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14th November 2025

Submission on Ballinlee Wind Power Plant (An Coimisiún Pleanála Ref. PAX91.323780)

To: The Secretary, An Coimisiún Pleanála

Project: Ballinlee Wind Power Plant

Location: Townlands of Ballincurra, Ballinlee South, Ballingayrou, Ballinrea, Knockuregare, Ballinlee North, Carrigeen & Camas South, Co. Limerick.

Scope of submission: This submission addresses the full set of planning and environmental documentation published on the applicant's project website and the An Coimisiún Pleanála case file (planning pack, EIAR Volumes I-IV, appendices, photomontages, TDR report, Noise appendices, Archaeology chapter and appendices, NIS/Appropriate Assessment documents, and the An Coimisiún Pleanála pre-application records).

Executive summary — reasons for objection

I object to the proposed development because the application, as submitted, fails to demonstrate that it will avoid or satisfactorily mitigate significant adverse impacts to: (a) biodiversity (including birds/raptors and habitats); (b) landscape and visual amenities (including effects on heritage landscapes); (c) residential amenity via noise, low frequency noise and shadow flicker; (d) water and soils where permanent storage heaps and construction compounds are proposed; (e) cultural heritage and archaeology; and (f) via cumulative impacts together with other local projects and the environmental consequences of the Turbine Delivery Route (TDR). (g) The design does not comply with the Wind Energy Development Guidelines 2006 and the Draft Revised Wind Energy Development Guidelines December 2019. (h) Inadequate emergency access and fire safety inefficiencies. (i) The public consultation process does not comply with requirements of relevant Irish and EU planning Law with regards to public engagement requirements for an SID. (j) For many of these topics the application relies on incomplete baseline information, unjustified assumptions or mitigation that is either weak, not binding, or post-consent in nature.

The application documents relied upon for the assessments are listed and critiqued below.

Documents reviewed (documents published by the applicant and ABP)

Documents reviewed on the applicant's project site and the An Coimisiún Pleanála case file :

From the Project Environmental Planning Submission (EIAR Volumes / Chapters & Appendices): Volume I (Non-Technical Summary), Volume II (Main EIAR Chapters 1–19), Volume III EIAR Appendices 1-17) and Volume IV Photomontages.

From the Project Planning Submission (Planning Application Form and Appendices, Planning Statement, AA Screening, NIS, Newspaper Adverts, Planning Application Drawings, Planning Boundary, Site Notice).

From An Coimisiún Pleanála: Pre-application case record and Inspector's Reports / Direction showing ACP Section 37B process and confirmation that the scheme is strategic infrastructure (PC91.320745 & PAX91.323780)

1)Material contravention of national and regional planning policy

The proposed development materially contravenes national and regional planning policy and would have significant adverse effects on residential amenity, landscape character, health, and wellbeing.

1a. Conflict with the National Planning Framework (NPF)

The proposal directly conflicts with key National Policy Objectives (NPOs) in the National Planning Framework (Project Ireland 2040), including:

- **NPO 23** – Facilitate renewable energy development in accordance with proper planning and sustainable development.
- **NPO 27** – Support healthy, liveable communities.
- **NPO 60 & 62** – Protect landscape character, natural and cultural heritage.

This development represents industrial-scale infrastructure in a sensitive rural landscape without adequate demonstration of local capacity or amenity protection.

The resulting impacts on the rural environment, local community, and residential health are inconsistent with NPO 23, 27, 60, and 62.

1b Conflict with the National Landscape Strategy (2015–2025, update pending)

The National Landscape Strategy seeks to protect Ireland's distinctive landscapes and visual resources. This wind park proposal, by introducing 17 turbines exceeding 160m in height, would irreversibly alter the rural landscape and erode visual coherence.

The Landscape and Visual Impact Assessment (LVIA) submitted fails to adequately address long-distance visibility, cumulative skyline intrusion, or the sensitivity of the area's ridgelines. The proposal therefore conflicts with the Strategy's (update pending) principles of landscape protection and stewardship.

1c. Conflict with the Climate Action Plan (CAP 2024) and the Principle of Just Transition

The Climate Action Plan 2024 requires renewable energy projects to be delivered in balance with social equity, community benefit, and environmental protection.

