

Olivia Nestor
Carrigeen
Bruff
Co Limerick

14 November 2025

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

Case Reference: PAX91.323780

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 existing 220/110kV Killonan 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,

I, Olivia Nestor, Carrigeen, Bruff, Co. Limerick, hereby lodge a formal objection to the proposed wind farm development referenced above.

Five of the seventeen turbines are within 1.6km from my home.

- T1 – 843.6m
- T5 – 1072.2m
- T4 – 1080.0m
- T2 – 1251.9m
- T3 – 1563.3m

I purchased my home ten years ago and chose to remain in the countryside for its landscape, peace and tranquillity. Knowing that I could now be surrounded by seventeen giant turbines is extremely concerning. I reside on the R516, close to the turbine delivery site entrance, therefore I will be severely impacted. The R516 is not suitable for large construction traffic and is already a concern for cyclists and walkers. The predicted frequency and duration of HGV traffic on these rural roads pose safety risks and will generate significant noise and disturbance. I work remotely a few days each week. Remote working is now a recognised mode of employment, a return to the office full-time would increase the carbon emissions of commuting for all who find themselves in a similar situation. How significant is the impact of this development on Wi-Fi signals?

As the site entrance is approximately 75m from my home, the following need to be addressed - what measures are in place to prevent queuing of construction traffic on the adjoining road network, what are the details relating to on-site car parking facilities for site workers during construction, what measures are in place to control noise during construction, in particular noise associated with the transportation of wind turbine components at night?

Scale and Visual Impact, Residential Amenity

The proposed project of a 17-turbine wind farm, sixteen turbines reaching heights of 160 metres (40m higher than Dublin's Spire) and rotor diameter of 136m, would constitute an industrial-scale intrusion within a predominantly rural and scenic landscape. The cumulative visual impact, when assessed alongside other proposed turbines in County Limerick, would materially and adversely affect the landscape character and amenity of the area. The site lies within a landscape of significant aesthetic and historic value potentially having adverse consequences for the Lough Gur area.

This visual intrusion conflicts with the Limerick Development Plan 2022-2028, which commits to preserving the rural and scenic amenity of the county and supports wind energy only where it does not have a negative impact on the surrounding environment landscape, biodiversity, water quality or local amenities.

Ref – Landscape and Visual Amenity – Policy EH P8 - Landscape Character Areas. It is a policy of the Council to promote the distinctiveness and where necessary safeguard the sensitivity of Limerick's landscape types, through the landscape characterisation process in accordance with the Draft Guidelines for Landscape and Landscape Assessment (2000) as issued by the Department of Environment and Local Government, in accordance with the European Landscape Convention (Florence Convention) and with A National Landscape Strategy for Ireland – 2015- 2025. The Council shall implement any relevant recommendations contained in the Department of Arts, Heritage and the Gaeltacht's National Landscape Strategy for Ireland, 2015 – 2025.

Large turbine developments are premature, pending national policy and regulations. Cumulative impact has not been assessed. Potential driver distraction is an added concern due to the volume, height and proximity of the turbines.

Health Concerns

The proximity of turbines to residential dwellings gives rise to legitimate concerns regarding noise pollution, dust/vibration, sleep deprivation, shadow flicker, low-frequency sound, headaches, vertigo and general loss of community wellbeing. International precedent and the principles of good planning dictate that such large structures should be sited at a greater setback distance to safeguard public health and quality of life. The developer's noise and shadow flicker studies are incomplete and underestimate the impact on nearby residents. Chronic exposure can result in fatigue, stress, hypertension and a decline in psychological well-being. The possibility of five turbines within approximately 1.6km from my home is a grave concern.

Ref – Draft Revised Wind Energy Development Guidelines December 2019

The WHO Environmental Noise Guidelines for the European Region (2018) provide guidance on protecting human health from harmful exposure to environmental noise. Compared to previous WHO guidelines on noise, there are five significant developments in the 2018 version which include, stronger evidence of cardiovascular and metabolic effects of environmental noise and inclusion of new noise sources, namely wind turbine noise and leisure noise, in addition to noise from transportation (aircraft, rail and road traffic).

The EIAR (Chapter 12 – Noise and Vibration) concludes no significant health effects but provides limited receptor-specific analysis for homes within 2km and does not assess low-frequency noise or amplitude modulation. This conflicts with the WHO Environmental Noise Guidelines (2018) which link

turbine noise to sleep disturbance and reduced quality of life. Independent baseline and post-construction monitoring, curtailment protocols and accessible community reporting are required.

Noise sensitive location - Full disclosure of wind turbine noise levels at my property for the duration of the wind energy development is required. The WHO Environmental Noise Guidelines for the European Region (2018) recommend limiting noise from wind turbines to below 45 dB. The Health Service Executive (HSE) should be fully consulted on this development proposal to assess public health risks before any decision is made.

Shadow Flicker – Evidence that shadow flicker control mechanisms will be in place for the operational duration of the wind energy development project is required. Thresholds according to the Irish Wind Energy Development Guidelines (2006) are 30 hours of shadow flicker per year and a daily limit of 30 minutes per day at nearby homes, mine is estimated at 37.1 hours per year. Mitigation measures are required to ensure compliance. Confirmation of turbine-to-turbine separation distances are required.

