

To: The Secretary

An Bord Pleanála

64 Marlborough St

Dublin 1

D01 V902

Re: Proposed Wind Energy Development by Ballinlee Green Energy Ltd. – Observation under Section 37E / Planning & Development Act 2000 (Case Number :PAX91.323780

Dear Sir/Madam,

We write as residents Mary and Tom Bulfin V35 DP84. My home is located within 1km of the proposed development by Ballinlee Green Energy Ltd. Case number 323780. I lodge this observation to draw attention to a number of concerns regarding the proposal and to request that An Bord Pleanála give full consideration to the issues outlined below.

Firstly, the website of the applicant, Ballinlee Green Energy Limited, states the following: ‘Ballinlee Green Energy is an innovative Irish renewable energy company based in Adare, Co. Limerick that specialises in the development of renewable energy projects, working with communities from pre-planning to operation, and creating long-lasting local partnerships. The project team has over twenty years development and operational experience.’

(<https://ballinleegreenenergy.ie/>)

Ballinlee Green Energy Limited was recently incorporated (August 2024) and is a subsidiary of Greensource Sustainable Developments Limited (‘GSDL’). GSDL has 13 subsidiary companies. There is no publically available information showing that this group of companies have completed or commissioned a wind farm development in Ireland. Many of the sister companies of Ballinlee Green Energy Limited have similar applications that are either at planning or appeal stages.

Additionally, research has shown that the ultimate parent company of Ballinlee Green Energy Limited, Temporis Limited, is domiciled in Malta whose largest shareholders are TMF International Pensions Limited (27.43%) and David Timothy Patrick Watson (43.10%). The Temporis Limited website is <https://temporiscapital.com>

We suggest the Bord question the accuracy of the statements on the Ballinlee Green Energy Limited website, as we have concerns with respect to the motivation for this development, whether the project team have the experience claimed and what their track record (if any) is with respect to residents and communities that live in close proximity to any previously completed developments.

Lack of Communication

The Aarhus Convention, to which Ireland is a signatory, underscores the importance of public participation in environmental decision-making. Article 7 of this convention grants us the right to be informed, to participate in decision-making processes, and to have access to justice in environmental matters. These rights are not to be taken lightly; they are fundamental to the democratic principles upon which our society is built.

We have been deprived of our rights to be active participants in a process that profoundly impacts our lives and environment. By failing to engage our communities, Ballinlee Green Energy has disregarded not only our rights but also the spirit of transparency and accountability that the Aarhus Convention seeks to promote. Our concerns and objections cannot be disregarded without fair and due process for all.

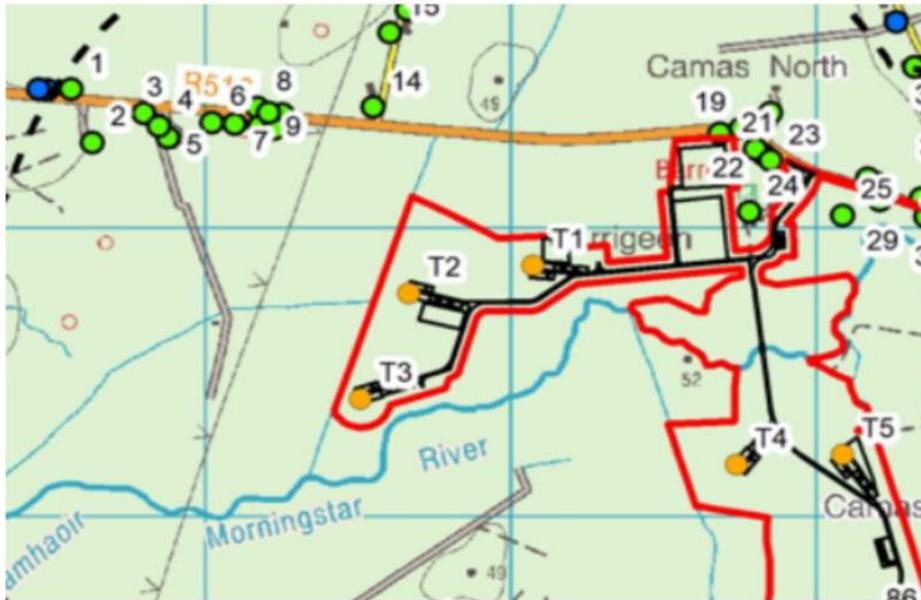
Impact on Landscape and Natural Beauty

- As a local resident here for most of my lifetime I have always enjoyed the natural beauty of the local landscape. The proposed turbines would dominate the rural skyline and permanently alter the scenic character of the area. The scale of the turbines (tip height 160m) and associated infrastructure (access roads, grid connection) will have a significant negative visual impact on the local landscape.

Shadow Flicker Breaching National Guidelines

- Our property lies just 1 km from turbine T2, with the applicant's own data showing **up to 127 days per year** and **36 minutes per day** of potential shadow flicker.
- This clearly **exceeds the limits** in the *Wind Energy Development Guidelines (2006)*, which recommend that shadow flicker should **not exceed 30 minutes per day or 30 hours per year** at any dwelling.

- Based on the figures provided (36 minutes × 127 days = over 76 hours per year), the proposal **breaches the existing national threshold**.
- Furthermore, the **Draft Revised Wind Energy Development Guidelines (2019)** propose a **zero-tolerance policy** for shadow flicker at existing dwellings, confirming that such exposure would be unacceptable.
- The turbine's proximity (1 km) may also fall within the "10 rotor diameters" distance where flicker risk remains significant for modern turbines with rotor diameters of 100–160 m.
- Shadow flicker:
 - The 2006 Wind Energy Development guidelines established that shadow-flicker at neighboring dwellings should not exceed 30 hours per year or 30 minutes per day.



