

Uregare,
Kilmallock
Co. Limerick
Ireland
V35 WN50

The Secretary,
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902
Date: 18/ 11 / 2025

RE Planning Reference PC91.323780 - 10-year planning permission for Ballinlee Wind Farm consisting of 17 no. wind turbines, a permanent 110kV substation, underground electric cabling systems & ancillary development. Located in Knockuregare & other townlands in County Limerick.

To: An Coimisiún Pleanála

Applicant: Ballinlee Green Energy (Parent Company Greensource)

Dear Secretary,

We are writing to formally object to the proposed construction of a wind farm consisting of 17 large turbines across Bruff, Dromin and the surrounding townlands in Co. Limerick. This objection is based on several significant errors and omissions by the applicant which will lead to the erosion of our well-being which contravenes European and international human-rights law.

Our home will be one of the most severely impacted homes out of 500+ in the community, in terms of proximity, Noise, Shadow flicker. There is no justification for inflicting such immeasurable impact on a family in the name of Climate Action

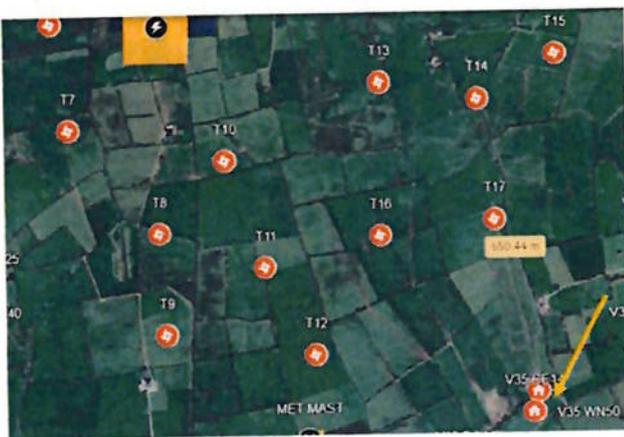


Figure 1 'My Map' Turbine Coordinates Mapped and NSLs



Figure 2 - Our Home

Location

V35 WN50 Townland Knockuregare

Nearest Turbine: T17 – 652m

EIAR Reference: NSL165 - H182:

Grounds For Refusal –

1. Our property will experience a noise increase of 15 dB = “Very Significant; “Profound” as per IEMA Guidelines and EPA 2022. The development application presents an unacceptable impact and should be refused, failure to demonstrate that significant adverse effects can be avoided, prevented, or reduced (Article 8a(1)) / EIA Directive 2011/92/EU as amended by 2014/52/EU)
2. Breach of WHO 2018 Noise Guidelines: Noise exceeds allowable noise limit
3. Breaches 2006 WEDG: (i) Predicted Shadow Flicker 55 Hours per Year and (ii) separation distances between turbines
4. Failure to use the best available scientific evidence and tests: Noise assessment based on outdated, unfit-for-purpose assessment techniques’ such as ETSU-R-97 & WEDG 2006 (Recital (32) of Directive 2014/52/EU)
5. Failure to assess EIAR correctly / not properly assessed under **Article 5(1)** and **Article 5(3)** - errors made during Noise Assessment in placement of NMLs
6. Failure to assess the impacts of noise on vulnerable groups: **i.e. impact in Child With Autism**. Developer lists population trends, reports total population change but fails to identify vulnerable population, and therefore has not assessed of impacts has been established, therefore in Breach of EPA 2022 EIAR Guidelines and EU EIA Directive 2014/52/EU: Article 3(1)

Please Supporting Documentation: Consultant Clinical Psychologist letter – [Appendix 1](#)

7. Breach of Article 8 of the European Convention on Human Rights (ECHR)
8. Breach Planning and Development Regulations 2001 (S.I. No. 600 of 2001), Article 22(2)(g), material error in Planning Documents, Grounds for Invalidation of Application

Supporting Documentation: McMahon O’Brien Tynan Solicitors Letter – [Appendix 2](#)

9. Breach to Article 8 of the European Convention on Human Rights (ECHR)
10. Contravention to the Limerick Development Plan:
 - Objective EH 031 Views and Prospects - Views and Prospects surrounding Lough Gur
 - The Limerick Biodiversity Action Plan (2025–2030)
 - Facilitate a good standard of quality of life for the population of Limerick through ensuring high quality residential, recreational, educational and working environments.

Family Personal Statement

On behalf of John Richmond and Marie Clare Power.

I, Marie Clare grew up in this house and have cherished memories of it throughout my life. The quietness of the area, the surrounding nature, dogs and cats and riding ponies. It was an idyllic childhood and today, our daughter enjoys the same simple joys, caring for her pony and pets in the same manner. This home and its environment are deeply woven into our family's history and wellbeing. The rural landscape and all that it entails was a determining factor in returning to live in my childhood home with my husband and children. My children are the next generation to live in this area.

I moved back here after the passing of my mother and father, a time that coincided with our daughter Vivienne's diagnosis of autism in 2021. At a time of grief it brought comfort knowing that my parents' wishes for me to take on the family home were carried through, and it was the perfect environment for my young children, Vivienne and Robert who were just aged 3 and 2 at the time. We chose to move here to provide a way of life that supported our children's needs. We are happy here, settled and have a good life.

Vivienne is sensitive to loud noises and has significant sensory needs. She requires regular outdoor activity for regulation, her trampoline in the garden, the swings, and her beloved pony Trigger are essential to her daily life. She loves her home, so much so that when we go away for any length of time, she is anxious to return to her beloved pets. A home bird true and true. Home is more than rooms and a building, it is the place where we see Vivienne at her best, where her true potential emerges and where she does not have to navigate the often painful, environmental stressors of uncontrolled noise or visual stimuli.

This company propose to erect a turbine a mere **652 metres from our home (T17)**, standing **160 metres** high with a rotor span of **135 metres**. But that's not all, there are 2 more turbines spaced **810m & 820m (T12, T16)** within 1 km of our home, another **8 within 1.1km – 2km (T8, T9, T10, T11, T13, T14, T15)** and **1** more that is **2.2km (T6)** of our home. This project poses an intolerable threat to Vivienne's wellbeing and our family. The noise, shadow flicker, and constant presence of such behemoth structures will force her indoors, depriving her of the physical release and sensory regulation she desperately needs. Vivienne has been demonstrating very encouraging progress in all developmental domains, we have no doubt that unlimited access to her therapeutic pony and safe outdoor space is a considerably contributory factor to these developmental gains. We have been, and hope to, remain hopeful for her future, where she will reach her fullest potential.

However, this project proposal has brought upset, stress and immense worry, and these emotions have in turn upset the family balance and in turn Vivienne's regulation. I am mother, protecting my children and I make no secret that I am fighting tirelessly to protect our home and our children, and our rural community. Turning our community into a Wind Factory is so wrong on so many levels, which we will expand on. But fundamentally this is a serious human rights issue. Article 8 of the European Convention on Human Rights (ECHR) protects the right to respect for private and family life and the home. Our children deserve the chance to grow up in a safe, quiet environment.

We have some land that we hoped would one day allow our children to build their own family homes, continuing the legacy of this place. That future is now under threat given the recent case where **Orsted Onshore** have objected to a poor lady trying to build a house when she is well within her democratic right to do. A link to this article can be located in **Land Sterilisation** section.

The project fails to respect the rights of children, families and the preservation of a safe environment for those most vulnerable. For Vivienne, whose needs are unique and profound, the impacts of this development would be devastating. For us as her parents, and for her brother, it would mean the loss of peace, safety, and the future we have worked to build here.

To add to this, the most significant issue we wish to draw to the Board's immediate attention is the gross material error whereby we, as a non-participating landowner, observe that our property has been included within the Landholding Boundary and Study Areas. We consider this to be a serious and fundamental error that should retrospectively invalidate the application.

There are other findings and breaches to EU Directives, National and Spatial Policies, national Guidelines as we will detail below.

We support Ireland's transition to renewable energy and recognise the urgent need to meet our national climate action goals. However, such projects must be in the right places and supported by well-considered planning. To industrialise this area is wholly inappropriate.

This developer has somehow been given a green light to advance an application for 17 turbines, each vast moving structures of steel, in a densely-populated area that is steeped in archaeology, rich in wildlife, and home to a growing community at a time when housing needs are already acute. The ever-prevalent housing crisis nationwide is such, that availability of houses to either purchase or rent is restricted. Were the development to proceed, **we would inevitably have to leave our home during the construction phase**. We anticipate that the inevitable environmental stressors that come with such a development, would be particularly difficult for Vivienne to process.

This is in essence a live experiment on how children with sensory sensitivity respond to the considerable extraneous stimuli, should we see a regression in her development; the onus is on us as parents to remove her to a place of calm and safety. How does a parent do this, when the home has become the place of upset and discomfort?

Change is especially difficult for Vivienne, change in both her routine and her surrounding environment. Should the development go ahead, it will warrant significant preparation on our part and the part of her educators and therapists to facilitate as much as is feasibly possible preparing her for such changes surrounding her home and garden.

We respectfully request that An Coimisiún Pleanála refuse permission for this development. Thank you for taking the time to review my submission.