Vulnerable Groups (Autism, Sensory Sensitivity, Down Syndrome etc)

The EIAR (Chapter 7 – Population & Human Health) provides no assessment of impacts on neurodivergent individuals or those with sensory sensitivities, who may be particularly affected by noise, low-frequency vibration and shadow flicker. This omission is inconsistent with the EIA Directive's requirement to assess human health comprehensively and the Equal Status Acts 2000-2018 regarding disproportionate impacts on people with disabilities. The added burden of environmental noise can cause further disadvantages and social exclusion for an already vulnerable community. A specific assessment on the effects of neurodivergent and other vulnerable residents is required.

Wildlife & Biodiversity

This proposed development which spans multiple townlands, poses significant risks to local hydrology, protected habitats including protected species, in particular whooper swans and bats (particularly migration routes and collision risk). The EIAR (Chapter 9 – Biodiversity) relies on incomplete data, short surveys were only conducted. Whooper swans are visible in flooded fields near my home in Carrigeen, Bruff (approx. 400m) regularly, again in recent days. The proposal fails to meet strict requirements of the Habitats and Birds Directives. Frameworks such as the Habitats and Birds Directives, the UN Convention on Biological Diversity and the EU Biodiversity Strategy for 2030 require that renewable energy expansion must not come at the expense of biodiversity. The potential loss or displacement of wildlife would permanently damage the ecological balance of the Bruff area.

Property Devaluation

Properties adjacent to the seventeen wind turbines and substation will be seriously devalued. University of Galway published a document showing properties within 1km of a turbine were devalued by approximately 14.7% with greater impact from taller turbines and a higher density of turbines. This will have huge implications for homeowners.

Community Engagement and Public Participation

Residents who are directly affected by this development did not receive adequate, detailed information. 'Sorry we missed you' leaflet drops during working hours is not appropriate for such a large-scale turbine development and felt like a tick the box exercise. Public engagement involves open, transparent interactions between citizens and organisations to share knowledge, build

relationships and involve the public in environmental decision-making processes. (Aarhus Convention). This obligation has not been fulfilled to a satisfactory standard. Public meetings with the developer should have been held, providing equal opportunities for everyone to contribute and access information, instead of an invitation for individual clinics where residents felt intimidated to attend.

Application Form for Permission / Approval in respect of a Strategic Infrastructure Development - Landowner Consent

Regarding the signature relating to the registered owner of the property comprised in Folio 51699F County Limerick and Folio 1539F County Limerick ("my property") – unable to find supporting documentation, has this been validated?

Borrow Pit/Gas Pipeline /Flooding and Land Disturbance

Borrow Pit (No. 1) located at the northern end of the wind farm site appears to be approximately 300m from my home and I have huge concerns in relation to dust and air quality, noise and vibration. What dust suppression methods are in place? There are insufficient details in the developer's documentation to correctly identify how close my home is to the borrow pit (No. 1). The data across Drawings versus Chapter 13 is contradictory, therefore they have failed to assess the true impact on my property. The intense noise from excavation would be highly disruptive and mentally draining.

Concerns also regarding the nearby gas pipeline – risk of excavation damage, vibration damage, risk to public safety and the environment.

This area continually experiences issues with water retention and surface flooding after heavy rainfall. The excavation could potentially cause soil erosion, water contamination and habitat destruction. There is an increased risk of flooding for nearby homes. My back garden can get waterlogged after excessive rain, and I fear any extensive groundwork nearby would disturb natural drainage patterns and compact the soil, worsening the situation.

Ref – Limerick Development Plan 2022-2028 Volume 4 Strategic Flood Risk Assessment

5.4.2 Highly vulnerable development in Flood Zone A or B Development which is highly vulnerable to flooding, as defined in The Planning System and Flood Risk Management Guidelines, includes (but is not limited to) dwelling houses, hospitals, emergency services and caravan parks.

5.4.2.1 New development It is not appropriate for new, highly vulnerable, development to be located in Flood Zones A or B outside the core of a settlement. Such proposals do not pass the Justification Test for Development Plans. Instead, a less vulnerable or water compatible use should be considered. In some cases, land use objectives which include for highly vulnerable uses have been justified in the Development Plan. This includes zonings focused around an urban core which allow for a mix of residential, commercial and other uses. In such cases, a sequential approach to land use within the site must be taken and will consider the presence or absence of defences, land raising and provision of compensatory storage, safe access and egress in a flood and the impact on the wider development area.

Floods - Camas North, Bruff – November 2025 (photos below) – approx. 400m from my property.





In conclusion, this proposed development has significant potential for destruction of ecology, habitat and species and an adverse impact on biodiversity. The height of the turbines is colossal and would dominate the skyline. They would be visually overbearing for existing properties and would destroy the beauty associated with this Golden Vale area of County Limerick. Proximity to houses, excessive noise pollution, shadow flickering as well as property devaluation requires thorough evaluation. Renewable energy must be developed responsibly. Public health and community well-being should remain central to any decision made.

Considering the above, I respectfully request that An Coimisiún Pleanála refuse permission for the proposed development. Should the Board nonetheless consider approval, I request that stringent conditions be imposed, including substantial reduction in turbine numbers in the area, increased setback distances from dwellings, independent noise and shadow flicker monitoring, and comprehensive environmental protection measures.

Kind Regards,

Olivia Nestor

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