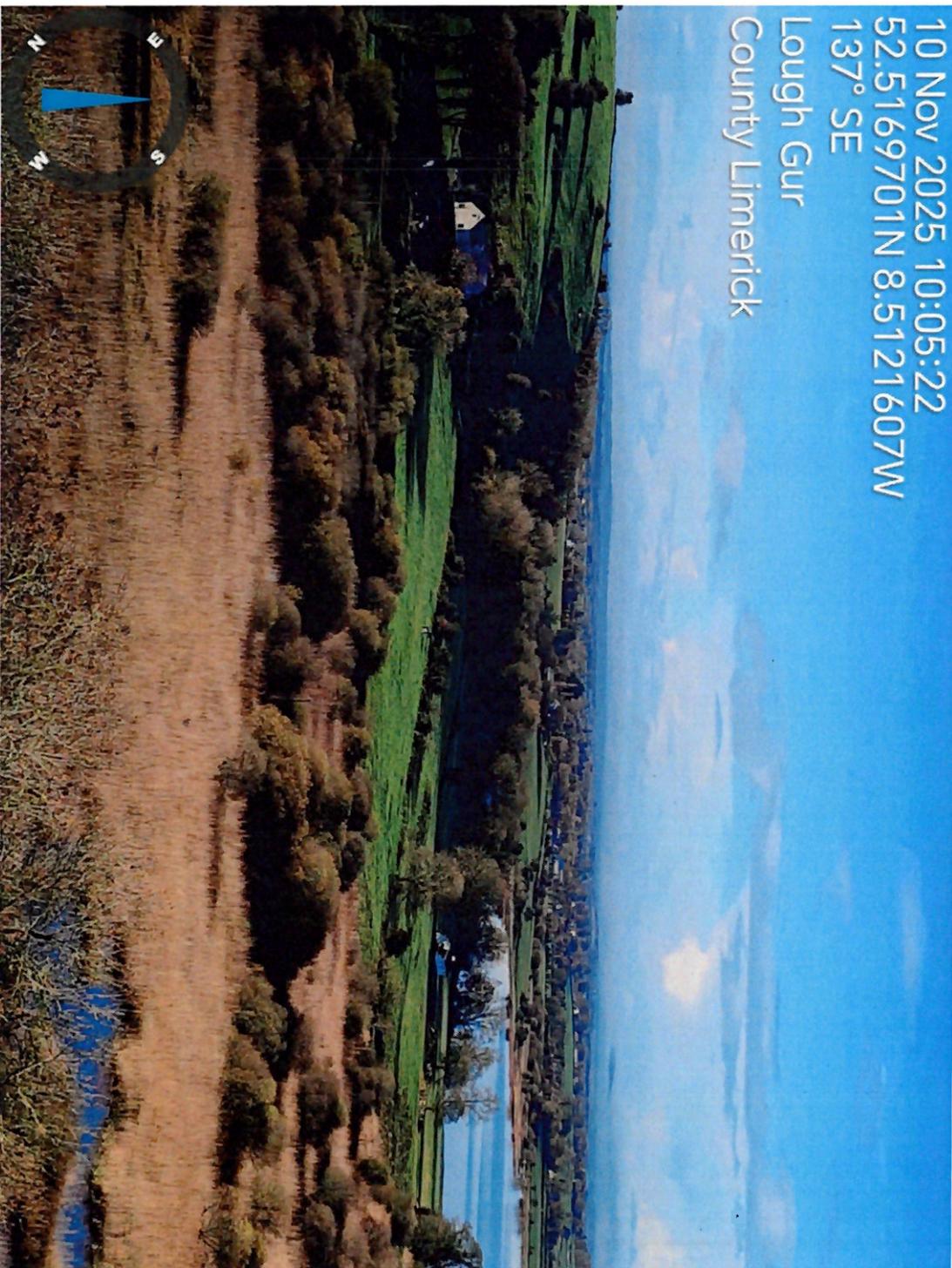


Figure 4 Existing view from Carraig Aille 1 (7th Century) Ringfort looking towards proposed development

