

Roisin Keating

Carrigeen

Bruff

Co.Limerick

V35 V659

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 and ancillary development. Located in Ballincurra, Ballingayrou, Ballinlee North & South, Ballinrea, Ballyreesode, Camas North & South, Carrigeen, Knockuregare, Ballybane and other townlands in County Limerick.

Dear Sir/Madam, I respectfully object to the proposed wind farm.

I live approximately 700 metres from the nearest proposed turbine. I live on the road the R516 where the delivery turbine is proposed to take place.

Personal Note:

My love of nature feels like it is under attack. How can this be called progress when it destroys the very peace and balance that give life meaning? I have grown up surrounded by the quiet rhythm of this land, the fields that breathe with the seasons, the hedgerows full of birdsong, the still mornings when the mist hangs over the hills. The whooper swans return each winter, gliding across the flooded fields, and every time I see them, I am reminded that there is still beauty and order in the world.

If we lose our connection to nature, we lose something sacred. an invisible thread that ties us to one another and to the earth itself. The land teaches us stillness, patience, and humility; it gives us a sense of belonging that no machine or industry could ever replace. These turbines would not just change the view, they would break that quiet bond, that sense of home that lives inside all of us who have loved this place our whole lives.

This landscape has been a source of healing for me, a place where I've learned to breathe again on difficult days, where the light through the trees can soften even the hardest thoughts. To see it torn open and built over feels like losing a part of myself. I believe protecting it is not only an environmental duty but an act of love; for the land, for the people, and for the generations yet to come.

I respectfully object to the proposed development for the reasons below. My concerns relate to human health and residential amenity (including sleep disturbance), landscape and visual impact on the Golden Vale and heritage settings (including Lough Gur), traffic and road safety on sub-standard rural roads, wildlife impacts (Whooper Swans, bats and other protected species), hydrology/flood risk, **and** deficiencies in public participation and the EIAR. **Taken together,**

the application fails to meet EU and Irish legal standards for **environmental assessment and should be refused.**

1) Legal Framework (EU & Irish)

- **EIA Directive 2011/92/EU as amended by 2014/52/EU** – requires a *complete, accurate and adequate* assessment of all likely significant effects on the environment, including **human health**, and a **genuine public participation** process (Annex IV).
- **Aarhus Convention** (access to information, public participation, access to justice) – Ireland is a Party; public participation must be **early, effective and transparent** (Arts. 6–7).
- **Birds Directive 2009/147/EC & Habitats Directive 92/43/EEC** – strict protection for **Annex I birds (e.g., Whooper Swan) and Annex IV species (all bat species)**; appropriate assessment rules apply where relevant.
- **Water Framework Directive 2000/60/EC** – prohibits deterioration of water body status; requires protection of groundwater and drinking water resources.
- **Floods Directive 2007/60/EC and The Planning System and Flood Risk Management Guidelines (OPW/DoEHLG 2009)** – require robust flood risk assessment and the **Justification Test** where applicable.
- **Planning and Development Act 2000–2024 & Regulations 2001–2024** – implement EIA and set decision-making duties for the Board.
- **Wind Energy Development Guidelines 2006 (and Draft 2019 Update)** – set expectations on **noise, shadow flicker and visual assessment quality**.
- **WHO Environmental Noise Guidelines (2018)** – acknowledge health impacts from environmental noise (including **sleep disturbance**).

Case law (illustrative):

- **O’Grianna v An Bord Pleanála [2014] IEHC 632** – grid connection works integral to a wind farm must be assessed **together**, not split off (project-splitting is unlawful).

- **ECJ C-215/06 (Derrybrien)** – failure to carry out a complete, adequate EIA for a wind farm and associated impacts (peat slide) breaches EU law.
- **People Over Wind v Coillte C-323/17** – mitigation cannot be assumed at screening; robust assessment is required (relevant to ecology).

2) Human Health & Residential Amenity (Noise, Sleep, Shadow Flicker)

I already have trouble **sleeping**. The EIAR's **Population & Human Health and Noise** assessments are **not receptor-specific** and do not credibly assess **sleep disturbance** at my dwelling or the nearest sensitive properties. The WHO (2018) identifies chronic environmental noise as a driver of **sleep disruption, annoyance and adverse health outcomes**. The EIAR relies on generic contours and assumptions, rather than worst-case **night-time** conditions, cumulative effects, or individual sensitivities.