Contents

Material Error - Incorrect Mapping Site Boundary, Study Area, Landholding Boundary Maps.....	6
Inadequate and Misleading Noise Study	14
Community Engagement.....	15
Intrusive & Disrespectful Door-To-Door Engagement.....	18
Environmental, Wildlife & Health Impacts.....	18
Biodiversity Loss	18
Heritage & Cultural Landscape.....	19
Archaeological and Historical Context of Dwelling and Area	20
Cumulative Impact with Garrane Wind Farm (Case Ref 323635)	22
Further Errors	23
Land Sterilisation	24
Overall Conclusion	24
Final Statement	25
References:	26
Appendix 1: Letter from Marianne Nagle, Consultant Clinical Psychologist	27
Appendix 2: McMahon O'Brien Tynan Solicitors.....	29
Appendix 3: Excerpt from drawing reference 22635 MWP 01 00DRC5005.....	31
Appendix 4: Figure 6-1 Planning Application Boundary and Study Area selected for habitat and mammal surveys	32
Appendix 5: Map Turbine Locations for Our Home NSL165 H182	32
Appendix 6: Email conversations with the Ballinlee Green energy team.....	33
Appendix 7: NSL 4 beside the address of V35 WN50.....	36
Appendix 8: Vivienne and Trigger.....	37
Appendix 9: Greensource state Wind Farms Are Usually Placed in Low Population Areas	37

Material Error - Incorrect Mapping Site Boundary, Study Area, Landholding Boundary Maps

The application should have been invalidated when this error was communicated to the Board by my solicitor on 17th October 2025.

This application must be invalidated retroactively as the application 323780 has not met all statutory requirements (ownership / consent declarations). Under Article 22(2)(g) of the Planning and Development Regulations 2001 (as amended), an applicant who is not the owner of the land must include the written consent of the owner. The Developer or title holder most certainly does not have my consent to include lands at V35 WN50 & front paddocks which are being captured within the "Landholding Boundary" without my permission.

Appendix 2 contains a copy of McMahon O'Brien Tynan Solicitors LLP letter outlining the error. The letter was sent to both An Coimisun Pleanala and Limerick City and County Council where it is clearly outlined with evidence that I, Marie Clare, are the owner of the Property at V35 WN50 and the owner of the front paddocks, which have been incorrectly included in error within the Landholding Boundary and Study Area for Ballinlee Wind Farm.

The Board as of submission date 18th November have not responded to outline that they have advised the applicant and requested new maps / drawings/ figures to correct this wrongful error.

The various Figures and Drawings we have outlined below are just a sample of some of the errors. The current planning application, EIAR, AA and EIS all show an untrue Landholding Boundary, which incorrectly captures my property in a "study area" which is extensively referenced throughout.

We would prefer not to append the additional documents referenced in this letter, as doing so would place personal information in the public domain. Accordingly, I request that the Board contact me at the email address provided, and I will provide the additional information directly.

Alternatively, please feel free to liaise with Barry O'Connor at McMahon Tynan. Landholding boundary is defined as (pg 8 of Chapter 6)

"Landholding boundary defined as includes all the folios that the developer has landowner consent".

Table 6-2: Summary of Study Area for Ecological Receptors

Receptor	Study Area Definition	Rationale	Guidance
Habitats & Flora	Lands within the landholding boundary ⁷ and works areas along the TDR and GCR which extend beyond the Development site.	Habitats potentially affected by the Development, all lands surveyed so habitat constraints could be identified and avoided during the design stage of the Development.	Fossitt 2000
Badger	Lands within the landholding boundary and 150 m (minimum) from works area.	150 m is the zone of disturbance for setts arising from construction activities.	Smal, 1995; NRA 2006; NRA 2009b
Pine marten	Lands within the landholding boundary and suitable habitat within 250 m of from works area.	Precautionary buffer as pine marten are a wide-ranging species and detection can be challenging due to their nocturnal nature.	NPWS, 2019; NatureScot, 2024c
Otter	Lands within the landholding boundary and 150 m (minimum) upstream and downstream of watercourse crossing points.	150 m is the zone of disturbance for holts arising from construction activities.	NRA 2008; NRA 2009b
Other mammals (Irish hare, Irish stoat,	Lands within the landholding boundary	All available and suitable lands surveyed for these wide-ranging and common species.	Irish Hare: Reid <i>et al.</i> , 2007; Reid <i>et al.</i> , 2009

Landholding boundary defined as includes all the folios that the developer has landowner consent

Figure 3 : EIA Chapter 6 Bio-Diversity pg 8 Table 6.2

Here is a list of just some of the maps and Figures That are Incorrect (this is not an exhaustive list):

- **Site Layout – Master Sheet Wind Farm Site**
22635 MWP 01 00DRC5005 - landholding boundary edged in blue (full image of drawing with incorrect boundary highlighted Appendix 3 to this document)
- Figure 6-5: Transect survey routes of the southern section of the Study Area
- Figure 6-7: Static detector deployment locations at the southern section of the Study Area in 2023
- Figure 6-8: Watercourses within the Study Area surveyed for otter
- Figure 6-14: Habitats recorded within southern section of Development
- Figure 6-16: Hedgerow Appraisal System (HAS) results within southern section of Development
- Figure 6-17: FW2 Depositing/lowland rivers within the Study Area (as mapped by the EPA)
- Figure 6-18: Invasive plant species recorded within the Study Area
- Figure 6-21: Confirmed bat roosts within the Study Area
- Figure 6-24: Badger setts recorded in the Development

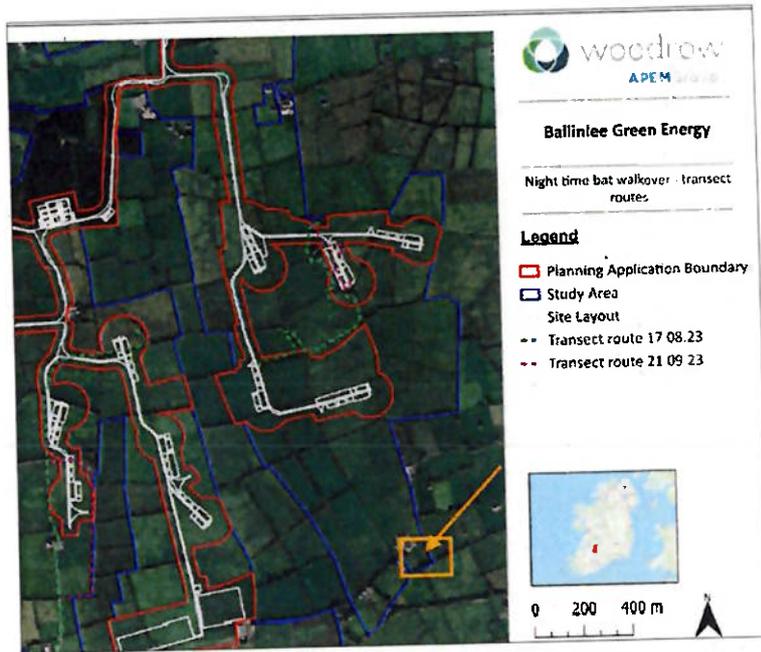


Figure 4: Chapter 06 Biodiversity pg 38 Highlighted Area shows my property incorrectly captured in Study Area

Health Impacts – Noise – Set-back - Shadow Flicker

This development presents unacceptable risks to our family, in particular our daughter Vivienne. These impacts are particularly acute our daughter's sensory sensitivities. We are one of the closest homes located to a turbine.

Breach of 2006 Separation Distance

We will have 12 Giant Wind Turbines behind our home, all breaching 2006 guideline separation distances as per 2006 WEDG.

2006 Guidelines state: *"to ensure optimal performance and to account for turbulence and wake effects, the minimum distances between wind turbines will generally be three times the rotor diameter (=3d) in the crosswind direction and seven times the rotor diameter (=7d) in the prevailing downwind direction."*

In the case of Ballinlee Wind Farm, the applicant has designed all 12 in the southern cluster in breach of separation distances. This will create wake effects, turbulence and amplitude modulation which is an established cause of nuisance (Webster (2024 IEHC 136)

Marianne Nagle, Vivienne's clinical psychologist, outlines very clearly for the Board the concerns and impacts this project poses to Vivienne. Marianne warns that exposure to these new sensory demands will cause distress, withdrawal, and potential regression in Vivienne's coping skills, undoing considerable therapeutic progress she has made. A copy of this letter is located in **Appendix 1**. We ask the Board to read and consult with qualified professionals' experts. Under Article 5(3)(b) of Directive 2014/52/EU, the Board must ensure it has, or has access to, sufficient expertise to examine the EIAR which includes relevant environmental points raised in third-party submissions.

Industrial wind turbines, through low-frequency noise, vibration, and shadow flicker are known to cause stress and behavioural disturbance in horses. Any such disruption would directly affect Vivienne, whose ability to self-soothe through interactions with 'Trigger' and engage meaningfully with the world depends on a calm, predictable sensory environment

Noise Impacts

Our home is located only **652 metres** from the nearest turbine, far below the recommended minimum separation distance of **2 km**, which is best practice according to industry experts . At this distance, noise emissions will be constant and intrusive, disrupting sleep and daily life. For our daughter, who already wakes very early in the morning, who is highly sensitive to visual stimuli, the impact will be **severe**. For the remainder of the household the impact will also be severe but extent of which is unknown and therefore precautionary principle applies (ref). As per the case in Wexford, Gibbet Hill the only way to stop the nuisance was the permanent shut down of 3 turbines

The applicant has failed to provide adequate assessment of noise impacts on vulnerable groups, despite repeated questions during community engagement. They have remained silent on the impact of children with autism. Their tokenistic FAQ in their Community Report is an insult to parents who manage difficult situations at home. (please note that the full transcript of these exchanges is included in the Appendix) but below I draw your attention to copy of correspondence exchanged between Ballinlee Green Energy and Marie-Clare, where significant concerns are raised on the impact to health:

Dear Marie-Claire & John,

In relation to community consultation, we reiterate that we are fully satisfied with our offering. Significant opportunities were offered to members of the community to engage, ask questions about the project and seek clarification. We do not agree that the Zoom meeting arranged with you was tokenistic. This meeting was arranged to provide you with an opportunity to receive information regarding the project as submitted for planning permission.

Appendix 1C of the planning application outlines the comprehensive engagement activities which have been undertaken. I personally was at your home with my colleague Patrick during our door-to-door consultations and discussed the project with you in person.