10 Nov 2025 10:05:22
52.5169701N 8.5121607W
137° SE
Lough Gur
County Limerick



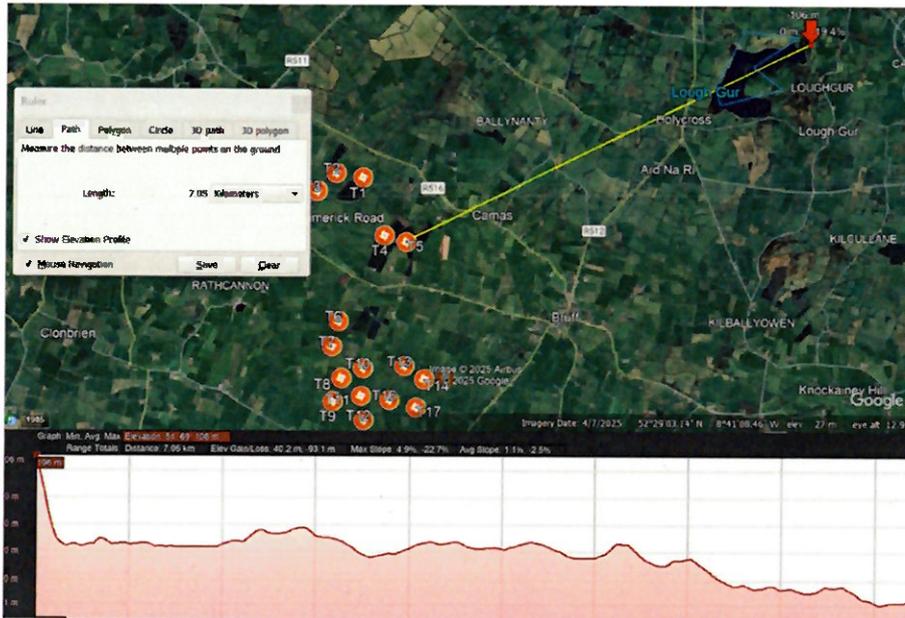
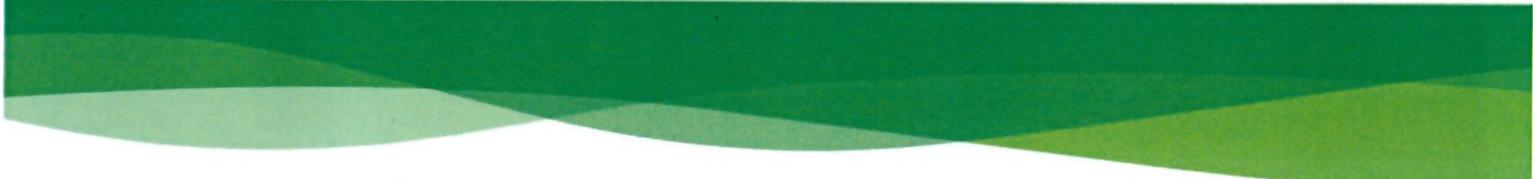


Figure 5 – Lough Gur Public Viewing Point (all turbines at ~160m high will be visible)



Figure 6 – Knockfennel and Knockadoon (all turbines at ~160m high will be visible)





Figure 7 – Carraig Aille I (7th Century Ringfort all turbines at ~160m high will be visible)

2. Tourism & Cultural Heritage Impact

The scale and nature of the proposed development presents a significant impact to the overall attractiveness of Lough Gur and environs as a visitor destination. Lough Gur attracts people from near and far to its shores and Lakefront Park. The area has been inhabited for over 5000 years and contains over 130 listed sites (28 of which are national monuments in State care) ranging in date from late Neolithic / early Bronze Age through to post Medieval times. In the 2009 *Lough Gur Environmental Management Study* it was suggested that *“In recognition of these unique characteristics, it is proposed that Lough Gur could be nominated for inclusion on the World Heritage List.”*

I see no reason why we still should not have this ambition for Lough Gur. To be considered for such an accolade, the following criteria apply:

To be deemed of outstanding universal value a property must meet the conditions on integrity and/or authenticity as per the Nara Document on Authenticity. The Inspectorate is very demanding in this



respect. For cultural sites this would involve a clear and independently substantiated justification of any 'intervention' by way of, for example, conservation/restoration or adaptation.