- **Deficiencies:** lack of **house-specific predictions**, insufficient assessment of **low-frequency noise, amplitude modulation, tonality, and combined noise + shadow flicker** at bedroom façades; no credible mitigation commitments enforceable as **conditions with compliance monitoring**.
- **Law/Policy:** EIA Directive (human health), WHO 2018 guidelines, Wind Energy Guidelines.

Outcome sought: refusal; alternatively, the Board cannot rely on these conclusions without a receptor-specific assessment demonstrating compliance at my home **before** consent.

3) Landscape & Visual – Golden Vale and Heritage Settings (incl. Lough Gur)

The **Golden Vale** is a high-value pastoral landscape. The EIAR's LVIA **understates** effects by:

- Relying on **leaf-on** images and **low camera positions**,
- Omitting **leaf-off (winter)** and **night/aviation lighting** photomontages,

- Inadequate **sequential views** along key roads (**R512, R516 and L-roads**) that residents and visitors actually experience,
- Limited garden-level receptor views from dwellings.

Heritage setting: The turbines would adversely affect the wider setting of **Lough Gur** and local archaeology (ringforts/fairy forts), contrary to the intent of the **National Monuments Acts 1930–2014** and **County Development Plan** policies on protecting heritage landscapes and their settings. The EIAR acknowledges potential for **previously unrecorded archaeology** but provides **no credible survey/monitoring framework** proportionate to deep excavations, haul routes and cable trenching.

Law/Policy: EIA Directive (landscape, cultural heritage), National Monuments Acts, Limerick CDP policies on heritage/landscape protection, GLVIA/Wind Energy Guidelines.

Outcome: significant adverse landscape/heritage effects are **under-represented**; conclusions are unreliable. Permission should be **refused**.

4) Traffic, Road Safety & Emergency Access

My local roads are **narrow, winding and lightly constructed** (R516, R512 and L-roads serving Bruff, Dromin, Athlacca, Ballinlee and Camas). The EIAR's traffic chapter and construction logistics **do not** credibly assess:

- **Peak-hour conflicts** (school runs, GAA fixtures, farm machinery),
- **Blockage risk** from abnormal-load turbine deliveries (blades, towers, cranes) where **no passing bays** exist,
- **Emergency access:** the impact on **ambulance and fire brigade** response times and the absence of a coordinated plan with **Limerick Fire & Rescue/HSE Ambulance**.
- **Cable trenching** for the 110 kV route causing rolling **closures/diversions** and cumulative disruption.

Law/Policy: EIA Directive (human safety), TII/DMURS principles, Road Safety Audit best practice.

Outcome: without a credible **Construction Traffic Management Plan** addressing emergency access and sequential closures, the proposal poses **unacceptable safety risks**.

5) Wildlife – Whooper Swans, Bats & Other Protected Species

Whooper Swan is an **Annex I** species (Birds Directive) known to use flooded fields in this area; **bats** are **Annex IV** strictly protected (Habitats Directive). The EIAR **omits or downplays**:

- **Wintering bird surveys** at times when Whooper Swans are present in flooded fields,
- Collision risk modelling specific to **flightlines and roost/feeding areas**,
- **Bat activity surveys** at appropriate seasons/heights, curtailment triggers (e.g., wind-speed/temperature) and turbine siting relative to hedgerows/commuting routes.

Law/Policy: Birds & Habitats Directives (strict protection), Article 12 Habitats (prohibition on deliberate killing/disturbance of bats), requirement for **appropriate assessment** where pathways exist.

Outcome: the ecological baseline and mitigation are **insufficiently evidenced**; permission should be **refused** (or, at minimum, cannot be granted without a legally robust AA and species-protection measures enforceable by condition).

6) Hydrology, Flood Risk & Private Wells

Local **floodplains interact**, and fields **regularly flood into one another**. Extensive excavation (turbine foundations, hardstands, tracks) and **27.6 km of cable trenching** can **alter runoff and groundwater pathways**, affecting both **flood risk** and **private wells**.

- **Deficiencies:**
 - No **comprehensive well mapping**, baseline water-quality testing, or contingency for **supply interruption**;
 - Limited **cumulative flood modelling** for construction + operational drainage, including the cable route;

- No demonstration of compliance with **WFD “no deterioration”** for connected water bodies.
- **Law/Policy:** WFD 2000/60/EC; Floods Directive; OPW/DoEHLG Flood Guidelines (Justification Test where relevant); EPA EIA Guidelines (2017).

Outcome: the hydrology/flood and groundwater assessment is **inadequate**; permission should be refused.