On your query concerning baseline assessments, the Environmental Impact Assessment Report (EIAR) was prepared in accordance with the relevant legislation and guidance, including assessments of population and human health at an appropriate level of detail for this stage of the planning process. The assessment on population and human health has been carried out with reference to the EPA Guidelines on the information to be contained in Environmental Impact Assessment Reports, as is best practice.

We also note your specific concern about the proximity of turbines and the potential for noise or visual impacts, particularly with regard to your daughter's sensory sensitivities. The project's noise, shadow flicker, and health assessments have been prepared by qualified independent specialists and are publicly available within the EIAR documentation. These studies have been designed to ensure compliance with all relevant national standards and guidelines. Should the project receive planning consent, and once operational, any specific concerns raised by residents particularly in relation to sensitive locations or individuals will be reviewed on a case-by-case basis. This will allow the project team to assess any verified issues under real operating conditions and take appropriate action in accordance with relevant regulations and commitments.

Kind Regards,

Nadine

The Community Team at Ballinlee Green Energy
T: +353 (0)61 975 200
A: Station Road, Adare, Co. Limerick
E: info@ballinleegreenenergy.ie | W: www.ballinleegreenenergy.ie



Please note: Our Community Team is happy to assist with any project-related queries and is committed to providing helpful, respectful, and timely support. We kindly ask that all communications remain courteous and respectful. The Ballinlee Green Energy community team reserve the right to refrain from further correspondence in cases that violates our code of respectful engagement.

Figure 5: reply to our email sent 27th Oct

The applicant refers to EPA Guidelines as above. EPA Guidelines explicitly require that assessments identify **vulnerable groups** (sensitivity of receptors) and consider their specific exposure and sensitivities. This has not been done. At no stage in this exchange are health concerns are considered. The focus is purely on compliance. Who are these “qualified independent specialists”? Are they psychologists, clinicians, or have they any medical background or qualifications?

The Community Team state in their documentation that Autism is addressed on a “case-by-case” basis. However, the email exchanges clearly show that they do not treat Autism any differently from any other household or community member. Should an issue arise during the operational phase, the burden is placed entirely on the household to prove that a problem exists. The language used, specifically the reference to “verified issues highlights this.

Overall, there is a clear lack of commitment to genuinely treating sensitive individuals on a case-by-case basis.

In the following email exchange, we have had to outline a series of false statements the team made also in respect to interactions we had with them over the course of the community engagement:

marieclare.power@gmail.com

From: marieclare.power@gmail.com
Sent: Monday 27 October 2025 22:45
To: Info Ballinacreegreenenergy'
Cc: Niall Collins; richard.odonoghue@eirreachtas.ie; 'IR ShotMeFirst'; Conway, Gregory
Subject: RE: Feedback as requested - T1

Dear Nadine,

Let's first address the three opportunities to attend your community clinics.

We will reiterate. The first set of community clinics were scheduled on 26th & 27th August. Your company scheduled these at a highly inconvenient time, coinciding with the return of our local school. This is an obviously difficult week for parents. We clearly communicated this to you at the time. A second date, 18th September, was only announced on 11th September, giving just four working days' notice.

You state, you offered to arrange video calls at a time of our choosing. This is correct however, let me reiterate, the zoom meeting which we were to attend on the 14th of October was tokenistic as the application had been lodged since the end of September.

You state, we received a home consultation, which was provided at our request. No such consultation took place. For the record, this statement is incorrect.

You state, the community team has been available since March. Again, this is inaccurate and conflicts with the EIAR. Perhaps you may need to reference the relevant chapter in the EIAR?

You state, you have consulted with residents and have conducted more than a hundred door-to-door consultations. Again, this is inaccurate and conflicts with the EIAR.

You state, that you are fully satisfied with the range of opportunities provided to the community to engage and discuss the project. We, as members of the community are not satisfied.

You state that the project design has been developed following extensive technical, environmental, and regulatory assessments. By your omission, we conclude your design has not included baseline health and population impact assessments for vulnerable residents and conflicts with the below statement from the FAQ in the EIAR:

My children have special needs - how will this affect them?

Ballinlee Green Energy commit to taking a case-by-case approach with families living locally to ensure the continued enjoyment of their home and do all we can to support individual circumstances as much as possible.

Figure 6: Email exchange 27th October 2025

Set-Back Distance -Best Practice

International best practice recommends a minimum set-back of 10 times the rotor between turbines and dwellings to protect against noise and shadow flicker.

By proposing turbines at a third of this distance, the applicant places our home and family at direct risk of adverse health effects.

World Health Organization (WHO 2018 – Environmental Noise Guidelines) recommends wind farm noise should be below **45 dB Lden**, which corresponds to approx. **35–37 dB(A) LAeq/L90**, in quiet rural areas. This project is setting a limit of 45 dB(A) LAeq which is far in exceedance of acceptable limits and will cause significant increase in background noise for our home and neighbours.

This developer does not comment on WHO 2018, health is not discussed, rather compliance is the language spoken, but compliance is measured against 2006 Guidelines (WEDG) and ETSU-R-97 which are into their **30th Year!!**

How on earth in 2025 is this permitted? Is the Board aware that people, including us, will be forced out of their home elsewhere, or worse, forced to stay in a Wind Prison!

International Best Practice (Tasmania, Australia & Germany) all require a much lower noise level at 35 dB than what our government have set at 45 db. Tasmania are the most conservative with **35 dB(A) Leq night limit**, which requires a minimum 1.5 km setbacks. Irish & Australian court rulings show nuisance and sleep disruption at distances of 500–700 m.

Infrasound and Low Frequency Noise, travels much further than previously assumed. Professor Alun Evans's shows how peer-reviewed scientific evidence, WHO guidance, HSE policy, and international standards that the scientifically supported best-practice setback for modern 4.5 MW turbines is at least 1.36 km, with many jurisdictions requiring 1.5–2 km to protect human health, sleep, and the natural environment.

The developer is not only ignoring scientific evidence, the HSE, and the WHO by relying on outdated 2006 guidance, but is also breaching these very same 2006 Obsolete guidelines. This approach is displaying a total disregard for human health.

Shadow Flicker Risks

- Shadow flicker occurs when rotating blades cast moving shadows across dwellings. This effect is visually disorientating and can cause headaches, nausea, and sensory distress.
- For our daughter, who has autism and significant sensory sensitivities, shadow flicker presents a serious health risk. It will force her indoors, depriving her of outdoor activity essential to her wellbeing.
- The applicant has failed to adequately assess or mitigate shadow flicker impacts, despite their known risks.

Precautionary Principle and Autism-Related Sensory Impacts

Planning authorities are required to apply the **precautionary principle** where evidence is uncertain but potential harm is serious. In this case, the risks of noise and shadow flicker resulting in sensory overload and dysregulation will cause harm to vulnerable individuals like Vivienne. The precautionary principle demands refusal of this application.

The precautionary principle, enshrined in Article 191 of the Treaty on the Functioning of the European Union (TFEU), requires that where scientific evidence is uncertain but potential harm is serious, protective measures must be taken.

Conclusion

The combination of excessive noise, inadequate set-back distances, and shadow flicker risks makes this development incompatible with residential amenity and public health. These impacts are unacceptable, particularly for vulnerable groups, and provide strong grounds for refusal.

Inadequate and Misleading Noise Study

The applicant's noise assessment is wholly inadequate and borders on fraudulence in its methodology. As shown in the attached image ([Appendix 7](#)), the microphone used to record sound levels was placed behind dense foliage rather than in an open, representative location. This positioning artificially dampens recorded noise levels, producing results that do not reflect the true impact of turbine operation on nearby dwellings.

Such a practice is contrary to the principles of transparent environmental assessment. Noise monitoring must be conducted in conditions that accurately represent residential exposure. By concealing the microphone behind vegetation, the applicant has deliberately obscured the reality of turbine noise, thereby misleading both the public and the planning authority.

This methodological flaw invalidates the reliability of the noise study and undermines the credibility of the Environmental Impact Assessment. It further demonstrates the applicant's disregard for proper scientific standards and strengthens the case for refusal of the application. **Recital (32) of Directive 2014/52/EU** states 'Data and information included by the developer in the environmental impact assessment report should be complete and of sufficiently high quality'. This is a breach and the Board should refuse the application.

The proposed development poses a direct and disproportionate risk to our daughter, Vivienne, who has autism and significant sensory sensitivities. She is highly vulnerable to environmental disturbances such as noise, vibration, and shadow flicker. These impacts are not abstract concerns but lived realities that would profoundly affect her health, wellbeing, and daily functioning.

Specific Sensory Impacts

Vivienne depends on outdoor activities, in particular her pony to regulate her sensory needs. The constant noise and shadow flicker from turbines located only **652** metres from our home and the other 11 all within 2 km, will force her indoors, depriving her of these essential supports.

Shadow flicker is visually disorientating and can trigger distress, headaches, and behavioural crises in individuals with sensory sensitivities.

European Convention on Human Rights (ECHR)

Article 8 of the European Convention on Human Rights (ECHR) guarantees the right to respect for private and family life and the home. This right extends not only to physical habitation but also to the ability to enjoy one's home environment without disproportionate interference (ECHR, 1950; Council of Europe, 2010). This wind farm will significantly impact our family's ability to enjoy our home. Our daughter is autistic and children on the autism spectrum are particularly sensitive to environmental stressors such as noise, flicker, and sudden or persistent low-frequency

disturbances (Kerns et al., 2015; Williams, 2019). The intrusion of turbine noise, shadow flicker, and visual dominance within over shadowing our home will have a disproportionate and harmful impact on her wellbeing, daily functioning, and sense of safety. Allowing this development to proceed at this distance from our home would undermine the essence of the protection afforded under Article 8 by preventing us from maintaining a peaceful and health-supporting family life.

