

Brackvoan

Bruff

Co. Limerick

The Secretary,
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902

Case reference: PAX91.323780

Date: 17th November 2025

Re: 10-year planning permission for Ballinlee Wind Farm consisting of 17 no. wind turbines, a permanent 110kV substation, underground electric cabling systems between the wind farm site and connection point at existing Killonan 220/110kV substation, and ancillary development. Located in Ballincurra, Ballingayroure, Ballinlee North & South, Ballinrea, Ballyreesode, Camas North & South, Carrigeen, Knockuregare, Ballybane and other townlands in County Limerick.

To Whom It May Concern,

We, *Mick & Edel O'Hara*, write in connection with the above listed planning application at Ballincurra, Ballingayroure, Ballinlee North & South, Ballinrea, Ballyreesode, Camas North & South, Carrigeen, Knockuregare, Ballybane and other townlands in County Limerick.

We recognise the importance of wind energy in meeting Ireland's National renewable energy targets and addressing climate change. However, this development is unsuitable for this location and fails to take proper account of the environmental, social, and cultural impacts on the local area.

This wind farm would permanently alter the rural character of the area and expose nearby residents to health and amenity risks, devalue local properties, and threaten the long-term sustainability of our community. For these reasons, we ask that the Board refuse planning permission.

Some of our summarised individual observations and concerns are as follows:

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On The Matter of Proximity to Bruff

Bruff (***Our Town, Our Home***) is a wonderful place. It lies in the heart of the Golden Vale, a rich and fertile area known for its agricultural land, particularly dairy farming.

History and Heritage

Our town of Bruff has a deep historical background that goes back centuries. It is believed to have been established in the early medieval period. The town's name likely derives from the Irish word Brú (meaning a house or a dwelling place). Over the years, it has seen influences from both the Gaelic and Anglo-Norman cultures.

One of the more notable historical sites near our town is Bruff Castle, a 12th-century Norman structure. The castle was built by the Norman invaders and served as an important stronghold in the region. There is also Saint Mary's Church in Bruff, a beautiful example of Irish ecclesiastical architecture.

In addition to its medieval history, our town of Bruff is also linked with the Irish Rebellion of 1798. Bruff was a focal point during that time and has a number of memorials and sites commemorating the struggle for Irish independence.

Modern-Day Bruff

Today, our town can be found as a peaceful, picturesque destination. It serves as a service centre for the surrounding rural areas, offering shops, pubs, schools, and recreational facilities. It's an excellent place for those in the community, especially to rear a family.

Attractions and Local Life

Walking and Nature: The surrounding countryside is perfect for walking and exploring. The Golden Vale offers stunning views, rolling hills, and quiet lanes, ideal for anyone who enjoys hiking or cycling with the Ballyhoura's a short drive.

Local Festivals and Events: Bruff is known for its community spirit, and the town hosts a variety of events throughout the year. One of the highlights is the Bruff Festival, which typically includes music, food, and cultural activities, drawing both locals and visitors.

Bruff GAA: Like many towns in Ireland, Bruff has a strong connection to Gaelic sports, with the Bruff Camogie and GAA clubs being an integral part of the community. The club is active in both camogie, hurling and Gaelic football.

Nearby Attractions: If you're exploring the area, there are several notable places nearby, including the historic Lough Gur—an ancient archaeological site—and Adare, often called Ireland's prettiest village, which is just a short drive away.

Bruff combines rich history, a strong sense of local community, and beautiful surroundings. It's a perfect example of a traditional Irish town, offering a ***peaceful lifestyle*** with plenty of ***heritage and natural beauty***.

Impact of This Development on The Town of Bruff

What is being proposed here is essentially the erection of massive and entirely unsuitable industrial scale structures *effectively on top of the town of Bruff*. If granted permission this will immediately and permanently detract from everything that makes Bruff a beautiful place to live as well as impact local residents with some of the following being legitimate concerns:

Noise

Large wind turbines can generate continuous mechanical and aerodynamic noise that our family and other nearby residents (dozens and dozens of homes and families!) will find extremely disruptive, especially at night when background sound levels are low. We have concerns (which are commonly reported in other areas where wind farms are in operation) around ***sleep disturbance, reduced quality of life, and stress*** related to the persistent “***whooshing***” or ***low-frequency vibrations***. It is a well-known fact that ***stress can contribute to illness and poor health***. We are also worried that noise levels could increase as turbines age or during certain wind conditions, leaving us with an unknown in terms of our family’s long-term exposure and potential effects on our wellbeing.

Health

Following on from the previous point and to reiterate, we are extremely concerned that living near these large wind turbines could affect our family’s health, primarily through noise-related issues such as ***sleep disruption, stress***, or annoyance from ***persistent sound or shadow flicker***. We do not know how our family and other families will react to the environment with these turbines in operation from a physical, mental or general health point of view as opposed to any direct physical harm from turbines but once the turbines are constructed, it will be too late for anyone who suffers negative effects and that will include both adults and children. Scientific reviews acknowledge that poor sleep and chronic stress, when they occur due to living in close proximity to wind turbines can indirectly influence wellbeing. These turbines are far too close to a significant number of family homes and to the town of Bruff.

School

The fact that these massive turbines are located so close to Scoil Dean Cussen national school causes us significant worry. There is the potential for noise distraction that could interfere with learning, as well as our concern about shadow flicker affecting classrooms and outdoor play areas. We also object to these massive structures being so close to our local national school given the visual dominance of the structures. These can be very disturbing for children with additional needs due to their imposing nature because of their sheer scale.

Proximity to Dwellings

Home Valuation Impact

The following is my analysis and, in my opinion, a realistic estimation of the value destruction in terms of property valuations in the area that will occur as a consequence of the construction of these industrial scale wind turbines.

