

Kyle,
Bruff,
Co. Limerick.
V35 PY27

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

Case reference: PAX91.323780

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

To Whom it May Concern,

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

I am writing to formally object to the proposed Ballinlee Wind Farm development. While I fully support renewable energy and the importance of sustainable planning, this project is wholly unsuitable for the Bruff area and will have deeply damaging consequences for our community, our environment, and my own family. The scale of the development, its proximity to homes, and the lack of adequate assessment make it impossible to support.

1. Proximity to Homes, Health, and Residential Amenities

My father, who is in his eighties, lives approximately 1km from the proposed development site. He underwent a hip replacement during the summer and already experiences serious sleep difficulties and mobility issues. As he can no longer walk to Bruff, he is entirely dependent on driving to access essential services, including the town's only local shop. The level of construction traffic, noise, road disruption and grid-route excavations proposed will severely limit his ability to safely access the town. This poses a significant risk to his independence, wellbeing, and day-to-day functioning.

Noise from turbines of 160m high, including low-frequency noise for which no proper mitigation has been provided, will only worsen his existing sleep problems. The EIAR relies on 2006 Wind Energy Guidelines that are no longer appropriate for modern turbine sizes. No adequate assessment has been carried out regarding sleep disturbance, low-frequency noise or the specific vulnerabilities of elderly residents living in such close-proximity. This is a clear failure to comply with Article 3 of the EIA Directive (2014/52/EU), which requires that effects on population and human health be fully assessed.

Our own home is approximately 2km from the centre of Bruff and within close reach of the proposed turbines. We too will experience significant noise, visual intrusion, shadow flicker, and loss of residential amenity. The cumulative impacts on our family and on the wider community have not been sufficiently acknowledged or assessed.

2. Traffic, Access and Safety Concerns

Bruff's road network is small, rural, and already under pressure. The proposed grid cable route, which stretches almost 28 kilometres, will run across multiple regional and local roads including the R512 and R516, as well as numerous minor rural roads. These are used daily by local residents, including elderly people, schoolchildren, and those commuting to work.

The construction phase, projected to last at least two years, will result in hundreds of heavy vehicles travelling through the area every day. This will bring disruption, safety risks, and road damage. For vulnerable individuals like my father, who depends entirely on car access to reach his essential services, the impact will be severe. The town's only shop and key services will become more difficult and, at times, dangerous to access. The EIAR provides only outline traffic management measures, and it fails to address the full extent of the disruption to everyday life in Bruff.

3. Landscape, Heritage, and Visual Impact

The proposed turbines, at heights of up to 160 metres, would be the tallest in County Limerick. Their presence would dominate the rural landscape, permanently altering the

character of the Golden Vale and the Bruff–Dromin–Camas ridgelines. The visual assessment carried out by the developer does not fully acknowledge the scale of this intrusion or the level of visual dominance these turbines will have on surrounding homes and heritage areas.

Lough Gur, a site of exceptional archaeological and cultural significance, is protected under Objective EH031 of the Limerick Development Plan. The proposed development threatens protected views and landscapes, going against the Council's policy to preserve and protect this culturally important area. The turbines would create an industrial backdrop to an area of profound historical value, which is unacceptable.

4. Environmental and Wildlife Impacts

The environmental impacts of the development have not been properly assessed. The EIAR provides insufficient field data regarding Whooper Swans, an Annex I protected species under the EU Birds Directive, despite their known presence in nearby flooded fields and feeding habitats. The removal of nearly two kilometres of native hedgerow will have a permanent and irreversible impact on biodiversity. These hedgerows cannot simply be replaced through replanting.

There are also significant concerns regarding bat populations, drainage patterns in flood-prone lands, and the lack of detailed hydrological assessments. The project poses substantial risks to local wildlife and habitats that have not been adequately addressed.

5. Legally Flawed EIAR and Project Splitting

A major concern is the unlawful splitting of the project. The grid connection, stretching 27.6 kilometres to Killonan, has been separated from the main wind farm application. This contravenes the High Court judgment in *O'Grianna v. An Bord Pleanála* (2014), which ruled that a grid connection is an integral part of a wind farm and must be assessed as a single project. By failing to do so, the EIAR is legally deficient, and the environmental assessment cannot be considered complete or compliant.

6. Property Value, Community Impact, and Loss of Choice

There is strong evidence that large wind farms can reduce the value of nearby properties, particularly those located within one to two kilometres. With multiple turbines located close to our home and to my father's home, this development would significantly restrict our ability to sell or relocate in the future. Families like ours would

effectively be trapped, unable to make choices about their own futures due to the industrialisation of our local landscape.

The project has already caused division within the community. A Just Transition should not result in families suffering financial losses, health risks, and reduced enjoyment of their homes and land. Renewable energy must be pursued in a fair and balanced way, and this proposal does not achieve that.

7. Lack of Meaningful Community Engagement

The developer's engagement with the community has been wholly inadequate. No public meeting was held, and many residents, including myself, did not receive notification or invitation to any form of consultation. The reasons provided by the developer for avoiding public engagement are unconvincing and have caused further mistrust. This process fails to meet the requirements of the Aarhus Convention and the EIA Directive, both of which demand early, open, and meaningful public participation.

Bruff is not an isolated rural area but a growing, thriving community. The scale and location of this wind farm would fundamentally alter the character of the area, compromise the health and wellbeing of residents, and negatively impact protected landscapes and wildlife. The reliance on outdated guidelines, the legal flaws in the EIAR, the serious traffic and safety implications, and the failure to properly assess health impacts make this development wholly unsuitable.

For all of these reasons, I respectfully request that this application be refused in full.

Thank you for taking the time to consider my submission.

Kind Regards,

Majella Daly,

Bruff,

Co. Limerick