Conclusion

The applicant has failed to assess or mitigate the impacts of this development on vulnerable groups, despite repeated questions during community engagement. This omission is unacceptable. The precautionary principle demands refusal of the application, as the risks to health and wellbeing, particularly for children with autism are serious, foreseeable, and disproportionate. The enjoyment of our home will be disproportionately impacted. Our children deserve the opportunity to grow up in a stable, quiet, and predictable environment, free from unnecessary sensory overload.

Community Engagement

Lack of Information, False Statements, Refusal to Hold a Public Meeting

Under the EIA Directive (2011/92/EU as amended by 2014/52/EU), the Irish Planning and Development Regulations (2000–2025), and national guidance including the Wind Energy Guidelines and SEAI Community Engagement guidance, this applicant should have provided clear, accurate, easily accessible information to the public in a meaningful way.

The reality is that really nothing could be further from this requirement. Public participation must occur before decisions are effectively finalised and must be designed to build trust and ensure transparency.

In this case, Ballinlee Green Energy failed to meet these obligations. I trust the Board will give as much consideration as other breaches and shortcomings as community engagement goes well beyond 'ticking the box' exercises.

Failure to Provide Information

The company refused to disclose full details of the project when asked and rather defaulted to vague references to community benefit funds.

Critical information such as turbine height and proximity to dwellings was withheld, despite being determined as early as October 2024 during pre-application meetings.

When we asked for details of proximities of our home, we were only provided to the nearest one, and refused details of any other distance check. We had to wait until the official application was lodged before obtaining this information.

How is this acceptable community engagement, this information is vital for parents of a child with additional needs (note full details of all correspondence, (emails) between this company and our household are included in **Appendix 6**

Refusal to Hold a Public Meeting & Unacceptable Marketing Materials

Despite repeated requests from the community, the developer refused to host a public meeting. Instead, they offered only private "clinics," which are inadequate substitutes for open forums. This refusal constitutes a breach of the Aarhus Convention (1998, ratified by Ireland in

2012), which guarantees access to environmental information and meaningful public participation in environmental decision-making.

A public meeting would have been the only transparent and inclusive form of engagement, allowing all members of the Bruff, Dromin, and Athlacca communities to attend, ask questions, and receive information collectively. Denying this format effectively denied participation and access to information.

The marketing flyer produced by Ballinlee Green Energy is misleading, incomplete, and non-compliant with advertising and planning standards. It fails to provide essential information and deliberately obscures the true nature of the proposed development.

Errors and Omissions in the Flyer

The flyer lists only three townlands, Ballinlee, Ballincurra, and Camas South, omitting Knockuregare where we live. This omission misrepresents the geographical scope of the project. Nowhere in the flyer is the stated height of each turbine disclosed, even though turbine dimensions had already been determined as early as October 2024 during re-application meetings with An Coimisiún Pleanála. Concealing this information denies the public a clear understanding of the scale of the development.

The flyer claims the project will power "42,000 homes," yet provides no evidence or methodology for this calculation. This vague and unsubstantiated figure is designed to exaggerate perceived benefits while ignoring the significant local impacts. It serves as a distraction only from where the real impacts on a community.

Misleading Engagement The back of the flyer refers to "seeking feedback" from the community. However, company representatives confirmed that community feedback would not alter the design or course of the project, this was confirmed to me by the community team at my front door when they visited on 19th June 2025.

This renders the engagement exercise meaningless and undermines the principles of genuine public participation required under the Aarhus Convention and the Access to Environmental Information Directive (2003/4/EC), which ensures that environmental information is made available to the public either actively or upon request.

Failure to Meet Standards By omitting critical information, misrepresenting the scope of the project, and presenting engagement as a token exercise, the flyer breaches both national advertising standards and the Department of Communications' *Code of Practice for Wind Energy Development in Ireland: Guidelines for Community Engagement (2016)*.

Conclusion The marketing tools employed by this company were designed to obscure the true impacts of the development. They failed to meet the standards of transparency, accuracy, and honesty as required. This misleading material further demonstrates the applicant's disregard for proper community engagement and undermines the validity of the application. The applicant's failure to provide accurate information, their omission of households within the consultation zone, and their refusal to hold a public meeting demonstrate a clear breach of both EU and Irish legal obligations. These actions undermine the integrity of the consultation process and further support the case for refusal of this application. As evidenced in the email exchanges this developer has made several false statements with regards out household.

Based on the developer's misleading statements, we have zero confidence in their ability to deliver a responsible and respectful project that is sensitive to the communities living here.

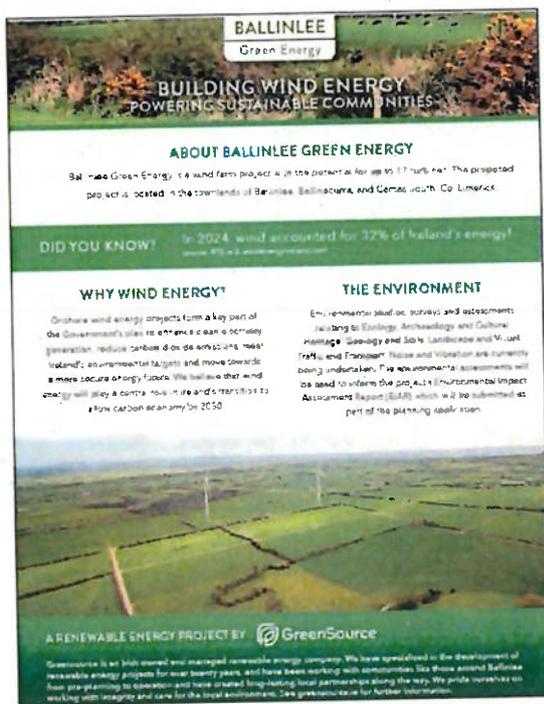


Figure 7: Ballinlee Green Energy Flyer received May 2025. No reference to size of the turbines

Ballinlee Green Energy’s approach to community engagement demonstrates a clear breach of both national guidelines and international obligations under the Aarhus Convention (1998, ratified by Ireland in 2012).

Failure to Comply with National Guidance

The developer adopted a rigid, “one-size-fits-all” model of engagement, offering only private “clinics”. This approach contravenes the *Code of Practice for Wind Energy Development in Ireland: Guidelines for Community Engagement (Department of Communications, Climate Action and Environment, 2016)*, which emphasises the need for flexible, inclusive, and transparent engagement tailored to community needs.

The offer of sterile private format “clinics” was unsatisfactory for individuals who may have lacked the confidence or familiarity with technical planning processes which in turn effectively excluded vulnerable groups from meaningful participation.

Conclusion The applicant’s engagement strategy is not only inadequate but unlawful. It has breached national guidelines on community consultation and violates Ireland’s obligations under the Aarhus Convention. This failure further erodes trust in the planning process and strengthens the case for refusal of the application.

Intrusive & Disrespectful Door-To-Door Engagement

On **19 June 2025**, at approximately 11 a.m., representatives of Ballinlee Green Energy arrived unannounced at our home. One of them, introducing himself as "Patrick," remarked: *"Oh, I've been in this house before, I met your mammy."*

This comment was profoundly distressing. My mother passed away suddenly on **5 November 2020**, and my father died only four months later. These losses remain deeply painful for our family. For a company representative to invoke my late mother in such a casual and inappropriate manner, in the context of promoting a project that will negatively alter our lives, was both intrusive and disrespectful.

Door-to-door engagement is presented by the applicant as a form of consultation. In reality, this encounter demonstrates how such methods can be intimidating, insensitive, and wholly unsuitable for meaningful community engagement. Rather than fostering trust, this approach caused emotional harm and reinforced our sense that the developer is indifferent to the dignity and wellbeing of local residents.

This incident should be formally recorded as evidence of the applicant's failure to conduct engagement in a respectful and appropriate manner. It highlights the inadequacy of their consultation process and further supports the conclusion that the application should be refused.

Environmental, Wildlife & Health Impacts

Biodiversity Loss

It is an objective of the Council to facilitate the development of wind energy in an environmentally sustainable manner. Chapter 9 of our Limerick Development Plan 20220 2028: Climate Action, Flood Risk and Transition to a Low Carbon Economy. **Section 9.4: Renewable Energy** covers related wind/renewable objectives:

"It is an objective of the Council to facilitate the development of wind energy in an environmentally sustainable manner, ensuring proposals are consistent with the landscape character objectives of the Plan, the protection of the natural and built environment and the visual and residential amenities of the area."

This development does nothing to satisfy this objective. There will be significant and permanent biodiversity loss, particularly through the removal of native hedgerows and trees that form critical ecological corridors. The Environmental Impact Assessment Report (EIAR) itself acknowledges that the project will have a permanent, adverse, and locally significant effect on biodiversity.

Hedgerow and Habitat Removal

Approximately 2.8 km of native hedgerows are to be removed, alongside extensive tree felling and clearance of natural habitats.

Hedgerows and treelines are vital components of green infrastructure, providing shelter, feeding grounds, and movement corridors for birds, bats, small mammals, and invertebrates. Their removal will fragment these ecological networks and disrupt species survival.

This directly contradicts the Limerick Biodiversity Action Plan (2025–2030), which explicitly seeks to “prevent the fragmentation of ecological corridors, particularly hedgerows” and to “promote the protection of existing hedgerows and trees that contribute to green infrastructure.”

Species Impact

The EIAR casually refers to the high probability of significant impacts on the badger population at the site yet fails to propose adequate mitigation.

The Whooper Swan, an Annex I species under the EU Birds Directive (Directive 2009/147/EC) and part of the Natura 2000 network, forages in the Corcass area where five turbines are proposed in the northern cluster. This species is of European conservation concern and requires special protection measures.

The removal and fragmentation of habitats will further threaten bird populations, including migratory species, and undermine Ireland’s obligations under EU conservation law.

Conclusion The scale of hedgerow removal and habitat destruction is incompatible with national and EU biodiversity objectives. By fragmenting ecological corridors and threatening protected species, the development represents a clear breach of both the Limerick Biodiversity Action Plan and the EU Birds Directive. These impacts are unacceptable and provide strong grounds for refusal of the application.