7) Public Participation & Consultation (Aarhus)

I was **not directly consulted** in a timely or meaningful way. Communications were **not straightforward**, and key technical information (e.g., complete, balanced visuals; clear traffic staging; ecology detail) was **difficult to access or interpret**. Under **Aarhus** and the **EIA Directive**, participation must be **early, effective, and informed**. Where the EIAR is incomplete or presented in a way that **hinders understanding**, effective participation is denied.

Outcome: this procedural deficiency weighs against granting consent.

8) Cumulative Effects & Project Integration (incl. Grid)

The project's viability depends on a **grid connection**; per **O’Grianna**, grid works are **integral** and must be assessed **together**. The EIAR and Appendix materials do not provide a **clear, integrated assessment** of the grid route's impacts (traffic, ecology, archaeology, wells, flood risk) **alongside** turbine works. Cumulative effects with other regional infrastructure are also **under-assessed**.

Outcome: the project is not lawfully or transparently assessed as a **single whole**, contrary to EIA law.

9) Community Cohesion

The proposal is already causing **community division** and stress. The **human environment** includes social cohesion and rural quality of life. The EIAR treats “Population & Human Health” narrowly as **exposure metrics**, overlooking **psychological wellbeing, amenity, tranquillity**, and the cumulative burden on a small rural community asked to absorb an industrial-scale development.

Additional Concerns Based on the EIAR

Upon review of the EIAR, I note further significant shortcomings in its assessment of biodiversity, hydrology, heritage, and long-term impacts. The baseline ecological surveys for protected species, particularly bats (Appendix 6E) and mammals (Appendix 6D), appear insufficiently detailed and not adequately spatially focused on local hedgerows and flight corridors. Without richer, seasonal data, mitigation may be misguided or inadequate. Furthermore, while a Surface Water Management Plan (SWMP) is included (Appendix 4B), there is no guarantee of robust, site-specific flood modelling around turbine foundations, cable trenches, or access roads — this is particularly concerning in already flood-prone areas. The proposed grid connection route and cable trenches (Appendix 4A) risk fragmenting wildlife habitats and causing visual as well as hydrological disturbance, yet no photomontages for the construction phase are provided. The Cultural Heritage chapter (EIAR Chapter 14) identifies recorded monuments in the study area but fails to grapple meaningfully with the visual setting and impact on multiple protected archaeological sites and historic structures. Mitigation measures, while mentioned, lack commitment to long-term, independent monitoring: there should be legally binding obligations to monitor ecological, noise, and water impacts post-construction, including bat mortality, hydrological restoration, and community noise. Additionally, the EIAR presents noise and shadow flicker modelling (Chapters 13 & 15), but does not sufficiently address the risk of **cumulative impacts** from other proposed wind farms in the region. Finally, although stakeholder consultation reports are provided, the technical nature of the EIAR documents and public engagement materials may limit genuine understanding by residents, raising concerns under the principles of the Aarhus Convention.

Lack of Independent Verification

Many technical reports (noise, ecology, shadow flicker, traffic) were produced by consultants hired directly by the developer.

No independent peer review or validation is provided.

This undermines confidence in the objectivity of the findings, particularly where predicted impacts appear minimised.

Noise and Human Health- First hand experience

I recently stayed in Cobh, Co Cork in an apartment that was just a two-minute walk from Kennedy Pier. I came here seeking a peaceful night away time to rest, reflect, and recharge by the water yet all I could hear, in the stillness of this coastal town, was the relentless hum of the nearby wind turbines at the Port of Cork.

Even from approximately 3 kilometres away, the sound is inescapable. It is not sharp or intermittent; it is a low, continuous drone, like a vibration that hums through the air and into the body itself. Inside the room, with the windows closed, I can still hear it. It sits behind every sound, pressing on the chest, filling the ears. And when night falls, when Cobh finally quiets, the hum remains the only sound left in the dark. It feels mechanical, alien, and deeply unsettling. Locals described the sound as “like motorbikes in the distance,” rising and falling but never truly stopping.

This was not subtle background noise; it was constant and disorienting. I felt light-headed, nauseous, and found it difficult to rest. Having now experienced firsthand the reality of turbine noise, I am deeply concerned about the effect of turbines on residents living just 700 metres from the proposed Ballinlee Wind Farm. If turbines several kilometres away can cause this level of disturbance, the impact on my community would be far worse.