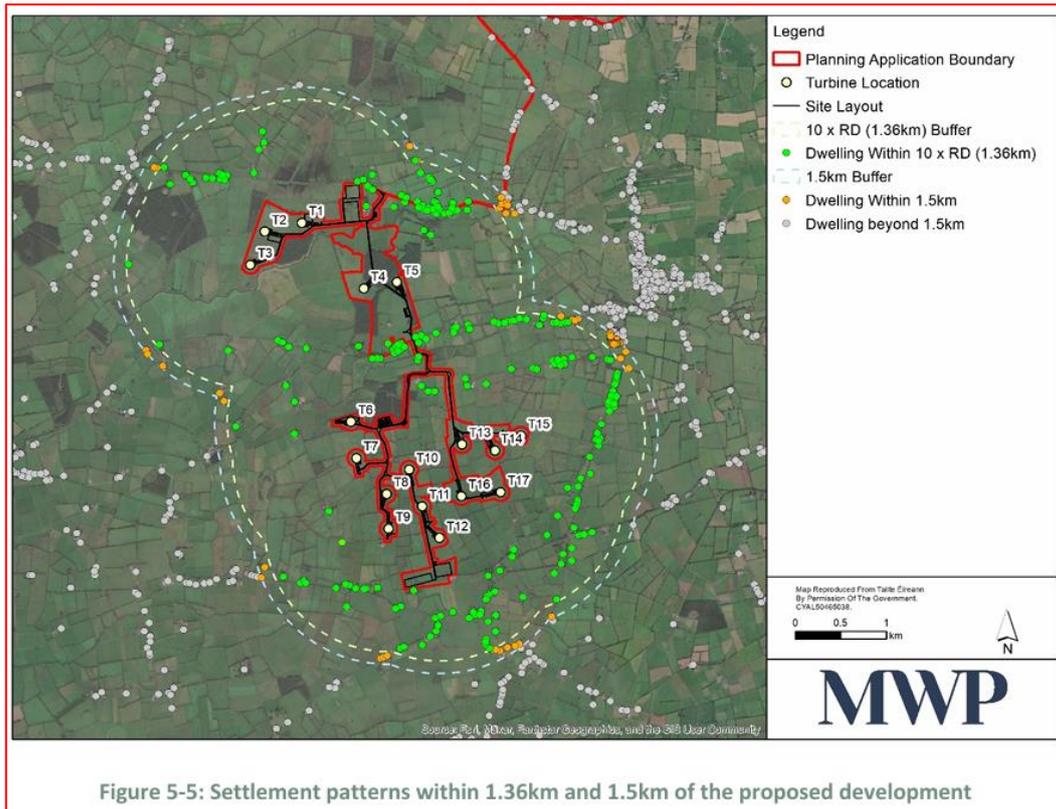


Figure 1: As It Pertains to Property Value Destruction – Extract from Planning Application document: Environmental, Volume II - Main EIA, Chapter 05 - Population and Human Health.pdf; Settlement Patterns

Referring to Figure 1, the number of houses in each zone is:

- Zone1 → 179
- Zone2 → 228
- Zone3 → 279

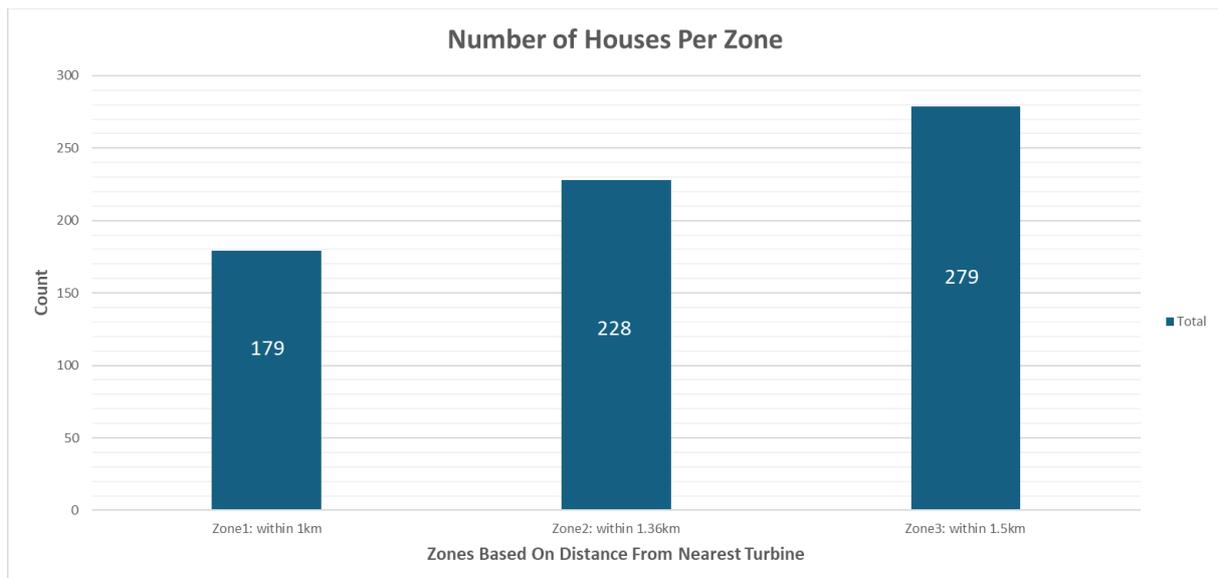


Figure 2: Number of Houses Per Zone; Determined by Distance from Nearest Wind Turbine

The following assumptions are made and considered a reasonable approach for the purpose of this devaluation estimation exercise:

3 Price Ranges Applied with Specific Proportions:

10% → €240,000 to €315,000

85% → €315,000 to €420,000

5% → €420,000 to €500,000

Prices Within Each Band Follow a Normal Distribution (bell curve):

Mean = midpoint of the band

Std dev = (range / 6) → keeps ≈99% inside bounds

Prices, House Numbers, and Zone Assignments Are All Randomized Independently:

House Counts by Zone Stay Fixed:

Zone1 → 179

Zone2 → 228

Zone3 → 279

Estimated Devaluation Rates as Follows:

Zone1 → 15%

Zone2 → 5%

Zone3 → 5%

In terms of the house price bands, these are based on the revenue LPT property valuation guide/tool with some allowance for properties that may be above the band indicated on this guide. If anything, this exercise probably underestimates the likely value destruction if this development proceeds.

Instructions
We have used the Property Location that you entered on the My Property screen to zoom into this area.

1. Use the map controls to zoom in further as required to a smaller area.
2. Click on this area of the map to see the average property valuation band for your area.

You can use the "Highlight Bands" slider on the top right of the screen to make the underlying map details more or less visible.

You can also use the map controls to move to a different area of the country to display average property valuation bands in that area.