The fragmentation of habitats and the threat to protected species reflect the wider disregard for environmental and community wellbeing. Just as biodiversity corridors are disrupted, so too will the daily lives of residents be disrupted by excessive noise, inadequate set-back distances, and the health risks of shadow flicker.

Heritage & Cultural Landscape

Failure to Assess Visual Impact on Lough Gur

The applicant has failed to properly assess the visual and heritage impacts of the proposed wind farm on Lough Gur, one of Ireland’s most significant archaeological and cultural landscapes. The Environmental Impact Assessment (EIA) is incomplete and misleading, as the photomontages provided were taken from inappropriate locations that obscure the true impact of the turbines.

Inappropriate Photomontage Locations

Several photomontages were taken from positions behind dense foliage, which artificially reduces visibility of the turbines and misrepresents their dominance in the landscape.

By selecting vantage points that conceal rather than reveal the turbines, the applicant has produced a distorted visual assessment that fails to reflect the actual experience of residents and visitors.

Omission of Protected Viewpoints

The applicant deliberately avoided preparing photomontages from key elevated vantage points such as Carrig Aille, the Vistor Centre where elevated views are accessible, despite its prominence as one of the most significant archaeological sites overlooking Lough Gur.

The Limerick Development Plan 2022–2028 identifies protected viewpoints and cultural landscapes that must be considered in visual impact assessments. The omission of these viewpoints is a direct breach of planning policy and undermines the credibility of the EIA.

Without assessment from these protected viewpoints, the cumulative impact of the Ballinlee (17 turbines) and Garrane (9 turbines) wind farms on the Golden Vale and Lough Gur heritage complex is concealed.

Impact on Cultural Landscape

Lough Gur and its surrounding farmland retain an ancient settlement pattern and intact field system, in stark contrast to more altered landscapes elsewhere.

The turbines would dominate the skyline, severely compromising the visual character and heritage value of this internationally significant site.

By failing to present honest and representative visual simulations, the applicant has disregarded both best practice in landscape assessment and statutory obligations under the Development Plan.

Conclusion

The applicant's visual assessment is inadequate, misleading, and contrary to planning policy. By using inappropriate photomontage locations and omitting protected viewpoints, the Environmental Impact Assessment fails to capture the true scale of the impact on Lough Gur. This omission constitutes a serious flaw in the application and provides strong grounds for refusal.

Archaeological and Historical Context of Dwelling and Area

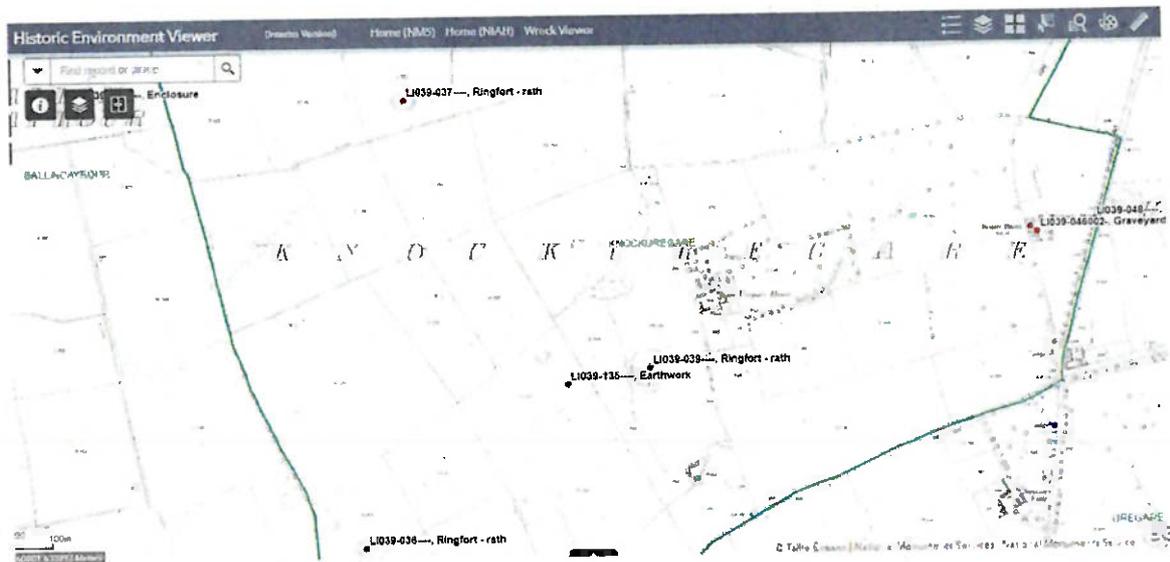
Our home is of historical importance dating back to 1875, constructed of mass stone/ rubble stone walls. It is a fine example of the vernacular, built using the available materials in the locality. We hold in our possession historical documents showing the ownership of the property:

1. an original lease agreement dated 17th January 1898 as registered in the Registry of Deeds which verified the owners were The Provost Fellows and Scholars of Trinity college Dublin who leased the property to Frederick J Hobson. Trinity College Dublin (TCD) held extensive estates across Munster during the 19th century (see appendix for image of same)
2. We also have an original agreement for a subsequent lease between Trinity & William O'Rourke.

My Grandfather Mr. Joseph Power purchased the property in 1929 and it was passed down to my Father where he was born and lived all his life until his sad passing in 2021.

Our home at Knockuregare, built circa 1875, is not simply a dwelling but part of the historical and cultural fabric of County Limerick. This connection places our property within a broader narrative of Ireland's academic and landed heritage.

The Historic Environment Viewer, maintained by the National Monuments Service, records multiple archaeological features in the immediate vicinity of our home, including ringforts (ráth/lis).



These monuments are protected under the National Monuments Acts and are recognised as integral to Ireland's archaeological landscape. The presence of ringforts on or adjacent to the proposed development lands underscores the sensitivity of this area and the need for careful preservation.

The surrounding parish of Uregare is itself steeped in history. As noted in Lewis's Topographical Dictionary of Ireland (1837), Uregare was the site of significant events, including a 1660 skirmish involving Pierce Lacy, and was home to notable residences such as Uregare House, once occupied by the Gubbins family ([GENUKI: Uregare, Limerick](#)). Today, Uregare House lies in ruins, a stark reminder of how once-important heritage sites can be lost when preservation is neglected.

We fear that our own home may face a similar fate if this industrial wind farm development proceeds. The constant noise, shadow flicker, and visual intrusion of turbines will make continued habitation intolerable, forcing us to vacate the property. In such circumstances, our dwelling risks becoming abandoned and derelict, echoing the decline of Uregare House.

This house at Knockuregare represents over a century of lived history, from its construction in the late 19th century to its role in supporting generations of families. Its proximity to recorded archaeological monuments and historic landscapes such as Lough Gur further underscores its significance. To industrialise this area without proper regard for its heritage context is to erase a living link to Ireland's past.

Conclusion

The applicant has failed to assess the archaeological and historical importance of Knockuregare and its surrounding area. By ignoring the heritage value of both our dwelling and nearby monuments, including recorded ringforts, the Environmental Impact Assessment is incomplete and misleading. This omission provides strong grounds for refusal, as the development threatens not only our family home but the preservation of local history itself.

The historical and archaeological importance of Knockuregare and Uregare cannot be considered in isolation. When combined with the impacts of the proposed Garrane Wind Farm, the cumulative effect on the wider Golden Vale and Lough Gur heritage landscape is profound.

As custodians of such an important asset, it is unimaginable to think it could be overshadowed by several giant turbines. We note that no LVIA was completed on our home and request that this is carried out, if this project plan proceeds.

Cumulative Impact with Garrane Wind Farm (Case Ref 323635)

The Ballinlee Wind Farm proposal cannot be assessed in isolation. When combined with the Garrane Wind Farm (9 turbines), the cumulative impact on **the Golden Vale and Lough Gur heritage landscape is profound and unacceptable.**

Visual and Landscape Impact

Together, Ballinlee (17 turbines) and Garrane (9 turbines) would introduce 26 industrial turbines into a historically intact agricultural and archaeological landscape. The cumulative visual intrusion would dominate the skyline, erasing the rural character of Knockuregare, Uregare, and the wider Lough Gur area. Photomontages provided by the applicant fail to capture this cumulative effect, as they deliberately omit protected viewpoints identified in the **Limerick Development Plan 2022–2028.**

Heritage and Archaeology

The combined footprint of both wind farms threatens not only individual monuments such as ringforts recorded in the Historic Environment Viewer, but also the broader cultural setting of Lough Gur, one of Ireland's most significant archaeological complexes. The integrity of Knockuregare House (built c.1875, once part of Trinity College Dublin's Munster estates) and the ruins of Uregare House are further compromised when considered against the industrialisation of the surrounding landscape.

Community and Residential Impact

The overlapping zones of noise, shadow flicker, and construction disturbance from both projects will compound the burden on local residents. Families already struggling with proximity to Ballinlee turbines will face additional impacts from Garrane, creating an intolerable living environment.

Conclusion

The cumulative impact of Ballinlee and Garrane represents a regional transformation of heritage and landscape character, not a localised project. By failing to adequately assess these combined effects, the applicant has presented an incomplete and misleading Environmental Impact Assessment. Permission should be refused on the grounds that the cumulative impact is incompatible with proper planning, sustainable development, and the protection of Ireland's cultural heritage.

Further Errors

In addition to the substantive failures outlined in previous sections, the application is undermined by further procedural and technical errors. These errors demonstrate a lack of transparency and due diligence, and they materially affect the ability of the public to engage with the planning process.

Incorrect Maps – Omission of Dwelling

Figure 10-3 from the Air Quality Chapter is inaccurate.