The Ballinlee Wind Power Plant undermines the Just Transition principle of the Climate Action Plan, which aims to ensure that rural communities are not disproportionately burdened by energy infrastructure.

1d Conflict with the National Biodiversity Action Plan (NBAP 2023–2030)

The NBAP requires that renewable projects protect biodiversity, habitats, and ecosystem services. The proposal involves turbine and access infrastructure on peat soils, posing risks to hydrology, soil stability, and downstream habitats.

The EIAR lacks a robust mitigation hierarchy or commitments to habitat restoration and long-term ecological monitoring, contrary to NBAP objectives.

1e. Conflict with National Waste Management Plan for a Circular Economy (NWMPCE, 2022–2028)

The National Waste Management Plan for a Circular Economy (NWMPCE, 2022–2028) emphasises the need for sustainable waste handling, reuse, and recovery of construction materials.

The application does not set out in any significant detail how excavated soils, turbine foundation materials, or peat waste will be reused or recovered. This deficiency contradicts the Plan's requirements for circular economy practices and proper waste management under construction phase obligations.

1f Contravention of Limerick City & County Council Development

The applicant planning submission is in direct contravention of the Limerick County Development Plan 2022-2028

Policy EH P1 Protection of Natural Heritage and Biodiversity .It is a policy of the Council to: a) Protect and conserve Limerick's natural heritage and biodiversity, in particular, areas designated as part of the European Sites Natura 2000 network, such as Special Protection Areas (SPAs) and Special Areas of Conservations (SACs), in accordance with relevant EU Directives and national legislation and guidelines. b) Maintain the conservation value of all Natural Heritage Areas and proposed Natural Heritage Areas (pNHAs) for the benefit of existing and future generations.

Objective EH O48 Assessment and Recognition of Archaeological Landscapes It is an objective of the Council to designate archaeological landscapes as part of an ongoing appraisal for Historic Landscape Characterisation of Limerick

Policy EH P4 Compliance with Limerick’s Heritage Plan It is a policy of the Council to place ecological and environmental issues at the centre of planning policies and decisions and in doing so, will adhere to the objectives set out in Limerick’s Heritage Plan 2017-2030.

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.

Objective EH O11 Invasive Species It is an objective of the Council to: a) Work with and facilitate the work of agencies addressing the issue of terrestrial and aquatic invasive alien species (IAS), by implementing biosecurity measures, selected control measures and surveys, where appropriate c) Require the submission of a control and management program for the particular invasive species as part of the planning process, if developments are proposed on sites where invasive species are present. d) Employ biosecurity measures to prevent the spread of invasive alien species and disease and to insist that all such measures are employed on all development sites.

Objective EH O15 Ground Water, Surface Water Protection and River Basin Management Plans .It is an objective of the Council to: a) Protect ground and surface water resources and to take into account the requirement of the Water Framework Directive when dealing with planning and land use issues. b) Implement the provisions of the River Basin Management Plan 2022 – 2028 and any succeeding plan. The filling of wetlands, surface water features and modifications and drainage of peatlands shall generally be prohibited. c) Implement the measures put forward in the Limerick Groundwater Protection Plan, in assessing planning applications and their consequences for ground water.

Objective EH O18 Riparian Buffers. It is an objective of the Council to maintain riverbank vegetation along watercourses and ensure protection of a 20m riparian buffer zone on greenfield sites and sites are maintained free from development. Proposals shall have cognisance of the contents of the Inland Fisheries Ireland document Planning for Watercourses in Urban Environments.

LCA O5 Lough Gur. Lough Gur is one of the most significant archaeological sites in Limerick. Topographically it is made up of a series of rolling hills surrounding the lake, which is the centre point of the area. The landscape is pastoral with a long history of human habitation. The presence of a wide variety of archaeological monuments is one of the characteristic features of the area. The area around Lough Gur, with its pleasant rural setting and views of the lake and its well developed hedgerows, is also an attractive amenity and is widely used by locals and visitors alike.