Valuation Bands

1:	€1 - €240,000
2:	€240,001 - €315,000
3:	€315,001 - €420,000
4:	€420,001 - €525,000
5:	€525,001 - €630,000
6:	€630,001 - €735,000
7-20:	Over €735,001

More information

- [Further guidance on using this valuation tool](#)
- [Link to Residential Property Price Register](#)

Property location:

Property Information

Local Authority:: Limerick City and County Council
Electoral District:: BRUFF
Small Area Identifier:: 127031003
Valuation Band:: 2: € 240,001 - 315,000

Esri, Intermap, NASA, NGA, USGS | Esri UK, Esri, TomTom, Garmin, GeoTechnologies, Inc, METI/NASA, USGS Powered by Esri

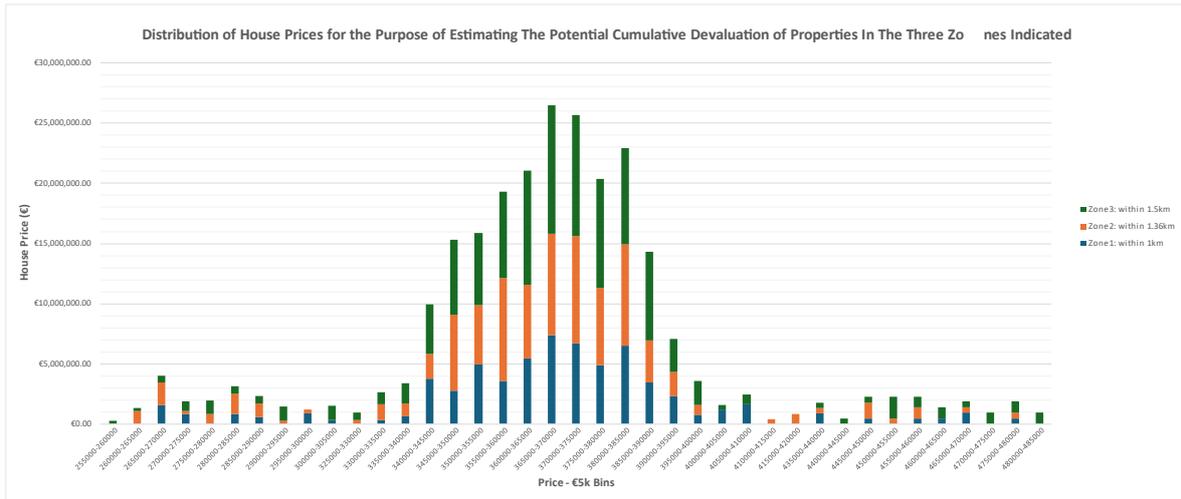


Figure 3: Distribution of House Prices for the Purpose of Estimating the Potential Cumulative Devaluation of Properties in the Three Zones Indicated

When the cumulative figures are analysed, the following estimations are arrived at.

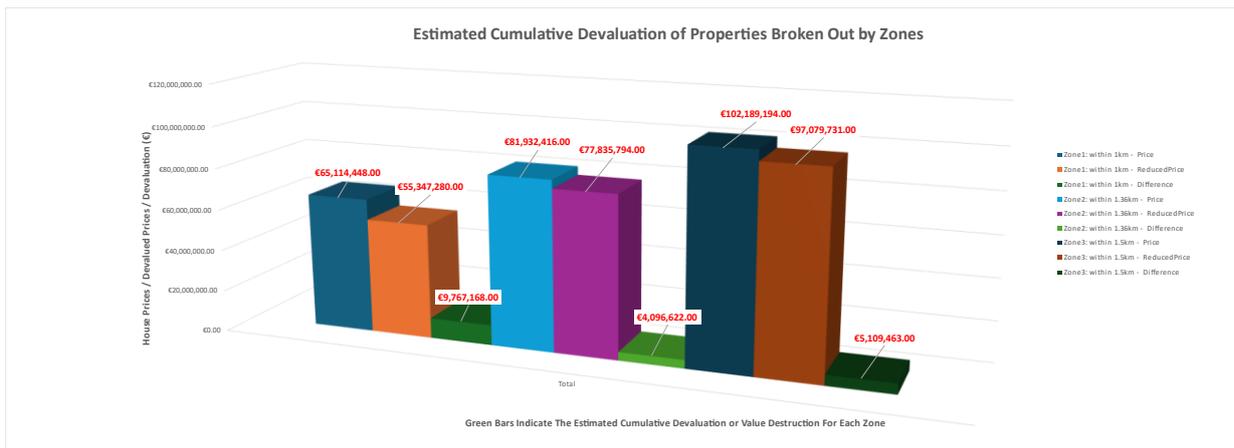


Figure 4: Estimated Cumulative Devaluation of Properties Broken Out by Zones

Figure 4 shows that when all three zones are summed in terms of the estimated devaluation, the estimated value destruction that will likely occur in this area of Bruff town, in terms of private dwelling property values alone, is **€18,973,253.00**.

We strongly object to this development being permitted to proceed when such devastating impacts will be experienced by the local community and their families with massive family net wealth destruction in the short term and in the years ahead.

Restrictions on Future Development

Will the company/windfarm operator have a broad veto on development on a large swathe of land surrounding these turbines and the supporting infrastructure, whether above or below ground? If so, this will have a detrimental impact on the town of Bruff into the future.

Impact on Population Numbers

We are very concerned that not being able to develop tens of acres of land (which could be used for new homes) around Bruff can have wide-ranging implications for the town's future growth and vibrancy. Assuming each acre could accommodate several semi-detached homes, restrictions on development limit the number of new homes available, making it harder for young families to settle in the area. This can lead to a declining or stagnating population, particularly among younger residents, which in turn affects schools that may see reduced enrolments and sporting clubs or community organizations that rely on active participation from local families. Local businesses may struggle to expand or attract staff, as there are fewer residents to serve and a smaller labour force. Without the ability to develop new homes on suitable land, without an ever-present embargo, over time, Bruff risks losing economic dynamism, community engagement, and the ability to sustain essential services, creating a cycle that discourages both investment and long-term settlement.