Our dwelling at Knockuregare has either been omitted from the applicant's mapping or is reflecting an incorrect proximity to the nearest proposed turbines. The nearest turbine is **T17 at 652m, NOT T16 as displayed.**

This omission is a major oversight: it conceals the true impact of the development on our home and family from an Air Quality perspective.

The Environmental Impact Assessment relies on these maps, meaning that the conclusions drawn are fundamentally flawed.

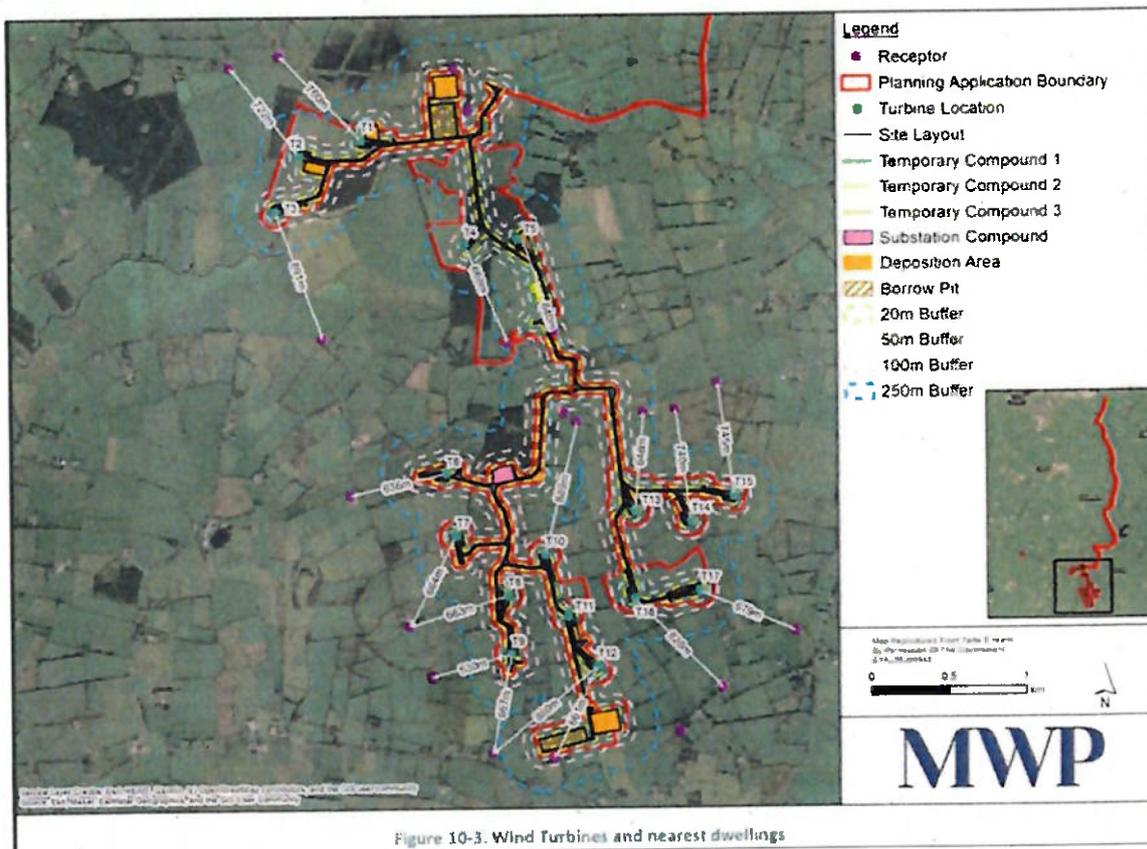


Figure 10-3. Wind Turbines and nearest dwellings

These errors are not technicalities but substantive failures. The omission of our dwelling from maps conceals the true residential impact. It demonstrates that the application is procedurally defective and should be refused.

Land Sterilisation

It has been widely reported that planning permission will be impacted if this windfarm proposal goes ahead. This claim was refuted by the Developer as “false” but the evidence is now there for everyone to see.

In Tipperary earlier this month, we saw that someone’s planning permission is being contested by a Wind Farm Developer (Orsted Onshore). People’s rights, and the power within local planning decisions are being eroded. The article can be located here.

[Wind farm company challenges planning permission for Tipperary woman’s home | Irish Independent](#)

Overall Conclusion

This application is fundamentally flawed and must be refused. Across every dimension, legal compliance, environmental integrity, heritage protection, and community wellbeing and health of our most vulnerable, the proposal fails to meet the standards required under Irish, EU, and international law.

Legal and Procedural Failures

The application is invalid due to misrepresentation of landholding boundaries and absence of landowner consent.

Key information was withheld, including turbine heights and locations relating to nearby homes, consultation letters, and noise studies.

These errors undermine the credibility of the Environmental Impact Assessment and breach the **Planning and Development Regulations (2000–2025)**.

Community and Health Impacts

Noise, inadequate set-back distances, and shadow flicker will cause intolerable disruption to residents, particularly vulnerable groups such as children with autism.

The applicant’s refusal to hold a public meeting, combined with misleading marketing materials, demonstrates a disregard for genuine public participation and breaches obligations under the **Aarhus Convention**.

Heritage and Landscape

Photomontages were manipulated to conceal turbine visibility, omitting protected viewpoints identified in the Limerick Development Plan 2022–2028. The impact on Lough Gur, Knockuregare House (built c.1875), and recorded ringforts documented in the Historic Environment Viewer has been ignored. The risk of abandonment of Knockuregare echoes the fate of Uregare House, now in ruins, and represents a cultural loss that cannot be justified.

Biodiversity and Ecology

The removal of 1.8 km of hedgerows and destruction of habitats will fragment ecological corridors, directly contradicting the Limerick Biodiversity Action Plan (2025–2030).

Protected species, including the **Whooper Swan (Annex I, EU Birds Directive)** and local badger populations, face significant unmitigated risks.

Cumulative Impact - When combined with the **Garrane Wind Farm**, the cumulative effect of 26 turbines will industrialise the Golden Vale and Lough Gur heritage landscape, eroding its cultural, ecological, and residential integrity. The applicant has failed to assess these combined impacts, presenting an incomplete and misleading case.

Final Statement

To grant permission for this development would be contrary to proper planning, sustainable development, and Ireland's obligations under EU and international law. It would set a dangerous precedent that undermines public trust in the planning system, sacrifices heritage, biodiversity, exposes vulnerable families to disproportionate harm and community wellbeing for short-term gain.

We therefore respectfully request that **An Coimisiún Pleanála refuse this application in its entirety** for the protection of our families well-being. The pursuit of achieving net zero is a noble one, however, we should not lose sight of its primary purpose, to protect our environment for future generations. In the UN Convention on the Rights of the Child (2023), it asserts that an application of a child's rights based approach to the environment requires the full consideration of all children's rights. In the spirit of this worthy policy, we respectfully ask that you consider the rights of our children, and the impact it will have on their lives.

Kind Regards,

Marie-Clare Power and John Richmond

18th November 2025

CONTACT DETAILS

Name: Marie-Clare Power and John Richmond

Postal address: Uregare, Kilmallock, Co. Limerick V35 WN50

Email: marieclare.power@gmail.com jnrmond@gmail.com

Phone: 086 8142811 , 085-8122255

References:

- Code of Practice for Wind Energy Development in Ireland Guidelines for Community Engagement issued by the Department of Communications, Climate Action and Environment (December 2016).
- Council of Europe (2010) Guide to Article 8 of the European Convention on Human Rights – Right to respect for private and family life, home and correspondence. Strasbourg: Council of Europe.
- ECHR (1950) European Convention on Human Rights. Rome: Council of Europe.
- Kerns, C., et al. (2015) 'Anxiety in children and adolescents with autism spectrum disorder', *Clinical Psychology Review*, 40, pp. 1–22.
- Williams, D. (2019) *Autism and Sensory Experience: A Guide for Parents and Practitioners*. London: Routledge.
- Environmental Protection Agency (EPA) (2022) *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EIAR)*. Wexford: EPA. Available at: https://www.epa.ie/publications/monitoring--assessment/assessment/EIAR_Guidelines_2022_Web.pdf
- *Webster v MeenacloghSpear Ltd* [2024] IEHC 136.
- Government of Ireland (2001). *Planning and Development Regulations 2001* (S.I. No. 600 of 2001), Article 22(2)(g). Dublin: Stationery Office.

Appendix 1: Letter from Marianne Nagle, Consultant Clinical Psychologist

Marianne Nagle

BA, BSc, MSc, DPP (Clin), M.Ps.S.I

Consultant Clinical Psychologist

✉ mariannenagle@outlook.com

Date: 17/11/2025

To Whom It May Concern,

Re: Impact of Proposed Wind Turbines on Vivienne's Therapeutic Environment and Emotional Wellbeing

I am writing as Vivienne's Consultant Clinical Psychologist to express concern regarding the potential psychological and welfare implications of the proposed wind farm to be located within approximately 640 metres of her home and therapeutic garden. Vivienne, a child with Autism Spectrum Disorder (ASD), engages daily in close interaction with her family's horse. This bond forms a vital part of her emotional and sensory regulation, offering calm, comfort, and connection beyond what traditional therapy alone can provide.

For Vivienne, this relationship is more than companionship. Horses offer a low-pressure, non-verbal means of communication that reduces the need for complex social interpretation. Children with autism, particularly those who are minimally verbal, often experience high levels of stress in social situations requiring speech, eye contact, or reciprocal conversation. When interacting with her horse, Vivienne communicates through presence, touch, and movement—receiving immediate, consistent feedback that fosters trust, safety, and self-esteem. The environment is one of quiet, rural ambience with limited auditory or visual stimulus, this is the only environment the horse is habituated to.

The physical tasks of grooming and leading her horse provide sensory input—tactile from brushing, proprioceptive from lifting or guiding, and vestibular through movement. These sensations help organise the nervous system and regulate arousal levels, allowing her to transition from anxious states to calm focus. In psychological terms, this activity serves as a naturalistic sensory integration therapy, reinforcing her ability to self-soothe and build resilience.