Specific objectives include: a) Safeguard the visual amenity of the area and to have regard to the views and prospects in and out of Lough Gur.) Restrict development including residential development in the area of Special Development Control, shown on Map 6.3 except in exceptional circumstances. Appropriate tourism development and extensions to existing properties, which respect the special character of Lough Gur will be considered. c) To have regard to the archaeological importance and richness of the area indicated on Map 6.3 as a zone of archaeological amenity. Any developments within the zone will be required to provide for an archaeological examination during the course of excavations, or other ground disturbance. d) To safeguard the existence of Natural Heritage Areas and the Wildfowl sanctuary when assessing applications for development in the area. **Objective EH O44** also notes it is an objective of the Council to protect the unique archaeological landscape at Lough Gur and to support the archaeological objectives in the Lough Gur Environment and Management Study 2009.

Policy EH P7 It is a policy of the Council to proactively manage environmental noise, where it may have a significant adverse impact on the health and quality of life of communities in Limerick and to support the aims of the Environmental Noise Regulations, through the development and implementation of Noise Action Plans.

Objective EH O32 Historical Landscapes It is an objective of the Council to, during the lifetime of the Plan, develop an historical landscape assessment process, which will identify key historical landscapes within Limerick.

Objective EH O31 Views and Prospects . It is an objective of the Council to: a) Preserve, protect and encourage the enjoyment of views and prospects of special amenity value or special interests and to prevent development, which would block or otherwise interfere with views and/or prospects. b) In areas where scenic views and prospects are listed in the Plan, there will be a presumption against development, except that required to facilitate farming and appropriate tourism and related activities. The development must be appropriately designed so that it can be integrated into the landscape.

Objective IN O1 Climate Action in Infrastructure Planning It is an objective of the Council to: a) Require all infrastructure development, whether above ground or subterranean, to avoid flood risk areas.

In summary, the proposed Ballinlee Wind Power Plant:

- Contradicts multiple national and regional policy frameworks.
- Fails to protect rural landscape character and community wellbeing.
- Does not demonstrate compliance with sustainable development principles required under Irish planning law.

It is therefore submitted that the proposal materially contravenes the objectives of the following:

- National Planning Framework,
- Wind Energy Development Guidelines (2006 & Draft 2019),

- Southern Regional Spatial and Economic Strategy,
- National Landscape Strategy,
- Climate Action Plan 2024, and
- National Biodiversity Action Plan.

Accordingly, the proposed development is inconsistent with the proper planning and sustainable development of the area, and I would respectfully request An Coimisiún Pleanála to refuse permission.

2) Planning Application does not comply with Wind Energy Development Guidelines 2006 and the Draft Revised Wind Energy Development Guidelines December 2019.

The Wind Energy Development Guidelines 2006 on page 34 states “***a distance of not less than two rotor blades from adjoining property boundaries will generally be acceptable***”.