Impact on Local Agriculture

My father-in-law farmed the land around this area all his life as his father did before him. We are very concerned about the likely impact to local agriculture. All the studies in the world and mitigation efforts can fall short and the result could be devastating for local farmers if things go wrong in terms of wildlife displacement etc. This development on agricultural land raises several major concerns for the Bruff farming community. Large turbines will disrupt the natural environment, potentially altering the behaviour and grazing patterns of livestock, which may stress animals and reduce productivity. Changes in land use and movement of livestock between paddocks or wild animals during construction can also increase the risk of disease transmission, including bovine tuberculosis (TB), by bringing carrier animals into closer contact with livestock. These factors combined may affect both the health and productivity of livestock, posing economic and operational challenges for farmers. The question of future development restrictions is also one that looms large over the heads of every farmer in the vicinity of this proposed development and that is a major concern for everyone.

On The Matter of Archaeology & Heritage

Lough Gur is located just a short distance from Bruff. It is one of Ireland's most significant and fascinating archaeological sites. It's an area steeped in history, with evidence of human settlement dating back over 6,000 years. The combination of natural beauty and ancient heritage makes Lough Gur a ***unique and important site***. It is estimated that over **50,000** people visit the area annually. This number includes both local visitors and *tourists* from abroad who come to explore the archaeological and natural beauty of the site.

Early History and Archaeology

Lough Gur is notable for its **archaeological significance**, particularly because it contains evidence of some of the earliest human activity in Ireland. The area has been inhabited for thousands of years, and numerous prehistoric sites have been uncovered around the lake.

1. **Mesolithic and Neolithic Periods:** Evidence of early Mesolithic (Middle Stone Age) people has been found around Lough Gur, suggesting that hunter-gatherers were present here around 8,000 years ago. By the **Neolithic period** (around 4,000 BCE), farming communities had settled around the lake. They built megalithic tombs and stone circles, some of which are still visible today.
2. **Stone Circles and Tombs:** One of the most famous features of Lough Gur is its **stone circle**—one of the largest in Ireland. The circle, known as the **Lough Gur Stone Circle** or **Grange Stone Circle**, is made up of 113 stones and is believed to have been constructed during the late Neolithic or early Bronze Age. This circle is thought to have had both ceremonial and astronomical significance, possibly being used for rituals related to the sun or moon, as similar stone circles were across Europe.

In addition to the stone circle, there are several **portal tombs** (megalithic tombs) scattered around the area. These ancient tombs, like the **Tomb at Knockroe**, are significant examples of Ireland's early burial practices.

The Bronze and Iron Ages

During the **Bronze Age** (around 2,000 to 500 BCE), the area around Lough Gur continued to be a centre of activity. Archaeological excavations have revealed evidence of metalworking, pottery, and other artifacts that demonstrate the technological advancements of the time. The site was likely a key location for trade and ritual.

In the **Iron Age** (500 BCE to 400 CE), the lake and surrounding areas were still inhabited, and the rise of Celtic culture brought new influences. The Celts are believed to have used the area for ceremonial purposes, and it is likely that some of the structures and artifacts we associate with the early Iron Age were created by them.

Early Christian and Medieval Periods

As with many ancient sites in Ireland, Lough Gur saw a continuation of use through the **early Christian period** (around the 5th to 12th centuries). While there is less direct evidence of Christian settlements, the area's strategic location near the Shannon River made it a key location for trade and communication during this time.

By the **medieval period**, Lough Gur had become part of the territory of the **O'Briens**, one of the most powerful Gaelic families in Munster. The O'Briens built fortifications in the area, but much of the medieval activity has been overshadowed by the earlier prehistoric remains.

Folklore and Myths

Lough Gur is also steeped in **Irish folklore**. In the local legends, it is often depicted as a place of magic and mystery. One of the most famous stories is that of the "**Lady of Lough Gur**", a mysterious figure said to reside in the waters of the lake. The lake has long been associated with the Otherworld, a mystical realm in Irish mythology.

The **Gur** in the name *Lough Gur* is believed to be derived from the Irish word *gúr*, meaning "a trick" or "a deceit," hinting at the lake's association with mystical and deceptive qualities in Irish folklore.

The 19th and 20th Centuries

In the **19th century**, Lough Gur became more known as a place for **tourism** and exploration. The development of the local area, with improved roads and infrastructure, made the site more accessible. During this time, local antiquarians and archaeologists began to study the site in greater detail, uncovering many of the archaeological treasures that have since become part of Ireland's national heritage.

The **Lough Gur Visitor Centre**, established more recently, provides educational resources and guided tours, making it easier for visitors to learn about the site's rich history and the ongoing archaeological work being done to preserve it.

Modern-Day Lough Gur

Today, Lough Gur is not only an important archaeological and historical site but also a popular **tourist destination**. Visitors can explore the lake and ***its surrounding landscape***, which has been designated as a ***protected area*** due to its ***archaeological importance***.

- The **Lough Gur Interpretive Centre** is a great place to start, offering exhibits on the history of the area, including a large collection of artifacts from the prehistoric and medieval periods.
- There are numerous **walking trails** around the lake, with information points along the way that explain the significance of the various monuments, including the stone circle, megalithic tombs, and early Christian sites.
- The lake itself is beautiful and ***serene***, with opportunities for **boating** or **fishing**. It's also a great spot for nature lovers, with a variety of wildlife, especially bird species.

Lough Gur ***offers a rare chance to connect with Ireland's ancient past***, and its combination of historical, cultural, and natural features makes it a must-visit for anyone interested in the rich heritage of the country.

In summary, Lough Gur is a site of great **archaeological, historical, and cultural significance**. From its prehistoric stone circles to its Celtic myths, the area provides a fascinating glimpse into Ireland's distant past, while its tranquil beauty continues to captivate visitors today.

Impact of This Development on The Archaeology & Heritage of The Area

The introduction of large wind turbines near scenic or historically significant sites like **Lough Gur** will have several negative impacts, particularly since they will be clearly visible on the horizon. The aesthetics of these massive structures, when visible from a unique and important site like Lough Gur, will have an immediate and lasting effect and will undoubtedly leave a negative impression with the 1000's of tourists who visit the site every year. Although this development may take years to complete, if given the go ahead, when compared to the age of this site, effectively, in the blink of an eye, this wonderful amenity and place of historical significance will be changed forever and for the worse. Here is some more detail of the potential negative impacts of visible wind turbines in this area:

1. Visual Impact on the Landscape

One of the primary concerns would be the **visual intrusion** of large wind turbines on the natural and cultural landscape around Lough Gur. The lake is known for its **tranquil beauty** and rich history, and its setting in the Golden Vale contributes to its appeal. Large turbines, especially if positioned on the horizon, could dominate the landscape, altering the scenic views that draw tourists and nature enthusiasts. This would impact:

- The **aesthetic value** of the area, as Lough Gur is part of Ireland's cultural and natural heritage.
- The **sense of place** and the **natural character** of the environment, which could affect the experience of visitors and residents alike.
- The **viewpoints from historical sites** like the stone circle, megalithic tombs, and the surrounding walking trails, which rely on the natural beauty of the area to create an immersive, historical atmosphere.

