

# Submission of Objection to Planning Application: Ballinlee Green Energy Wind Farm Development

## To:

An Coimisiun Pleanala  
Case Number 323780  
<https://online.pleanala.ie/en-ie/sid/observation>

## From:

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09/10/2025

**Subject: Formal Objection to Proposed Construction of 17 Wind Turbines (160m height, 70m blade diameter) by Ballinlee Green Energy in the Bruff, Dromin, and Athlacca Area**

## I. Introduction

I wish to formally object to the proposed wind energy development by Ballinlee Green Energy, which involves the erection of **17 wind turbines**, each reaching a height of **160 metres** with a **70-metre blade diameter**, within the vicinity of **Bruff, Dromin, and Athlacca** in County Limerick.

This objection is based on four critical concerns:

1. **Health implications** associated with noise and low-frequency emissions.
2. **Shadow flicker** and its impact on quality of life.
3. **Environmental risks**, particularly to the **Whooper Swan (Cygnus cygnus)**, a protected migratory bird species.
4. **Regulations with regards to distance from the nearest turbine to a dwelling house are vague due to lack of proper legislation.** Guidelines from 2006 and updated guidelines from 2019 are not adequate to protect our community and environment.
5. **Inadequate public consultation and transparency.** Ballinlee Green Energy have refused to meet our community as a group to discuss our concerns, despite being invited to numerous community meetings.
6. **Devaluation of my Property**

## **I. Health Implications for Residents**

Multiple peer-reviewed studies and international health bodies, including the **World Health Organization (WHO)**, have raised concerns about the potential impacts of wind turbine noise, particularly low-frequency noise and infrasound, on human health.

- **Sleep disturbance, stress, and headaches** have been documented among individuals living in close proximity to large turbines.
- The proposed turbine height (160m) and scale (17 units) dramatically increase the acoustic footprint of this development.
- The **Environmental Impact Assessment (EIA)** should include a **detailed, independent health impact study**, which we believe has not been adequately conducted or shared with the public.

Given the residential nature of parts of the Bruff-Dromin-Athlacca area, this proposal poses a **serious risk to public health and wellbeing**.

## **II. Shadow Flicker and Visual Intrusion**

Shadow flicker occurs when rotating turbine blades cast moving shadows, which can result in intense and repetitive flashing inside homes.

- This is especially problematic for individuals with **photosensitive epilepsy, autism, and mental health conditions**.
- The **WHO** recommends strict limits on flicker exposure, yet developers often base models on theoretical weather and sun patterns, not local lived experience.
- Given the proximity of the proposed turbines to homes in the area, residents are at risk of **daily flicker exposure** during certain times of the year.

This is a clear **breach of quality of life** and raises concerns under **Article 8 of the European Convention on Human Rights** (right to respect for private and family life).

## **III. Impact on Wildlife: Threat to the Whooper Swan Population**

The **Whooper Swan** (*Cygnus cygnus*) is a migratory species protected under the **EU Birds Directive (2009/147/EC)** and listed as a **Special Protection Interest** under the **EU Natura 2000 network**.

- The Bruff-Dromin-Athlacca area is part of the migratory path and wintering grounds for Whooper Swans.
- These birds are highly sensitive to disturbance and habitat alteration. Wind turbines have been shown to:

- Disrupt **flight paths**
- Increase risk of **collision mortality**
- Cause long-term **habitat displacement**
- The proposed development lies within proximity to wetlands and agricultural fields commonly used by Whooper Swans for feeding and roosting.

The failure to fully assess the impact on **protected species** could render the application in breach of **EU environmental law**, including the **Habitats and Birds Directives**.

**IV.** There is no proper legislation in relation to how far a turbine must be from a dwelling house. The 2006 guideline and the updated 2019 guideline are merely guidelines which means there is NO regulation on where these turbines can be erected.

## **V. Inadequate Public Consultation and Transparency**

Many residents report a lack of:

- Sufficient public meetings or information sessions
- Direct communication regarding environmental and health risks
- Access to comprehensive EIA and independent assessments

This undermines the **principle of public participation in environmental decision-making**, a right enshrined in the **Aarhus Convention**.

**VI.** I am a pensioner living in Ballinrea. I bought my house in 2006. I will need to downsize my residence in a couple of years. If Ballinlee Wind Farm is constructed and I am at best 1000m from the nearest wind turbine, this will devalue my property or at worse make it unsaleable.

## **VII. Conclusion**

Given the serious concerns outlined above, I respectfully urge the planning authority to:

- **Refuse permission** for the development as currently proposed, OR
- **Demand a full independent Environmental and Health Impact Assessment**, including specific studies on:
  - Shadow flicker modelling
  - Low-frequency noise effects
  - Avian impact assessments (specifically Whooper Swan flight paths and habitats)

This proposed wind farm, while potentially beneficial for renewable energy targets, **must not proceed at the expense of local health, biodiversity, and environmental integrity.**

**Signed:**

Michelle Dempsey  
09/10/2025