Independent environmental documentation supports these concerns. The Ringaskiddy Environmental Impact Assessment Report (Noise & Vibration, 2025) identifies “wind turbine and industrial plant noise” as primary contributors to baseline noise in the Cork Harbour area. The Port of Cork Ringaskiddy EIAR recorded 47 noise complaints in 2023, showing a clear

pattern of disturbance. The WHO Environmental Noise Guidelines (2018) link chronic noise exposure, even below 40 dB(A), to sleep disturbance, cardiovascular stress, and reduced wellbeing. Irish courts have also acknowledged turbine noise as a nuisance, imposing operational limits in cases such as *O'Donnell v Clare County Council* (2017).

Despite these precedents, the Ballinlee EIAR (Chapter 5: Population and Human Health) treats noise as a mere technical statistic. It fails to acknowledge the lived human experience of low-frequency vibration — how it travels, how it disturbs sleep, and how it impacts both physical and emotional health. No receptor-specific assessment or proper modelling for night-time low-frequency noise is provided.

Under Directive 2014/52/EU and the Planning and Development Acts 2000–2024, “human health” encompasses physical, mental, and social wellbeing. By failing to assess psychological impacts or long-term community exposure, the EIAR is non-compliant with EU law and incomplete in its evaluation.

As someone who values silence and the restorative qualities of rural life, this experience has made it clear that the proposed development would threaten the peace and mental wellbeing of the community. The countryside’s silence is not emptiness; it is healing, safety, and belonging. To replace it with the drone of machines is to remove part of what makes life here human. This development is incompatible with the right to peaceful enjoyment of one’s home under Article 8 of the European Convention on Human Rights and contravenes the Aarhus Convention, which protects our right to a healthy environment and meaningful participation in environmental decision-making.

Psychological and Emotional Impact of the Process

In addition to the physical and environmental concerns outlined elsewhere in this submission, I wish to highlight the psychological and emotional toll this process has taken both personally and within our wider community.

The ongoing effort to understand and respond to the Ballinlee Wind Farm proposal has had a sustained impact on my mental health and wellbeing. For months, I have spent evenings reading technical planning documents, EIAR chapters, legal frameworks, and maps that are difficult for any ordinary person to interpret. I am the secretary on the Bruff, Dromin, Athlacca, Ballinlee Action group to stop this wind farm.

This is not simply an intellectual exercise; it is a form of psychological labour that has left many of us anxious, drained, and uncertain about the future of our home environment.

My sleep has been affected, I experience constant worry about what will happen to our community, and I often feel emotionally overwhelmed by the scale of what we are being asked to fight.

There is a recognised body of research that supports this experience. The University of Bath (2021) identified that people engaged in local environmental defence campaigns frequently experience “moral stress” a deep sense of fatigue and responsibility when trying to protect their community against industrial development.

Similarly, the concept of “solastalgia,” developed by philosopher Glenn Albrecht, describes the distress people feel when their home landscape the place that grounds them faces change or destruction. This perfectly describes the experience of many in our area.

The Trinity College Dublin (2019) study on community division caused by local developments also highlights that social conflict, uncertainty, and a lack of clear communication from developers can create serious mental strain.

I believe the EIAR fails entirely to acknowledge or assess these human impacts, despite the EU Directive 2014/52/EU, which requires consideration of population and human health in both physical and psychological terms.

For me, this process has not only challenged my wellbeing but has made me feel disconnected from the peace and calm my environment once gave me.

It is ironic that a development marketed as “sustainable” has created such emotional unsustainability within those who live closest to it.

Cumulative Visual Impact on Lough Gur

The proposed Ballinlee Wind Farm, in combination with the nearby Garrane Wind Farm and existing developments near Bruff, will have a significant cumulative visual impact on the landscapes surrounding Lough Gur. The turbines from both sites will be visible across the lake and its approaches, altering the character of this cherished environment. These developments will dominate the skyline, intrude upon long, open views, and diminish the sense of peace, heritage, and natural beauty that define Lough Gur.

Residents and visitors will not experience these turbines in isolation; the combined effect of multiple large-scale developments will intensify visual intrusion, disrupt recreational enjoyment, and further erode the quiet, rural character of the area. The EIAR fails to adequately assess these cumulative landscape and visual effects, leaving a serious gap in the planning assessment.

Why the Rush , And at What Cost?

It is difficult to ignore the sudden and urgent push to approve multiple wind farm developments across County Limerick including Ballinlee, Garrane, Bruree, and others in what feels less like thoughtful planning and more like a race to satisfy national and EU renewable energy targets. Recent local reporting has highlighted that several new wind farms are already proposed or progressing through planning, with more than thirty additional turbines potentially entering the Limerick landscape in the near future.

