

Address

Ballinamona
Dromin, Kilmallock
V35 NN53

The Secretary,
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902
Case reference: PAX91.323780

Date: 14th November 2025

Re: 10 year planning permission for Ballinlee Wind Farm consisting of 17 no. wind turbines, a permanent 110kV substation and ancillary development. Located in Ballincurra, Ballingayrou, Ballinlee North & South, Ballinrea, Ballyreesode, Camas North & South, Carrigeen, Knockuregare, Ballybane and other townlands in County Limerick.

To Whom It May Concern,

We, Maurice & Betty Geary, write in connection with the above listed planning application at Ballincurra, Ballingayrou, Ballinlee North & South, Ballinrea, Ballyreesode, Camas North & South, Carrigeen, Knockuregare, Ballybane and other townlands in County Limerick.

We wish to object strongly to this proposal and ask that the Board refuse planning permission.

Some of our summarised observations and concerns are as follows:

Visual Impact and Cumulative Visual Impact

Although our home lies approximately 3.5 kilometres from the nearest proposed turbine, we share the same townland as several of the turbines and remain well within the Zone of Theoretical Visibility (ZTV) shown in the photomontages submitted with the planning application (Appendix 12A). The turbines, each reaching around 160 metres in tip height, will dominate the skyline even from several kilometres away due to the open, rolling nature of the Golden Vale landscape. This area is known for its scenic quality and pastoral heritage — visible from historic sites such as Lough Gur, Kilmallock, and Bruff — and is promoted by Fáilte Ireland for rural and Agri-tourism.

The Dromin Graveyard, where my family members are buried, is shown in the applicant's visual photomontages. From that sacred site, multiple turbines would be visible, and, on quieter days, the turbine noise would be audible. For families attending funerals, praying, or visiting loved ones, the sight and hum of turning blades will destroy the tranquillity that graveyards are meant to offer. This is an unacceptable intrusion on community and spiritual amenity.

The Ballinlee proposal cannot be viewed in isolation. Other nearby wind farm proposals, such as Garrane Wind Farm (ABP Ref: PC91.319139 / PAX91.323635), are within visual range. Together, these will create a continuous industrial skyline over the Golden Vale, fundamentally altering the character of this agricultural and heritage landscape. An Bord Pleanála has previously refused wind developments where cumulative visual dominance in sensitive lowland areas was deemed to cause "unacceptable harm to the visual amenity and character of the area."

Noise and Infra noise

Although 3.5 km from the nearest turbine, low-frequency noise and infrasound can travel well beyond the immediate vicinity of the site, especially in calm night conditions. The EIAR's noise chapter (Chapter 13) does not include receptor data at this distance, nor does it consider cumulative operational noise from the Ballinlee and Garrane turbines together.

Scientific literature (Baumgart et al., 2021; WHO Environmental Noise Guidelines 2018) acknowledges that infrasound and amplitude modulation from large turbines can cause sleep disturbance, stress, and adverse health impacts even at low measured decibel levels. The Irish High Court, in the Wexford wind farm nuisance case (*Webster & Rollo v Meenacloghspar Wind Ltd*, 2024), found that noise from only two turbines caused "unreasonable interference" with the enjoyment of property. If two turbines can cause such disturbance, the combined impact of seventeen turbines at Ballinlee — plus others proposed nearby — must be regarded as significant.

As a farmer, I am also concerned about the potential effects of continuous low-frequency vibration on livestock. Studies have reported altered feeding and breeding patterns in animals exposed to turbine noise and shadow flicker. The EIAR fails to address animal welfare or potential farm impacts in any meaningful way.

Distraction when Driving

The turbines will be visible along long stretches of the R512 and R516 regional roads, both of which are busy commuter and agricultural routes. Blade motion in peripheral vision is a known cause of driver distraction, particularly under low sunlight or during flicker conditions. Drivers towing livestock or heavy machinery are already at risk on narrow bends — adding moving, strobing elements in the skyline will only worsen safety.

The photomontages confirm that turbines will appear prominently on approach to Kilmallock and from the roads near Sherin's Cross in Dromin. There is no reference in the EIAR to driver-distraction studies, despite similar concerns raised in previous Irish wind-farm cases (see ABP Inspector's Report for Carrigcannon Wind Farm, Co. Cork, 2016).