Introducing industrial wind turbines within such close range risks disrupting this therapeutic environment. Research indicates that the low-frequency noise and vibration from turbines can disturb equine behaviour, increasing startle responses and vigilance. Horses, as highly perceptive prey animals, are sensitive to environmental change, and prolonged exposure to unpredictable sound or shadow flicker has been associated with agitation and avoidance. If the horse becomes anxious or unsettled, Vivienne's sense of safety and co-regulation would be immediately affected.

Moreover, children with autism are known to experience sensory overload in response to constant low-frequency or unpredictable stimuli. For Vivienne, whose wellbeing depends on a calm and predictable sensory world, the introduction of turbines nearby could lead to distress, withdrawal, or regression in the coping skills she has developed. Such outcomes would undermine the considerable emotional progress achieved through her daily interaction with the horse.

In my professional opinion, the preservation of Vivienne's therapeutic setting is paramount. The quiet, grounded relationship she shares with her horse is essential to her regulation, communication, and emotional well-being. I therefore fully support the family's objection to the proposed wind farm and strongly recommend that the impact of the close proximity of the proposed turbines be considered in the context of animal-assisted therapies which are a central element of Vivienne's developmental support plan.

Yours sincerely,

Marianne Nagle, BA, BSc, MSc, DPP (Clin), M.Ps.S.I
Consultant Clinical Psychologist

****Summary of Supporting Research:****

Bass, M.M., Duchowny, C.A., & Llabre, M.M. (2009). The effect of therapeutic horseback riding on social functioning in children with autism. **Journal of Autism and Developmental Disorders, 39*(9), 1261–1267.*

Gabriels, R.L. et al. (2015). Randomized controlled trial of therapeutic horseback riding in children and adolescents with autism. **JAACAP, 54*(7), 541–549.*

Ward, S.C. et al. (2013). The effects of therapeutic horseback riding on social and communication skills in children with autism. **Research in Autism Spectrum Disorders, 7*(1), 123–130.*

O'Haire, M.E. (2013). Animal-assisted intervention for autism spectrum disorder: A systematic literature review. **Frontiers in Psychology, 4*, 378.*

Leung, J.Y. et al. (2017). Effects of wind turbine noise on animal welfare. **Animals, 7*(9), 65.*

Appendix 2: McMahon O'Brien Tynan Solicitors

MCMAHON O'BRIEN TYNAN SOLICITORS LLP

MILL HOUSE, HENRY STREET, LIMERICK, IRELAND. V94 K6HH
T +353 (0)61 315100 F +353 (0)61 313547 LDE Box DX3004
E MOD@MODLAW.COM W WWW.MODLAW.COM

Our ref

Your ref

BOC/O2970/1

Limerick City and County Council Via email: planning@limerick.ie

Cc'd: An Bord Pleanála
64 Marlborough Street
Dublin 1

Via email: appeals@pleanala.ie

17 October 2025

**RE: OUR CLIENT: MARIE – CLARE POWER
PROPERTY AT, UREGARE, KILMALLOCK LIMERICK
REF: 323780 | AN COIMISIÚN PLEANÁLA -**

Dear Sirs,

We refer to the above matter. We note a planning application for a Wind farm by Ballinlee Green Energy Wind Farm has been made in relation to the lands at the above address. Our client Maire- Clare Power is the beneficial owner of a house and 2 paddocks which has been included in error. This property is registered in the name of Desmond Power under Folio LK 62016F who is our client's brother. We note in Desmond Powers letter of consent with the planning application that he only mentions Folio LK 10398 of which he is the beneficial owner. However folio LK 62016F was also included in the map submitted of which he is only a part owner with our client.

Our client's property was incorrectly transferred into her brother's name in 2009 as part of folio LK 62016F. The folio needs to be divided to reflect the true ownership of the property. A deed of rectification needs to be completed but probate for our clients' parents has yet to be completed. We have attached the 2009 transfer which incorrectly transferred all the property to Desmond Power. We have also attached a copy of the Will of Michael Power showing our client has inherited her property from her father. Finally please see attached a map of Maire Clares Property marked in red.

We would like to point out that our client's property is part of the study area for the wind farm application. Our client never consented to this and does not consent to having any turbines located near her house. We insist that this error be rectified without delay

If you require any further clarification on this please do not hesitate to contact the undersigned. We look forward to hearing from you as a matter of urgency as our client is concerned by the potential impact on her home.

Yours sincerely,

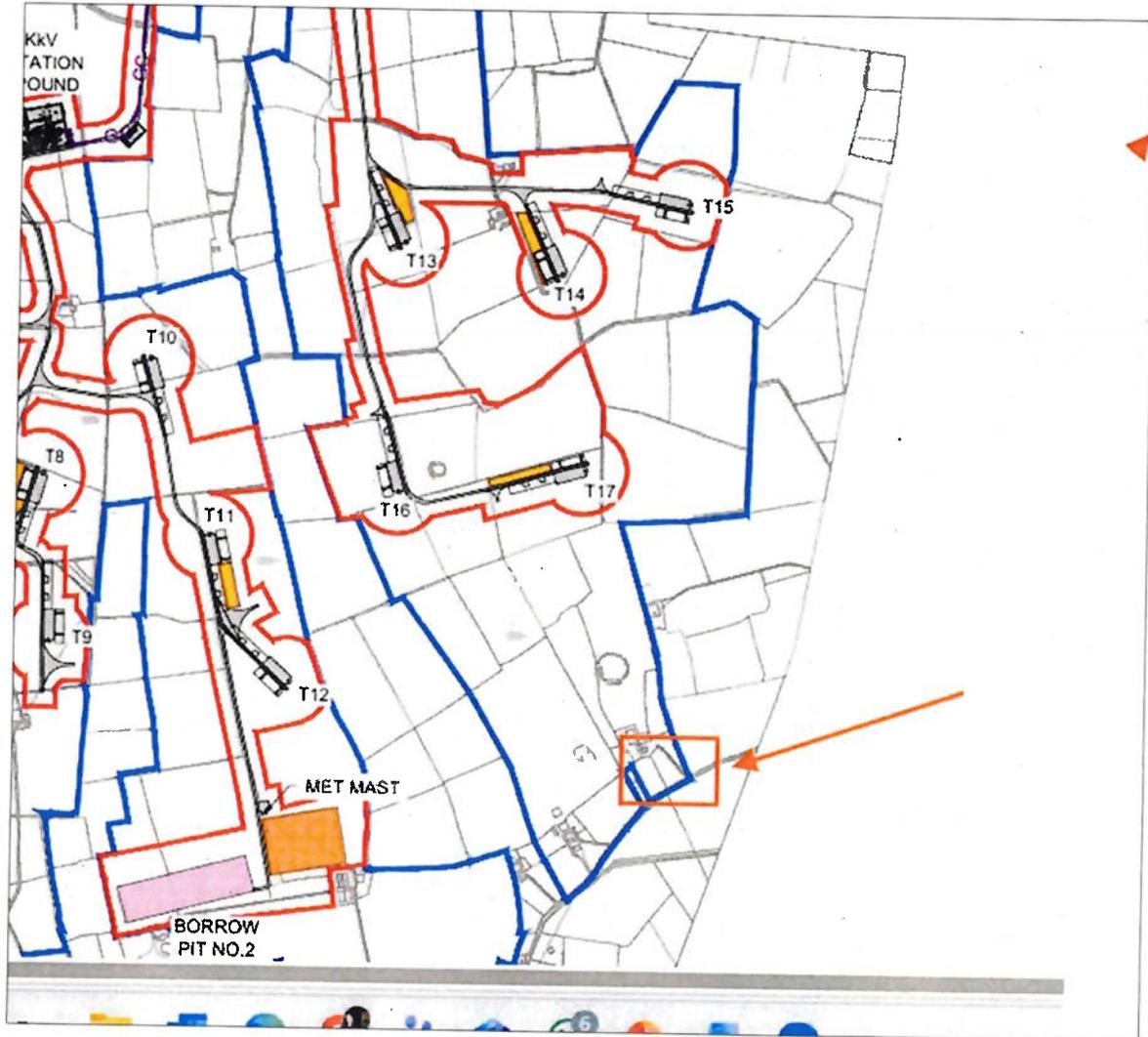
Sent via email and accordingly requires no signature

BARRY O'CONNOR
MCMAHON O'BRIEN TYNAN LLP
E-Mail: boconnor@modlaw.com

PAUL O'BRIEN DAVID O'BRIEN
ADRIAN O'CONNELL MARY GEARY KATE FLY LOUISE RYDAN BARRY O'CONNOR
CONSULTANT ORIA O'BRIEN
FINANCIAL CONTROLLER EGIN MURPHY
INCORPORATING



Appendix 3: Excerpt from drawing reference 22635 MVP 01
00DRC5005



Appendix 6: Email conversations with the Ballinlee Green energy team

Resending Response

 Nadine Walsh <n.walsh@greensource.ie>
To: mariedarepower@gmail.com

 Reply  Reply All  Forward 

 If there are problems with how this message is displayed, click here to view it in a web browser

 Re: Feedback as requested - TT ems
372 KB

Dear Marie Clare,

Please see attached as we received a bounce back email again.

Kind Regards,

Nadine
The Community Team at Ballinlee Green Energy
T +353 (0)61 975 200
A Station Road, Adare, Co. Limerick
E info@ballinleegreenenergy.ie | W www.ballinleegreenenergy.ie



Please note: Our Community Team is happy to assist with any project-related queries and is committed to providing helpful, respectful, and timely support. We kindly ask that all communications remain courteous and respectful. The Ballinlee Green Energy community team reserve the right to refrain from further correspondence in cases that violate our code of respectful engagement.