2. Cultural and Heritage Concerns

Lough Gur is an **archaeological treasure trove**, with thousands of years of history, from prehistoric to medieval times. The introduction of visible wind turbines could:

- **Undermine the integrity** of the landscape's historical context, especially if the turbines are placed within viewing distance of important sites like the stone circle or burial tombs.
- Diminish the **cultural experience** for visitors who come to engage with Ireland's ancient heritage in a peaceful, natural setting.
- Interfere with **archaeological preservation efforts**, as the turbines could distract from the significance of these monuments, or *lead to perceptions that modern development is encroaching on protected heritage sites.*

3. Negative Effect on Tourism

Tourism in County Limerick, particularly in areas like Lough Gur, often draws people seeking both cultural experiences and outdoor activities in an unspoiled environment. The introduction of large, industrial-scale wind turbines might have the following effects:

- **Reduced appeal** for tourists, particularly those interested in rural and historical sites. Many visitors seek out these locations precisely for their sense of serenity and natural beauty. The sight of large turbines might diminish the area's attractiveness to those interested in heritage tourism or eco-tourism.
- A **shift in visitor demographics**, with some visitors avoiding the site if the turbines are seen as *an eyesore or if they feel that the area has been altered from its traditional charm.*

- **Negative publicity:** If wind turbines were placed near Lough Gur, it **will** spark debates over the clash between **renewable energy** and **cultural heritage**, potentially leading to negative press coverage and discussions that harm the town's or region's image.



Figure 5: Extract from Planning Application document: Environmental, Volume IV – Photomontages, Ballinlee Photomontages Book 2; Lough Gur Viewpoint Ref: VP19

The image in Figure 5, which purports to show the visual impact at the key Archaeological and Heritage site of Lough Gur, is extremely deceptive. If certain guidelines/recommended practices are being followed here in order to take this picture and others like it, that's just the way it is I guess, but why is it that it seems to be designed in such a way as to appear to minimize the actual negative impact of the turbines. *Let me illustrate how this is the case with this particular photo.* While this does appear to be Lough Gur, I would refer to it personally as a cluster of foliage and bushes at Lough Gur. Refer to the images on the following pages to see the actual Lough Gur that tens of thousands of visitors come to see every year, even if they do also enjoy gazing at the foliage and bushes in Figure 5.



Figure 6: The Real Lough Gur on a Cold January Morning – Image 1; Vantage Point #1



Figure 7: The Real Lough Gur on a Cold January Morning – Image 2; Vantage Point #1



Figure 8: The Real Lough Gur on a Cold January Morning – Image 3; Vantage Point #1



Figure 9: The Real Lough Gur on a Cold January Morning – Image 4; Vantage Point #1

It is not hard to imagine how industrial scale wind turbines, sitting, menacingly on the horizon, will utterly destroy this unbelievable treasure.

We would actually implore whoever will have any input to the decision on this development to visit this location some cold, crisp winter morning and trek up to this viewing location, which is accessible by a stone path and just breath in this view. It will be worth it. But, if no-one involved in this application decision chooses to visit this amazing place, then all we can do is ask that you not allow this to be destroyed for the people of Bruff, the surrounding areas and for the thousands of visitors who come here every year.



Figure 10: The Real Lough Gur on a Cold January Morning – Image 5; Vantage Point #1



Figure 11: The Real Lough Gur on a Cold January Morning – Image 1; Vantage Point #2

As I pointed out earlier, the photo in Figure 5 does not clearly show the likely devastating impact the turbines will have on this location. The photo could even have been taken at the same elevation, but with photographer positioned more to the left to show the actual lake, and not a cluster of foliage and bushes. There are even elevations from which to take a photo that sit between the height in Figure 5 and Figure 11 for example. In any case, I'm sure it was a simple error of judgement on behalf of the photographer, but we have illustrated the **true beauty of Lough Gur and why it must be retained at all costs.**

On The Matter of Visual Impact

Referring to *Planning Application document: Environmental* → *Volume II - Main EIAR* → [Chapter 12 - Landscape and Visual.pdf \[PDF\]](#)

This document is an interesting piece of academic work that ultimately ignores the true impact at a community level of these massive turbines, if constructed. It also somehow avoids designating any visual impact in any category as *Very High*. This is truly astonishing given the fact that we are discussing structures that are 160m at the tip, and where there are 100's of residents living in such close proximity to the proposed location of construction of these turbines.

