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RE Case Number 323780

## 1. Introduction

I wish to object to the proposed Ballinlee Wind Farm and associated 110kV grid connection on the grounds that the Environmental Impact Assessment Report (EIAR) has not properly examined the **cumulative impacts** this project will have on our community, landscape, wildlife, and wellbeing.

This is not an objection against renewable energy, it is about **doing things properly, transparently, and in line with the law.**

The law requires that developments like this must consider the full picture how one project adds to the burden of others already built or approved nearby. Sadly, that's not what's happened here.

Under the **EU EIA Directive (2014/52/EU)** and Ireland's **Planning and Development Regulations (2001–2024)**, developers are legally required to describe the combined or cumulative effects of their project alongside others that exist, are approved, or are reasonably foreseeable.

The Ballinlee EIAR does not do that.

## 2. Where the EIAR Falls Short

### Noise and Shadow Flicker

The EIAR gives no real cumulative assessment of noise or shadow flicker. It models Ballinlee's turbines in isolation, even though there are several other wind farms within 15–20 km. There are **no cumulative noise contour maps**, no data on how low-frequency hum might combine with nearby turbines, and no mention of the **World Health Organisation (WHO)** guidelines for environmental noise and sleep disturbance (2018).

That failure means the EIAR cannot tell residents what living here will really sound or feel like day or night.

In law, *Sweetman v An Bord Pleanála (C-258/11)* confirms that interactive effects must be assessed together. This hasn't been done.

### Landscape and Visual

Chapter 12 of the EIAR claims that cumulative visual effects will be “imperceptible”.

That’s simply not credible. The **photomontages** fail to include key viewpoints where multiple turbine clusters would be seen together such as **Brackvoan, Athlacca, and the ridge above Bruff Hill.**

If you live here, you know these are some of the most visible vantage points in the Golden Vale.

The EPA’s **2022 Guidelines** are clear: developers must assess “key receptors where cumulative visibility overlaps occur.” That has not been done here.

Instead, the visual impact has been softened, and several images appear **artificially screened** by vegetation that doesn’t reflect the true openness of the land.

**This isn’t just a missed technical detail it’s a breach of trust with local people who deserve to see an honest portrayal of how their home landscape will change.**

### **Traffic and Transport**

The EIAR also fails to show how **construction traffic** from Ballinlee would interact with other regional projects or ordinary road use.

The roads around **Bruff, Athlacca, and Dromin** are narrow, winding, and already under pressure.

Yet there is no cumulative analysis, no clear timeline for overlapping works, and no safety plan for residents walking or cycling these routes despite the **TII (Transport Infrastructure Ireland) Guidelines (2021)** requiring this.

This means the EIAR underestimates both congestion and danger. Two years of heavy HGV traffic could make ordinary movement unsafe particularly for school children, farmers, and those who walk to work.

### **Wildlife and Ecology**

Cumulative effects on wildlife have been brushed over entirely.

The EIAR mentions Whooper Swans and bats but only assesses them in isolation, not as part of a wider ecological network.

There’s no proper mapping of **migration routes**, no winter bird survey beyond a single season, and no assessment of how multiple developments may fragment habitats across South Limerick.

That approach breaches the **EU Birds Directive (2009/147/EC)** and **Habitats Directive (92/43/EEC)**, both of which require a full account of cumulative disturbance on protected species.

### **Cultural Heritage**

Our heritage, too, is ignored in cumulative terms.

The EIAR doesn’t explore how the combined presence of several wind farms alters the setting of

historic townlands, **ringforts (fairy forts)** The Grange Stone Circle. and local monuments. Under the **National Monuments Acts 1930–2014** and **Limerick County Development Plan Policies CH 01–02**, these settings are legally protected.

To omit this is to disregard the living heritage that gives South Limerick its identity.

### 3. The Legal Framework They Ignored

Every one of these omissions goes against:

- **EU Directive 2014/52/EU**, which mandates assessment of cumulative and indirect effects;
- **EPA Draft Guidelines (2022)**, Section 9.3, which requires developers to show combined impacts;
- **Limerick County Development Plan 2022–2028**, Objective EN O27, which explicitly states that wind farms must demonstrate how they interact visually and environmentally with others nearby.
- **O’Grianna & Others v An Bord Pleanála (2014) IEHC 632**, which ruled that **a grid connection cannot be treated separately** from the main project.

The Ballinlee EIAR separates them, in clear breach of that case law.

### 4. Why This Matters

When developers fail to show the full cumulative picture, they misrepresent what life will really be like for the people who have to live with these turbines.

Cumulative impact assessment isn’t a box to tick it’s about fairness, transparency, and the right to know.

Without that information, local residents are left to object in the dark, and the planning authority cannot make an informed, lawful decision.

That breaches Ireland’s obligations under the **Aarhus Convention (ratified 2012)**, which guarantees public access to complete environmental information.

### 5. Request

For all of the reasons above, I respectfully ask **An Bord Pleanála** to **refuse permission** for the Ballinlee Wind Farm unless and until a legally compliant and transparent cumulative assessment is provided one that truly reflects how this development will interact with others in terms of noise, traffic, wildlife, landscape, and heritage.

Yours Sincerely

Mark Nagle

18<sup>th</sup> November 2025