Projects such as Garrane (near Bruree), Coolcappa/Ballynisky, and others are being advanced at the same time, and data published on existing infrastructure shows that County Limerick already hosts a significant number of operational wind farms.

While renewable energy development is necessary, it must be balanced with the protection of rural communities, heritage landscapes, and local ecology. The pace and scale of current proposals give rise to legitimate concerns: are we at risk of sacrificing the unique identity of places like Lough Gur, the Golden Vale, and our surrounding townlands simply to meet numerical climate targets?

Progress should never come at the cost of the character, wellbeing, and environmental integrity of the very communities expected to host these industrial-scale developments

I want to finish by speaking simply as a person who is exhausted, frightened, and overwhelmed by what this proposal has already done to me. I never thought something like this could take over my life the way it has, but it has — quietly and steadily — and I feel it every single day.

For months now, my home hasn't felt like a place of comfort. Instead of waking up peacefully, I wake up with a knot in my stomach, wondering what the future of this place will look like. The thought of these enormous turbines rising over the fields around me, dominating every view, every horizon, every sky I look at it has filled me with a kind of fear I didn't expect. It is the fear of losing something that cannot ever be replaced.

This landscape is where I breathe. It is where I clear my head, where I find calm, where I feel connected to something steady and grounding. I didn't realise how much I depended on that until it felt like it was being taken away. The idea that the quiet, open countryside I rely on could be transformed into something industrial, loud, and visually overwhelming has left me shaken in a way I can't describe without feeling emotional.

People talk about planning and development like it's just paperwork, just infrastructure, just policy. But for me, it's my life. It's my home. It's the quiet that helps me cope. It's the landscape that gives me comfort when everything else feels heavy. And the thought of losing that the thought of waking up every day to towers and blades and flashing lights instead of the calm countryside I love is honestly heartbreaking.

Flooding and Drainage Concerns

There is **serious and regular flooding** near the lands where the development is proposed. Water often covers the road and spreads across nearby fields after heavy rainfall. This shows that the area is already vulnerable to flooding and that the ground and drainage system cannot handle additional water flow.

Building large turbine foundations, service roads, and cable trenches here could make flooding worse by blocking natural drainage and pushing water towards nearby homes, farms, and public roads. It could also make the area unsafe for construction or maintenance vehicles, especially during winter storms when floods are common.

Flooding can also carry **polluted runoff**, such as soil, concrete, or oil from machinery, into local rivers and streams. This could harm water quality, wildlife habitats, and the wider ecosystem.

Under **Irish and EU law**, this issue must be taken very seriously.

- The **Planning System and Flood Risk Management Guidelines for Planning Authorities (Department of Environment, Heritage and Local Government, 2009)** make it clear that developments should be **avoided in areas that flood**.
- These guidelines require a **Site-Specific Flood Risk Assessment (FRA)** whenever development is proposed in or near known flood zones.
- The **Sequential Approach** must be used, meaning that flood-prone lands should be the **last resort** for development.

The proposal also appears to conflict with:

- The **EU Floods Directive (2007/60/EC)**, which requires countries to assess and reduce flood risks, not add to them.
- The **European Communities (Assessment and Management of Flood Risks) Regulations 2010 (S.I. No. 122 of 2010)**, which give this EU directive force in Irish law.
- The **Limerick County Development Plan 2022–2028**, which says that development on or near flood-prone land must prove—through hydrological studies—that it will **not increase flood risk** anywhere on-site or downstream.

At present, the **Environmental Impact Assessment Report (EIAR)** for this proposal does not show any detailed hydrological or flood risk study for the affected area. This is a serious omission.

Under the **EPA Guidelines for Environmental Impact Assessment Reports (2022)** and **S.I.**

No. 296 of 2018 (EIA Regulations), all developments must include evidence-based assessments of flood risk and demonstrate how flooding will be managed or avoided.

Without a full flood risk assessment, the proposal **fails to meet the legal and environmental standards** set by both Irish and EU law. Approving such a development in an already flood-prone area would be unsafe, unsustainable, and contrary to the public interest.

These are the fields that they want to build wind turbines on? These fields are just a short distance from the proposed locations. This is the R516.







For all the reasons above, I respectfully request that the proposed wind farm be refused planning.

Kind Regards,

Roisin Keating.

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