Dear Marie-Clare & John,

In relation to community consultation, we reiterate that we are fully satisfied with our offering. Significant opportunities were offered to members of the community to engage, ask questions about the project and seek clarification. We do not agree that the Zoom meeting arranged with you was tokenistic. This meeting was arranged to provide you with an opportunity to receive information regarding the project as submitted for planning permission.

Appendix 1C of the planning application outlines the comprehensive engagement activities which have been undertaken. I personally was at your home with my colleague Patrick during our door-to-door consultations and discussed the project with you in person.

On your query concerning baseline assessments, the Environmental Impact Assessment Report (EIAR) was prepared in accordance with the relevant legislation and guidance, including assessments of population and human health at an appropriate level of detail for this stage of the planning process. The assessment on population and human health has been carried out with reference to the EPA Guidelines on the information to be contained in Environmental Impact Assessment Reports, as is best practice.

We also note your specific concern about the proximity of turbines and the potential for noise or visual impacts, particularly with regard to your daughter's sensory sensitivities. The project's noise, shadow flicker, and health assessments have been prepared by qualified independent specialists and are publicly available within the EIAR documentation. These studies have been designed to ensure compliance with all relevant national standards and guidelines. Should the project receive planning consent, and once operational, any specific concerns raised by residents particularly in relation to sensitive locations or individuals will be reviewed on a case-by-case basis. This will allow the project team to assess any verified issues under real operating conditions and take appropriate action in accordance with relevant regulations and commitments.

Kind Regards,

Nadine

The Community Team at Ballinlee Green Energy

T +353 (0)61 975 200

A: Station Road, Adare Co. Limerick

E: info@ballinleegreenenergy.ie | W www.ballinleegreenenergy.ie



Please note: Our Community Team is happy to assist with any project-related queries and is committed to providing helpful, respectful, and timely support. We kindly ask that all communications remain

Re: V35 WN50 Setback / Community Clinics



Info Ballinleegreenenergy <info@ballinleegreenenergy.ie>
To: marieclare.power@gmail.com

Reply Reply All Forward ...

Tue 26/08/2025 15:33

Follow up

If there are problems with how this message is displayed, click here to view it in a web browser.

Dear Ms. Power and Mr. Richmond,

Thank you for your email. We note your queries regarding turbine distances. Calculations are provided to the nearest proposed turbine and we do not offer distance checks to other turbines in the proposed project. When the planning application is submitted, you should be able to acquire this information from the material provided.

With regard to the clinic, we understand that the times offered this week do not suit your circumstances. To ensure flexibility for residents who were unable to attend this week, an additional clinic will be scheduled in the second or third week of September. The specific dates will be confirmed in the coming weeks. I will be in touch with you closer to the time to arrange an appointment at a time that works for you.

Kind regards,

Nadine

The Community Team at Ballinlee Green Energy

T +353 (0)61 975 200

A Station Road, Adare, Co. Limerick

E info@ballinleegreenenergy.ie | W www.ballinleegreenenergy.ie



Please note: Our Community Team is happy to assist with any project-related queries and is committed to providing helpful, respectful, and timely support. We kindly ask that all communications remain courteous and respectful. The Ballinlee Green Energy community team reserves the right to refrain from further correspondence in cases that violate our code of respectful engagement.

From: marieclare.power@gmail.com <marieclare.power@gmail.com>

Sent: Friday, August 22, 2025 8:10 AM

To: Info Ballinleegreenenergy <info@ballinleegreenenergy.ie>

Cc: 'JR ShotMeFirst' <jrmond@gmail.com>

Subject: RE: V35 WN50 Setback / Community Clinics

Hi Nadine,

Thank you for confirming the set-back. However you have not confirmed the distance of all proposed wind turbines as follows:

Appendix 7: NSL 4 beside the address of V35 WN50

This location is roughly 20 metres further back from where the closest turbine will be to our house, with dense foliage around it. There is a collection of mature trees on the other side of that hedge visible in

NML 4



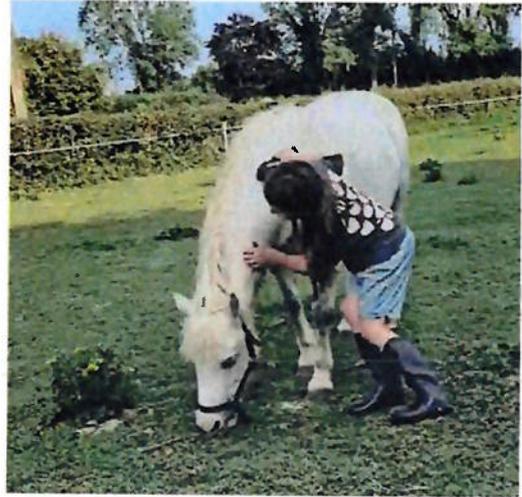
Figure 8: Appendix 13B- NML4 position beside dense foliage

Item 1 on the below google maps image is our home

Item 2 on the below google maps image was the location of this microphone



Appendix 8: Vivienne and Trigger



Appendix 9: Greensource state Wind Farms Are Usually Placed in Low Population Areas

As taken from <https://greensource.ie/wind-energy/> on 3rd October 2025.

Reference is made by Greensource to place Wind Farms in Low Population density Areas

Ballinlee Wind Farm is surrounded by 279 "sensitive receptors" within 1.5km. Is this what you call Low Density?



ONSHORE

Onshore wind energy is the power that is 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

Appendix 10: Historic Documents Knockuregaré

WhatsApp Image 2023-05-11 at 17.00.15 (1) (002).jpeg

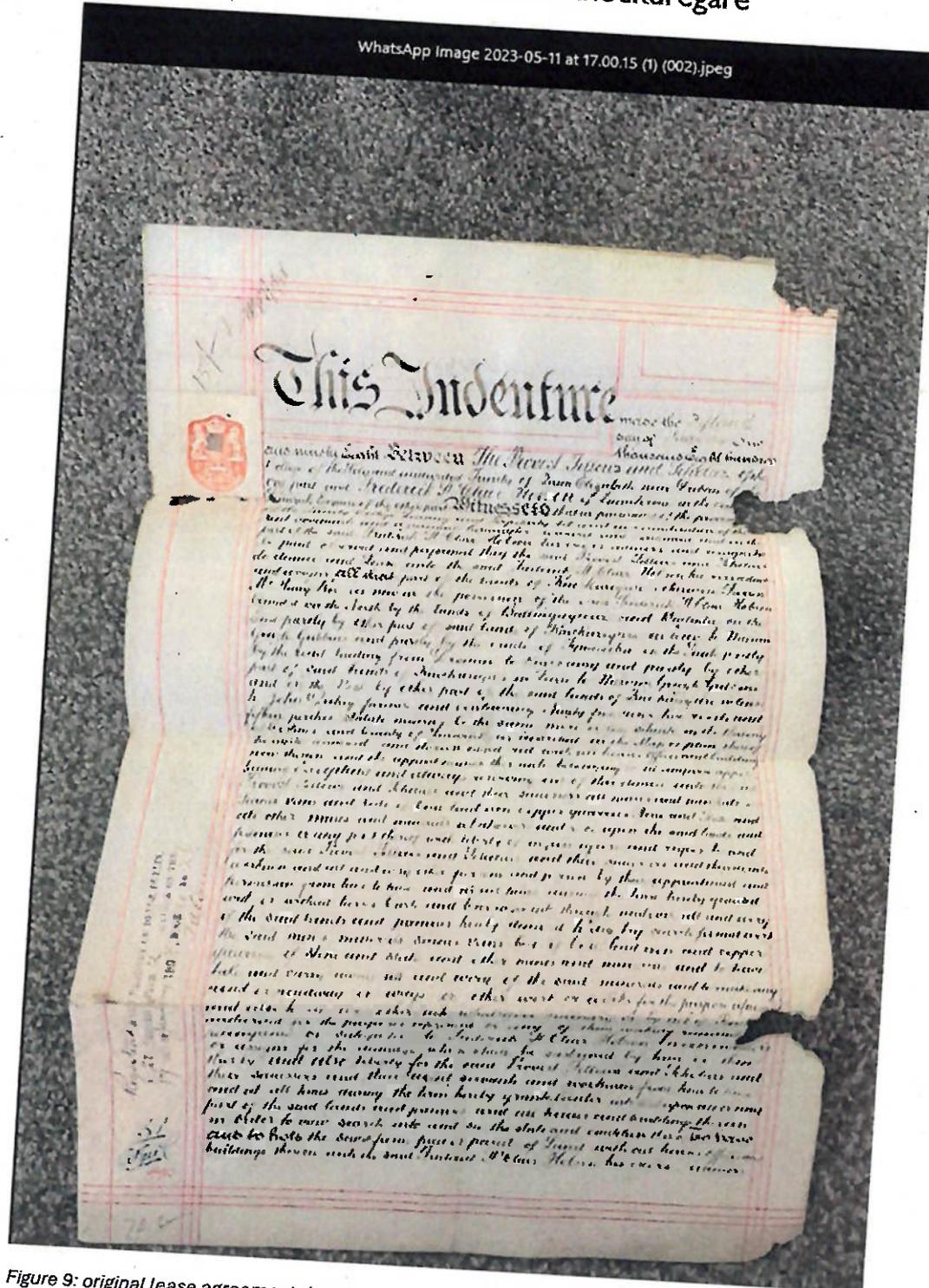


Figure 9: original lease agreement dated 17th January 1898 - registered in the Registry of Deeds which verified the owners were The Provost Fellows and Scholars of Trinity college Dublin

Registered in the Registry of Deeds, Dublin,
 at 12 o'clock on the 19th day of January 1898, Book No. 26
 19

I have the
 all other
 persons
 for the
 members
 between
 and it
 of the
 the said
 persons
 had an
 need a
 and at
 author
 accept
 or con
 family
 there
 and a
 part of
 in at
 sub
 build