Road Disruption from Grid Route

The proposed 110 kV underground grid route runs for over 26 km along the R516, R512, L1412, and L1170 — the same roads relied upon by residents, farmers, and emergency services. Appendix 2D of the planning documentation acknowledges temporary closures and stop/go systems on these rural roads.

These works will heavily disrupt travel for months. For ambulances and fire brigades responding to emergencies, especially cardiac or farm-accident cases, even a few minutes of delay can cost lives. The HSE National Ambulance Service has publicly stated that "road closures and traffic restrictions in rural areas directly impact response times." Yet there is no evidence that the developer has consulted the emergency services, nor is there a plan ensuring a minimum 3.5 m running width for emergency vehicles. With the high volume of HGVs during construction, it is certain that dust and vibration from HGVs will affect nearby homes and businesses, worsening local air quality and increasing accident risk.

Biodiversity

The Whooper Swan, a protected Annex I migratory species under the EU Birds Directive, is known to use this region of Bruff during winter months. The EIAR (Chapter 6 and Appendix 7D) acknowledges occasional sightings but bases its conclusion of "no significant impact" on a single season of survey data and high avoidance assumptions. We have seen these swans every year both in Lough Gur and in the carcass region around L1414.

Other Irish planning decisions (for example, the ABP Inspector's Report for Derryadd Wind Farm, Co. Longford) have recognised that whooper swans' predictable flight paths between feeding and roosting grounds make them especially vulnerable to turbine collisions. The proximity of turbines to wetland and lowland feeding grounds in the Golden Vale places this species at risk, particularly during low-light movements.

Livestock and farmland wildlife will also be affected by habitat disturbance, increased noise, and artificial lighting during construction and operation.

Planning Restrictions

There is growing evidence that proximity to wind farms can limit future planning opportunities for nearby landowners. The recent Rossestown, Co. Tipperary case (2024) highlighted how a local

woman's homebuilding application faced objection from a wind-farm developer who claimed her proposed dwelling was too close to existing turbines. This sets a concerning precedent for rural families like mine who wish to build homes for the next generation.

If Ballinlee is approved, my family's own land — within 3 km of the cable route and within sight of the turbines — could become the subject of future restrictions or objections, effectively devaluing the property and limiting development rights that have existed for generations.

Flooding

Appendix 9B (Flood Risk Assessment) admits that the cable route will cross areas of moderate to high fluvial flood risk, particularly along the R516 corridor. While the EIAR claims that road reinstatement will not alter drainage patterns, long trench excavations, backfilling, and construction traffic inevitably compact soil and reduce infiltration. In rural areas, this can lead to increased surface run-off and local flooding — something already familiar to residents after heavy rainfall events.

The EPA's 2022 Guidance on Climate Adaptation and Flood Risk requires developers to demonstrate no increase in flood risk elsewhere. No hydrological modelling for the trench route has been included. Given that these same roads provide the main emergency and evacuation routes for the area, any increased flooding risk is unacceptable. We would draw your attention to the below images taken on Wednesday 12th November 2025 on the R516 and Thursday 13th November 2025 on the L1414 which shows the area of this proposed development currently under water and we have not yet entered the middle of winter. How can such a development be undertaken in land prone to flooding like this and where will all this water go when drainage is so impacted with the huge amount of concrete poured into the ground?



L1414 Road Thursday 13th November 2025



R516 Road Wednesday 12th November 2025

Conclusion

This development would fundamentally alter the visual, environmental, and social landscape of our community. Even at 3.5 km from the nearest turbine, its cumulative effects — visually, aurally, and emotionally — will be deeply felt.

The intrusion upon Dromin Graveyard, the disruption to daily farm life, the threat to animal welfare and local tourism, and the road chaos that the grid works will cause are all deeply concerning. Planning permission should only ever be granted where the balance of benefit outweighs harm. In this case, the harm to our landscape, health, and heritage is undeniable and lasting.

We strongly urge that this development be rejected for the reasons outlined above.

We request that for an Oral Hearing in relation to this wind farm application, for the reasons outlined above. In particular the proximity and impact this will have on Lough Gur, an architectural and archaeological site of international importance, and the impact on our Golden Vale's High Value Landscape. Furthermore, the scale of the project and the pattern of population distribution which will have widespread impact on our local community.

Kind Regards,

Maurice & Betty Geary