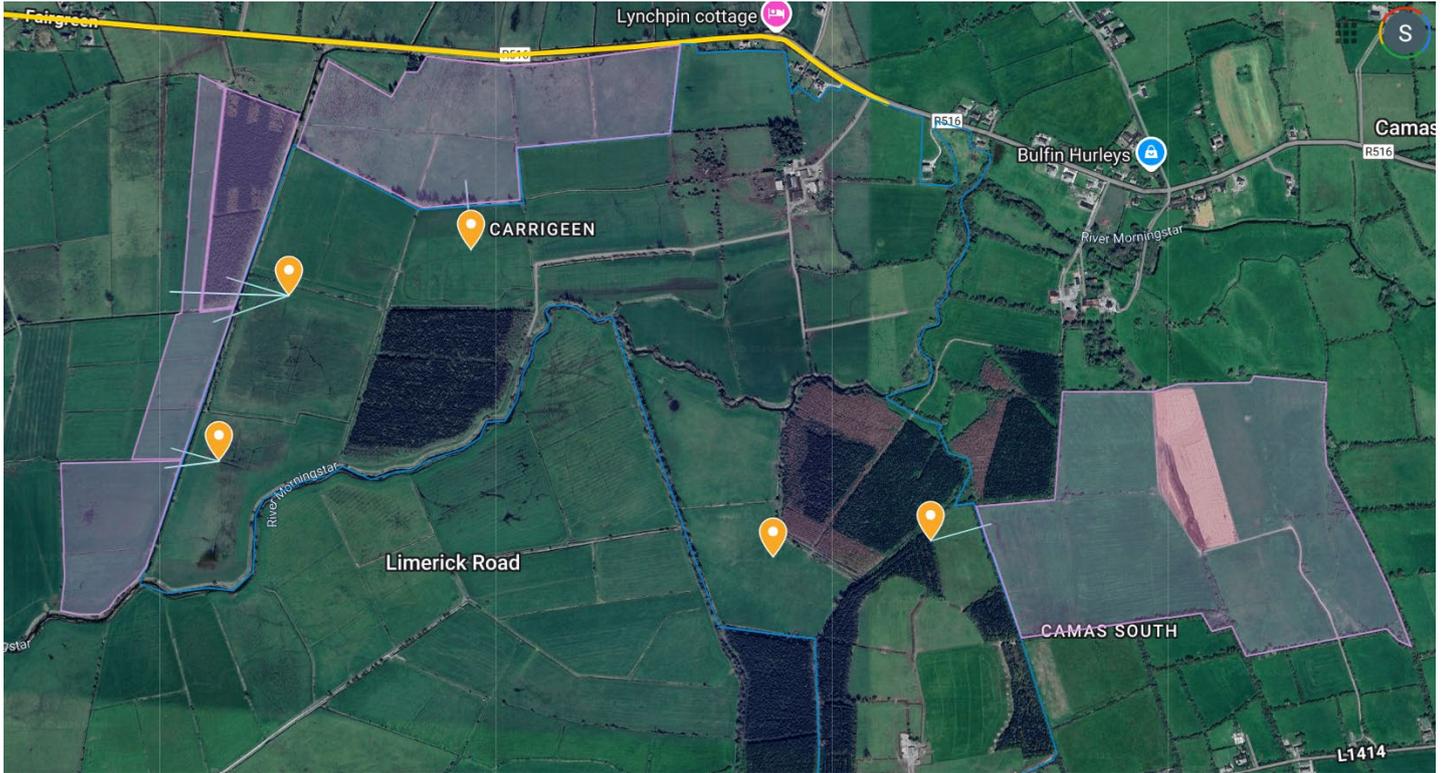
The Draft Revised Wind Energy Development Guidelines December 2019 on Page 49 state “***a distance of not less than two rotor blades from adjoining property boundaries will generally be acceptable***”.

Two rotor blades in the applicant submission is 136m.