It is hard to imagine these criteria being met if the proposed development proceeds. It is ironic that one of the stated benefits of the proposal is as a means of safeguarding for the future, yet we are clearly limiting many potential future opportunities for the development, growth and protection of our local heritage.

3. Grange Stone Circle

The application acknowledges the significance of Grange Stone circle and the proximity of the proposed trenching and duct installation to the site. It is the largest stone circle in Ireland and has been dated to 2850-2950BC. Numerous sub surface features have been found in this area on either side of the R512.

However, proper mitigation measures are not proposed as part of the proposed development to excavate a trench on the R512. Grange stone circle is not mentioned in Chapter 19 Schedule of Mitigations nor specifically in the mitigation measures of Chapter 14.

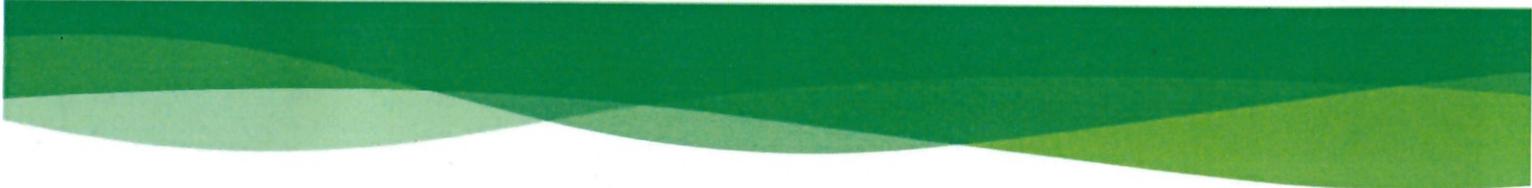
It is important that the mitigation measures including geophysical survey, test excavation, monitoring, recording and preservation be applied to the entire development including the cable route that passes Grange Stone circle.

4. Impact on the Whooper Swan Population

Lough Gur is internationally and nationally important for migrant wildfowl species and is designated as a Natural Heritage Area and a Wildfowl Sanctuary. Appendix 7D Whooper Swan Management Plan submitted by the applicant details the flight path of Whooper Swans between Lough Gur and areas to the southwest of the proposed site boundary. Appendix A of this report catalogues the locations where Whooper swans have been recorded foraging from 2020-2025. The majority of the locations detailed require Whooper Swans to cross the proposed development to travel between Lough Gur and the foraging areas.

The report details disruption to the foraging lands due to the proposed development and plans to mitigate that by land enhancement in any area in Figure 1 of the Whooper Swan Management Plan. The report does not detail what will happen if the management plan is not proven to be effective. Will the turbines obstructing the flight paths and foraging areas of the Whooper swans be removed? The application does not detail how the applicant will guarantee the implementation of the grassland management measures in perpetuity within the project boundary.





The applicants NIS states that whilst the areas designated for Habitat and Species Management Plan are not *“not considered Key Components of the Proposed Development, they are integral associated project elements aimed at supporting the management and enhancement of biodiversity on site”*. I contest that the Whooper Swan Management plan does not enhance biodiversity on site, it acknowledges that it will have a severe negative impact on the Whooper Swan population and suggests a mitigation plan that may or may not work and requires long term monitoring and potential adjustments in lands that are both inside and outside of the project boundary on which the applicant has no control or authority.

The proposed development does not comply with the Limerick Development Plan 2022-2028 Policy EH P8 Landscape Character Areas LCA O5 Lough Gur Specific Objective d) to safeguard the existence of Natural Heritage Areas and the Wildfowl sanctuary when assessing applications for development in the area.

Conclusion:

For the reasons outlined above we strongly advocate the refusal of permission for this development.

Thank you for considering this submission.

Yours Sincerely,



Donal Murnane.
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