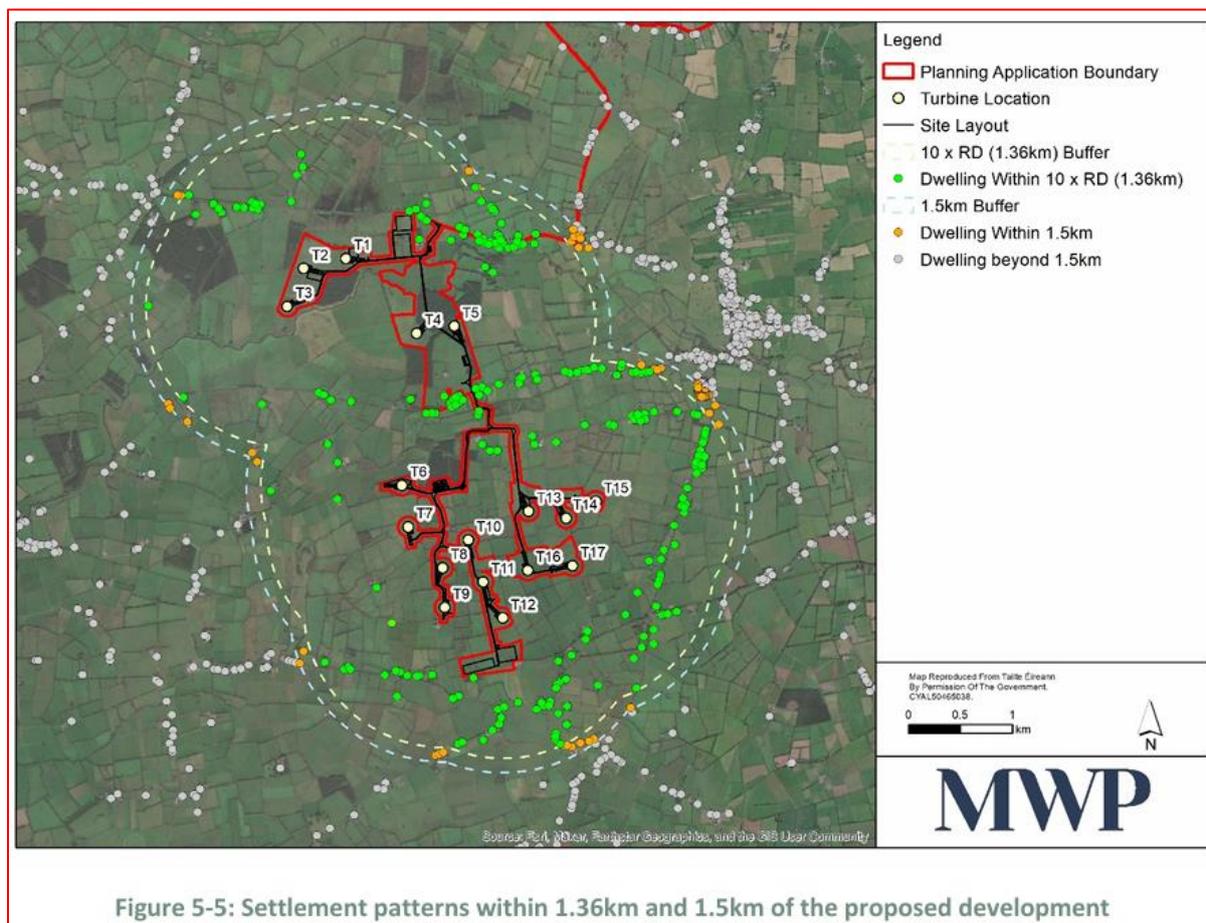


Figure 12: Extract from *Planning Application document: Environmental, Volume II - Main EIAR, Chapter 05 - Population and Human Health.pdf; Settlement Patterns*

Referring to Figure 12 above, considering the significant number of dwellings in close proximity to this development and when viewed along with the criteria in Figure 13 and their associated descriptions, it is astonishing, and telling, that the conclusion in terms of the *Sensitivity of Local Community Views (LCV)* (Figure 14) is **Medium-Low**. This is why I maintain that this document is a piece of academic work that uses selective criteria to determine what *Sensitivity of Local Community Views* should mean, and in my opinion, so as to reach a ridiculous conclusion that minimizes the actual impact on local residents.

Criteria	Description
Very High	The proposal intrudes into a large proportion or critical part of the available vista and is without question the most noticeable element. A high degree of visual disorder or disharmony is also generated, strongly reducing the visual amenity of the scene.
High	The proposal intrudes into a significant proportion or important part of the available vista and is one of the most noticeable elements. A considerable degree of visual disorder or disharmony is also likely to be generated, appreciably reducing the visual amenity of the scene.
Medium	The proposal represents a moderate intrusion into the available vista, is a readily noticeable element and/or it may generate a degree of visual disorder or disharmony, thereby reducing the visual amenity of the scene. Alternatively, it may represent a balance of higher and lower order estimates in relation to visual presence and visual amenity.
Low	The proposal intrudes to a minor extent into the available vista and may not be noticed by a casual observer and/or the proposal would not have a marked effect on the visual amenity of the scene.
Negligible	The proposal would be barely discernible within the available vista and/or it would not detract from, and may even enhance, the visual amenity of the scene.

Figure 13: Extract from Planning Application document: Environmental, Volume II - Main EIAR, Chapter 12 - Landscape and Visual.pdf; Magnitude of Visual Impacts

12.3.6.2 Sensitivity of Local Community views (LCV)

The assessment of visual sensitivity for local community views focuses on the perspectives of individuals who live, work, or travel within approximately 5km of the Proposed Development Site. These people are most likely to experience changes in their visual amenity due to the proximity of the turbines, their potential visibility from various directions, or the turbines becoming a familiar part of their daily views. The relevant viewpoints for this assessment within the Central Study Area include VP7, VP9, VP10, VP11, VP12, VP13, VP14, VP15, VP16, VP17, VP18 and VP20.

The Local Community views tend to be across a typical rural landscape and are often contained at relatively short distances by surrounding vegetation. Whilst they are valued at a local level by local residents, they are not rare or distinctive and are not highly valued in the context of the broader population in the manner that scenic designations in a county development plan are, for example. However, it is acknowledged that residents at home are susceptible to changes in their localised views even in productive rural areas already characterised by wind energy development. On balance of these value and susceptibility considerations Local Community receptors are generally considered to have **Medium-low** visual receptor sensitivity subject to specific amenity considerations at each VP location.

Figure 14: Extract from Planning Application document: Environmental, Volume II - Main EIAR, Chapter 12 - Landscape and Visual.pdf; Sensitivity of Local Community Views (LCV)

Again, the highlighted text below from this extract reinforces our points made earlier.

*Whilst they are valued at a local level by local residents, they are not rare or distinctive and are **not highly valued in the context of the broader population** in the manner that scenic designations in a county development plan are, for example. However, it is acknowledged that residents at home are susceptible to changes in their localised views even in productive rural areas already characterised by wind energy development. On balance of these value and susceptibility considerations **Local Community receptors are generally considered to have Medium-low visual receptor sensitivity subject to specific amenity considerations at each VP location.***

The relevant viewpoints for this assessment within the Central Study Area include VP7, VP9, VP10, VP11, VP12, VP13, VP14, VP15, VP16, VP17, VP18 and VP20.

Referring to Figure 15, It is difficult to see which VP would best represent the people most impacted in Figure 12. We don't see an entry in the table for the hundreds of family living rooms, kitchen's etc.