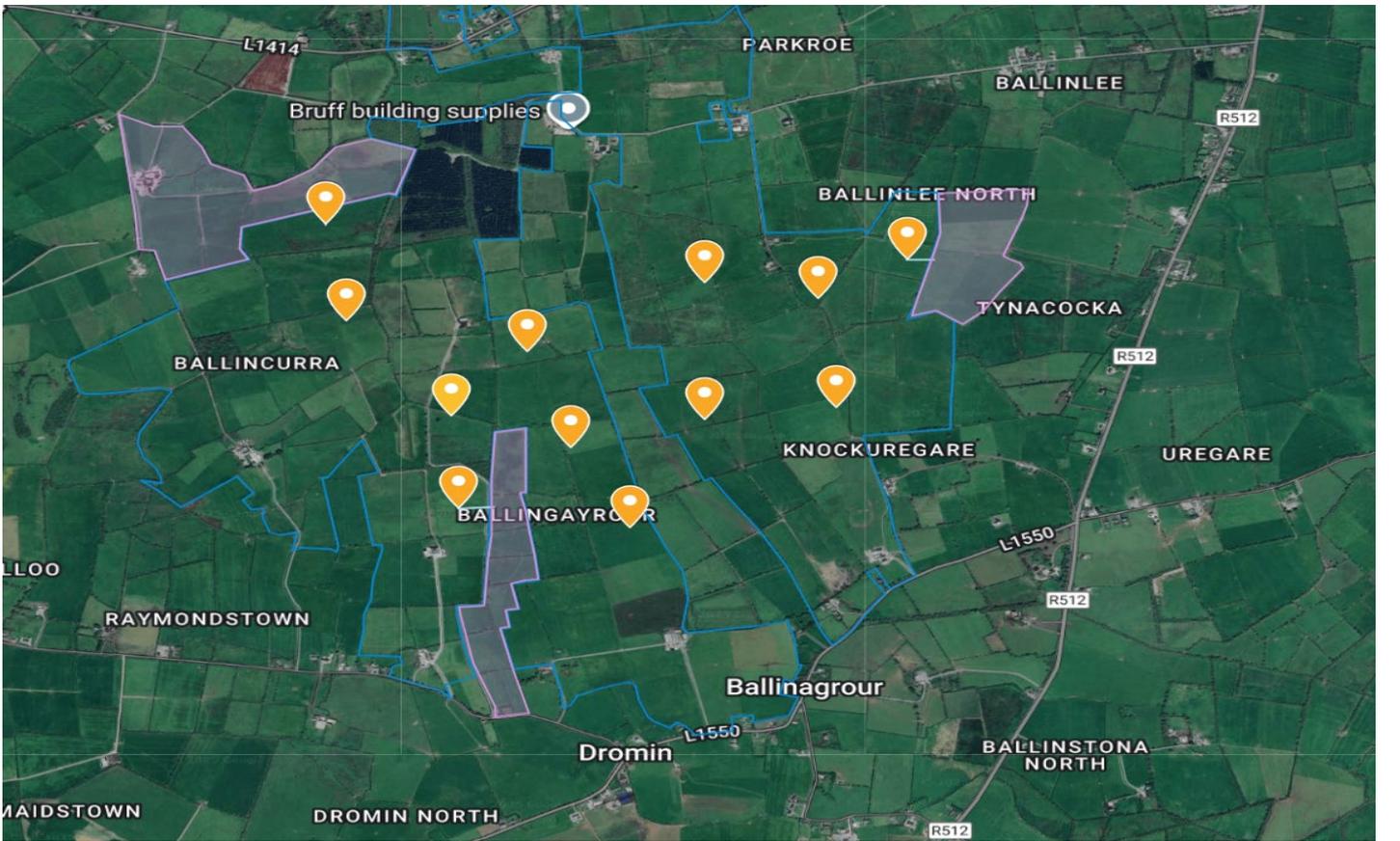
Wind Turbines T1, T2, T3, T5, T6, T9, and T15 are all less than two rotor blades from adjoining property boundaries.

Adjoining Boundary Folio No.	Turbine	Distance	Unit
LK13481	T1	110	m
LK4858	T2	110	m
LK7387F	T2	130	m
LK12589	T3	88	m
LK7387F	T3	82	m
LK1992F	T5	128	m
LK4915F	T6	80	m
LK71	T9	104	m
LK6256	T15	81	m

Consent letters from the above adjoining Folio owners agreeing to a lesser distance of two rotor blades have not been submitted in the applicant submission. It is not clear if consent has been obtained from the adjoining property owners and the applicant failed to submit letters confirming this or if the adjoining landowners are unaware of the proximity of the relevant turbines to their boundary, either way the applicant submission is incomplete and it fails to comply with both the Wind Energy Development Guidelines 2006 and the Draft Revised Wind Energy Development Guidelines December 2019.



T1, T2 & T3 mapped above with adjacent neighbouring properties.



T5, T6, T9 & T15 mapped above with adjacent neighbouring properties.

The registered landowner of Folio 23715F has consented to being aware that the nearest turbine to their dwelling house is 500m, in compliance with current wind energy development guidelines and that they are also aware the sitting of the said turbine does not fall within the proposed draft revised wind energy development guidelines. This contradicts the applicant's planning application which repeatedly notes the wind power plant design complies with both the current and the draft revised wind energy guidelines.

I respectfully request An Coimisiún Pleanála to refuse permission on the following grounds;

- 1) There are nine instances in the applicant submission where the location of a turbine is less than two rotor blades from an adjoining landowner's boundary.
- 2) Consent letters from the said adjoining landowners agreeing to a distance less than two rotor blades have not been submitted by the applicant. The applicant submission is incomplete in this regard.
- 3) The applicant submission fails to comply with both the Wind Energy Development Guidelines 2006 and the Draft Revised Wind Energy Development Guidelines December 2019 despite various references to compliance with same in the applicant submission.