· Our house is dwelling No. 5 shown above in green.

Noise Disturbance

- Both construction and operational noise, particularly low-frequency sound, will disrupt the peaceful rural character of the area and affect the health and wellbeing of my family .

Construction Traffic, Noise, Dust and Disruption

Construction traffic (especially heavy loads, increased wear on local roads, speed/duration) and maintenance traffic need clear management plans including hours of operation, routing, condition of roads, restoration of damage. No plans have been submitted to deal with these issues. We live on the R516 of the proposed delivery route. It is an already busy road with many school buses travelling every day to local schools: Bruff, Hospital, Kilmallock, Kilfinane, Croom and St. Josephs in Charleville. I use the road on a daily basis for walking and my grandchildren will use it for boarding the school bus. The road suffers from subsidence adjacent to where T1, T2 and T3 are proposed to be constructed and repair works have to be carried out to deal with this issue. Additional heavy goods vehicles required for the proposed construction will clearly cause more damage to this road which is needed for local access to our schools and local towns.

The Tionscadal Eireann Project Ireland 2040 states from figures released by the N/M20 Project **office show that the proportion of fatal collisions to all personal collisions on the N20 are four times higher than the national average.** In addition, the rate of personal injury collisions on the N20 is substantially higher than average, meaning drivers are more likely to be involved in a personal injury collision on the N20 than on other national roads in the country. When these collisions occur the traffic is then diverted on to our road the R516 which struggles with the volume of traffic on it already not taking into account the increase due to the transportation of materials for this proposed wind development. This raises serious concerns about the safety of residents and other road users of the R516.

Impact on Local Water Infrastructure

Pipelines from the local **group water scheme** run beneath the proposed access roads. Construction and turbine transport could damage this infrastructure, posing risks to quality and continuity of supply. **There has been no consultation with our local water scheme with regards to this proposed development.**



The scheme well and pumphouse (marked in red) are located at the junction between the R516, R511 and L1415, approximately 1.25km from the nearest turbine (T1). The water mains pipes run down the R511 and down the R512 (marked blue) to provide water to houses along R512 in the direction of Bruff until Dwelling 9 on Figure 15.3 of the Environmental Impact Assessment report supplied.

· The pumphouse and pipeline are located along the proposed turbine delivery route. We have significant concerns that the HGVs that will be travelling this route will cause extensive damage to the existing network and we ask the Bord, who is responsible for fixing these when that arises?

Flooding and Drainage Concerns

The site already experiences severe flooding. Additional soil disturbance and surface sealing may exacerbate runoff, further increasing flood risk locally and downstream. I attach a photograph of flooding in the area of T1, T2 and T3 which have been taken this November 2025.



- The above picture was taken on the morning of the 16/11/25 , view southwards from the R512 towards where T1 and T2 are proposed to be located.

Air Quality

As we only live 100 metres from the proposed construction route, we have serious concerns with regard to dust pollution and additional damaging fumes from the transportation of these heavy grade vehicles during the construction phase of the proposed development.

Biodiversity

The proposal threatens local habitats and may endanger **protected species** such as bats and birds. The development conflicts with Limerick County Council's biodiversity protection policy.

The area where T1.T2 and T3 are proposed to be constructed is an area very rich in flora and fauna. The scale of construction will certainly impact the habitats of so many plants and animals negatively. Some species eg bats are a protected species. Are the current ecological studies current and comprehensive? We would ask An Bord Pleanala to verify this. The Whooper swan in particular is a resident here every year and we are concerned that the mitigating factors are not sufficient to protect them



The above picture was taken on the morning of the 16/11/25 while walking along the R512. This clearly shows 5 Whooper swan, they are a common sight here.

- The above picture was taken on the morning of the 16/11/25 , view southwards from the R512 towards where T1 and T2 are proposed to be located.



- Above is an aerial view of where T1, T2 and T3 are proposed to be located which is currently flooded.

Alternative Proposals

- I submit that the Applicant has not sufficiently examined “reasonable alternatives” as required by the EIA Directive and Irish legislation.
- The Bord should require a full assessment of alternatives and justification of the chosen scenario. I propose that they look at the Foynes Wind Energy Hub on the Shannon estuary. This area is far more suitable than Ballinlee. The area is home to a community of people and too many homes are impacted.

- · Consideration should be given to more isolated areas to build this windfarm and therefore do not impact on so many families, communities which will have a negative impact on human, wildlife and flora health.
- · Given the scale of the proposal, we submit that the Bord should consider whether the site is the most appropriate location from an environmental, community and infrastructure viewpoint.

Primary Concerns

Biodiversity

We feel the proposed development would negatively impact the variety of flora and fauna species in our area and in particular the Whooper Swan

Shadow Flicker

As already outlined the shadow flicker from the turbines exceeds the 2006 guidelines.

Impacts on landscape and visual amenity

Construction of these turbines would destroy the beautiful natural landscape which we have always enjoyed

Flooding Concerns

We feel that construction of these turbines will further deteriorate the flooding which currently exists especially T1,T2 and T3.

Conclusion

We are not opposed to renewable energy and have solar panels installed ourselves which generate energy efficiently without negatively impacting the landscape, do not interfere with biodiversity

and infrastructure in our area and do not cause issues such as shadow flicker. We appeal to An Bord Pleanala to seriously take our concerns on board as your decision will have lifelong implications for us and generations to come,

Sincerely

Tom and Mary Bulfin.