VRP No.	Location	Distance to the nearest turbine (km)	Representative of	Direction of View
VP1	R513 at Hospital	9.3	CP, MR	W
VP2	R515 southwest of Elton	7.9	MR	NW
VP3	L1511 at Kilfinane	12.6	CP	NNW
VP4	R512 at Ardpatrick	12.6	CP, MR	NNW
VP5	N20 at Charleville	12.4	CP, MR	NNE
VP6	N20 at Harding Grove	6.4	MR	E
VP7	R518 at Bruree	5.4	CP, MR, LC	NE
VP8	R512 at Kilmallock	5.3	CP, MR	N
VP9	L1550 at Trinity Holywell	2.1	AH, LC	N
VP10	Dromin Graveyard	1.7	AH, LC	N
VP11	Local Road at Dromin North	0.8	LC	N
VP12	Local Road at Rathcannon	1.7	LC	N, E
VP13	L1414 at Rathcannon	1.1	LC	NE, SE
VP14	L1414 at Camas South	0.70	LC	N, S
VP15	R512 at Tynacocca	0.9	LC	W, NW
VP16	R512 at Bruff	1.9	CP, MR, LC	W, SW
VP17	Grange Stone Circle	5.2	AH, SV, LC	SW
VP18	Lough Gur Wedge Tomb	5.9	AH, SV, LC	SW
VP19	Lough Gur	6.9	AH, SV	SW
VP20	L1412 at Cahirgillmore	2.7	LC	S
VP21	L1410 west of Monaster	6.6	SV	SE
VP22	Residential Road at Adare	15.0	AH, CP	SE

Figure 15: Extract from Planning Application document: Environmental, Volume II - Main EIAR, Chapter 12 - Landscape and Visual.pdf; Selected Viewpoints

On The Matter of National Territory Mapping for Renewable Electricity

Referring to *Planning Application document: Environmental* → *Volume II - Main EIAR* → [Chapter 12 - Landscape and Visual.pdf](#) [PDF]

While it is a separate topic in and of itself, the National Territory Mapping for Renewable Electricity has led the community of Bruff to this challenging and worrying situation to begin with. We would just like to make note of our concern at the highlighted text below in Figure 16. There is a real danger that the entire county of Limerick is going to be converted into one huge windfarm, causing massive impacts for rural communities all over the county. Something needs to change in terms of the vast swathe of land designated as 'Preferred' for county Limerick, as shown highlighted in green in Figure 17. I include for the record, in the Appendix, my response as part of the recent public consultation on the National Territory Mapping for Renewable Electricity.

12.5.10 Do-Nothing

From a landscape and visual perspective, there are many political, economic, social and environmental factors that may influence the baseline landscape and visual environment in the longer term.

In terms of wind energy development, the Site and wider landscape within the Agricultural Lowlands of County Limerick is considered to form part of an area, which is 'Preferred' for Wind Energy Development so it is likely that such development will continue to be brought forward in this general area to meet increasing demands for renewable energy.

In this instance, it is considered that the receiving landscape and visual baseline would remain in the same or similar condition as it is currently should the Proposed Development not proceed, albeit with pressure for similar scale and form of development likely to follow.

Figure 16: Extract from *Planning Application document: Environmental, Volume II - Main EIAR, Chapter 12 - Landscape and Visual.pdf*

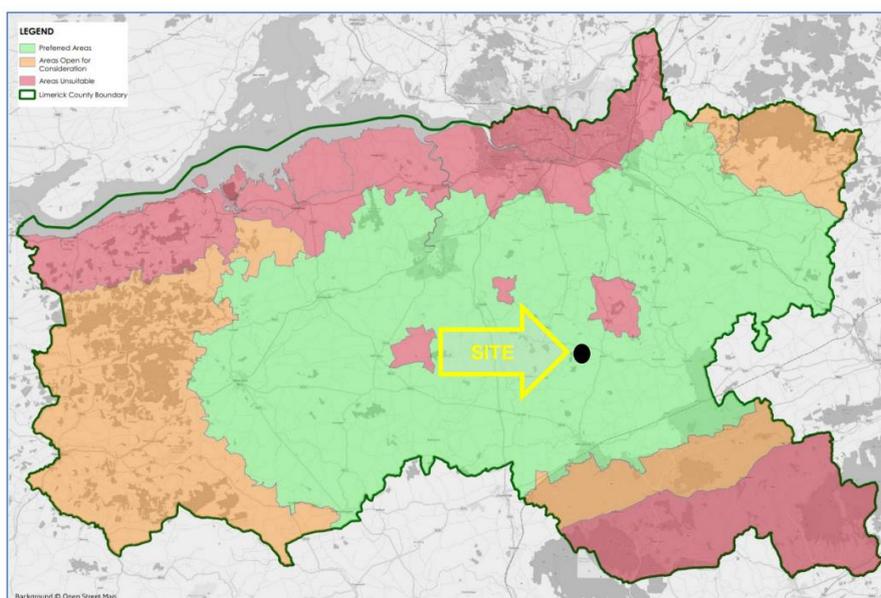


Figure 12-5: Excerpt from Limerick DP Wind Energy Strategy map

Figure 17: Extract from *Planning Application document: Environmental, Volume II - Main EIAR, Chapter 12 - Landscape and Visual.pdf; Wind Energy Strategy*

On The Matter of Public Consultation

1.4.3 Consultation

Extensive consultation was undertaken in relation to the proposed development, and comments from stakeholders and interested parties were requested and highly encouraged.

Consultation through door to door engagement, 1 to 1 meetings on request, community clinics, letters, email and telephone calls, with various statutory and non-statutory consultees has been maintained throughout.

Figure 18: Extract from Planning Application document: Environmental, Volume II - Main EIAR, Chapter 01 – Introduction.pdf; Consultation

We would like to note that we doubt the credibility of these statements. Some very mediocre attempt may have been made, but we can confirm that we received no communication from the applicant in relation this proposed massive development, even though we reside within one of their proximity zones. As far as we are aware, the applicant refused to meet with the community when invited to a public meeting. So, given the potentially enormous impact the applicant's development could have on our families lives, and on our beautiful community, we would appreciate if the PR gas-lighting was dialled down a little in the associated documentation. Thanks.

In Conclusion

We have outlined some of our concerns in the pages hitherto, although this is not an exhaustive list, and we expect other community members will contribute to paint a complete picture as to why this development will be extremely detrimental to the town of Bruff and the surrounding area's.

The development is wholly unsuitable for the area. Just as a simple example, refer to the images in Figure 19 and Figure 20, which show the condition of the land very close to the proposed location of some of these turbines just this past week following inclement weather.



Figure 19: Land Conditions Close to Proposed Development Site on the Week of 15th November 2025 – Image #1



Figure 20: Land Conditions Close to Proposed Development Site on the Week of 15th November 2025 – Image #2

Based on all the above, we strongly urge that this development be rejected outright.

Thank you for considering this submission.

Kind Regards,

Michael O'Hara, *Edell O'Hara*

Phone (optional)

Appendix I

PUBLIC CONSULTATION ON NATIONAL TERRITORY MAPPING FOR RENEWABLE ELECTRICITY

- 1. What are your views on the State's adopted approach to the "national territory mapping" by using existing plans, to identify the domestic potential and the available areas necessary for the installation of renewable energy projects?**

First of all, the document titled '*Renewable Energy Directive 2023/2413 Public Consultation on National Territory Mapping for Renewable Electricity September 2025*' states the following:

The Government's Accelerating Renewable Electricity Taskforce (ARET), was established with the core aim of accelerating the delivery of renewable generation and electricity infrastructure, required to underpin national decarbonisation objectives.

Notwithstanding this consultation process, the rush to implement what are incredibly significant and impactful (negative connotation) changes to the Irish landscape could have incredibly detrimental consequences into the future for communities, families and citizens of this country. If the mapping of certain parts of the country for Grid-Scale Onshore Wind, shown in the document

[*Map_1_-_National_Territory_Mapping_for_Grid-Scale_Onshore_Wind.pdf*](#)

is an indication of leveraging the existing plans with input from local planning authorities as described here...

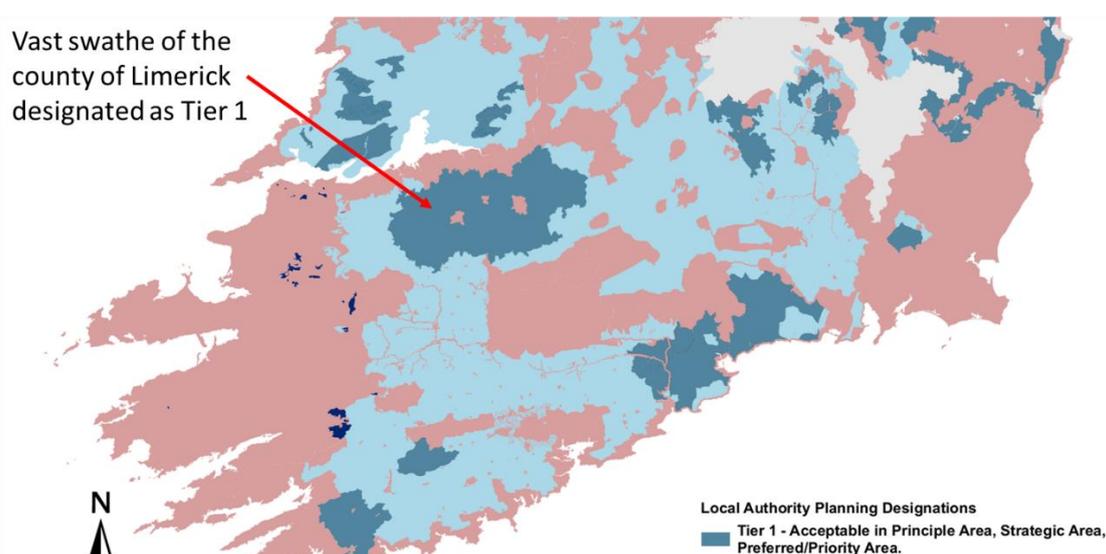
Using the mapping received from local Planning Authorities, collated maps for onshore wind and solar PV have been created, showing all current local Planning Authority designations in a single map that amalgamates and harmonises all the various local Planning Authority designations

then the process is flawed in the extreme when the county I live in is considered in terms of this mapping for Onshore Wind harvesting.

2. Have you any feedback on Map 1: National Territory Mapping for Grid-Scale Onshore Wind in Ireland?

Yes.

The manner in which the County of Limerick is designated in terms of the various Tiers is a serious concern and one which we already see the impact of in our community. I will state at the outset here that I strongly object to this mapping of the county as significantly Tier 1 and I must ask the question as to how this could be allowed to happen. It is one thing stating that there are locations where there are favourable wind conditions within the county but the consequences of making that observation for the purpose of this mapping exercise are far reaching and will be devastating for communities throughout the county. If this was down to the local authorities, then it is shameful that they would pave the way for what we already see immediately in front of us in my community.



I live just outside a small rural town in Limerick where we are in a battle with a development company who wants to build an industrial scale windfarm immediately adjacent to the town. How can this be allowed to happen. It is in the planning permission phase, but I will rephrase my question, '*How can this be allowed to even get this far?*'. The answer appears to right there in your mapping, for which you are requesting public feedback as part of a consultation process. But how can that be? How can our community be in this battle where an industrial size windfarm development is proposed immediately adjacent to a densely populated area because of the designation for which you are seeking public consultation? It seems that the cart has been placed before the horse, no? And it is not just our community here. Several neighbouring villages are in the same battle. This is shocking to say the least and it appears it is only the tip of what will be a catastrophic iceberg if this mapping proposal gets the green light.

For our community, if this development gets permission, millions of Euro's will immediately be wiped from the area as families see the value of their homes decimated. It will have repercussions for future development, the growth of the town, future population growth, future sustainability of sporting clubs and on and on.....

This should not happen in places like our town and rural areas throughout the country!!

3. Have you any feedback on Map 2: National Territory Mapping for Grid-Scale Solar PV in Ireland?

No

4. Have you any views on the inclusion of Map 3: Available Areas of Offshore Renewable Energy in Ireland, in the State's mapping of available areas for the purposes of Article 15b compliance?

There should be more emphasis on Offshore. I understand there are greater technical challenges with Offshore but that should be a higher propriety and area of focus than Onshore. *I suspect there is an element of pandering to the companies behind the wind farm developments to make it easier for Onshore development where the costs are cheaper and opportunities for profits higher??*

5. Have you any additional feedback on this Public Consultation?

Please do not sell out small rural communities around the country like our own and leave us at the mercy of these well financed companies, the planning authorities and the prohibitively expensive legal system.

Thank you!

Mick