3) Inadequate ecological baseline, species surveys and biodiversity mitigation

The applicant in their EIAR outlines field surveys and baseline assessments undertaken and sets out their proposed mitigation and a proposed ecological monitoring regime (see Biodiversity & Ornithology chapters and appendices).

I wish to note the following observations:

- **Survey duration/seasonality & representativeness:** The Ornithology baseline and ecology appendices must demonstrate adequate seasonal coverage, including migration periods and peak raptor activity and multi-year data where necessary for robust collision risk modelling. Year 1 had 6 Vantage Points vs. 7 later — a gap on the eastern side.
 - Hours per Vantage Point were uneven across years.
 - No nocturnal Vantage Point coverage or thermal/night observations. Where undertaken, nocturnal activity was estimated from diurnal data.
 - CRM used only Years 2 & 3 data, omitting one full season (October 2021–September 2022) therefore this is not fully representative.
- Appendix 7B (Tables 3–8) show that only six Vantage Points were used in Year 1, with an additional eastern Vantage Point added in Year 2 to correct a coverage gap. This confirms that baseline coverage in the first survey year was incomplete. Despite this, Year 1 data was excluded from Collision Risk Modelling, which relies solely on Years 2–3 (Chapter 7, 7.3.3). This reduces representativeness and underestimates uncertainty.

- The EIAR acknowledges (Appendix 7B 3.1) that no nocturnal Vantage Point watches were carried out, nocturnal activity was instead inferred by professional judgement. This approach does not provide realistic data for nocturnal migrants, owls, or waterbirds known to undertake night-time flights.
- The EIAR fails to demonstrate that interannual variability in bird activity has been adequately characterised. National guidance (EPA, 2022; CIEEM, 2018) requires that ecological surveys capture representative seasonal and spatial variation. The omission of Year 1 data and the absence of nocturnal coverage undermine compliance with these principles.
- The EIAR must present quantified collision risk modelling for all relevant species and then present cumulative collision risk with nearby projects (solar and wind power plants). The treatment of collision risk and displacement in Chapter 7 and Appendix 7C fails to demonstrate full representativeness and cumulative completeness. Only Years 2 and 3 of vantage-point data were modelled; Year 1 was excluded despite being collected. No nocturnal vantage-point or radar surveys were undertaken, and nocturnal activity was inferred by professional judgement. The CRM therefore under-represents potential collision risk to Whooper Swan, Curlew and other species. Furthermore, the cumulative assessment omits nearby operational and permitted wind plants, refer to Section 11 of this Submission for further details.
- Additionally, the applicant does not assess proposed wind plants contrary to EPA Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (2022) guidance requiring consideration of all ‘reasonably foreseeable’ projects. (refer to other proposed developments in Section 11 of this submission).
- In the absence of nocturnal data, sensitivity analysis, and a complete cumulative dataset, the applicant has not demonstrated that collision or displacement risks have been adequately assessed.
- Biodiversity Net Gain, compensation and binding measures: The EIAR’s Schedule of Mitigation / HSMP appendices must convert proposed measures into enforceable, measurable commitments. The application does not provide a detailed quantitative assessment of biodiversity impacts and gains, such as a biodiversity metric or habitat quality index. The proposed monitoring framework should include specific indicators, timelines, and responsibilities to ensure effective oversight. The applicant did not adequately engage with local communities in the planning processes to enhance the effectiveness of biodiversity measures and foster public support.
- Chapter 7 (7.3.2.4.1) references targeted barn owl surveys, with study area identified incl 1km and 2km buffers. As a local living within the study area, it is most surprising that no barn owls were recorded. I have noted on a number of occasions sighting of barn owls close to my home. The Barn Owl is red listed, has been sighted in the townlands of the proposed development and it cannot be concluded that the development and the 1km buffer does not support a barn owl population.

I respectfully request An Coimisiún Pleanála refuse permission:

- 1) The applicant does not provide full survey datasets, full collision risk outputs (incl. cumulative modelling).

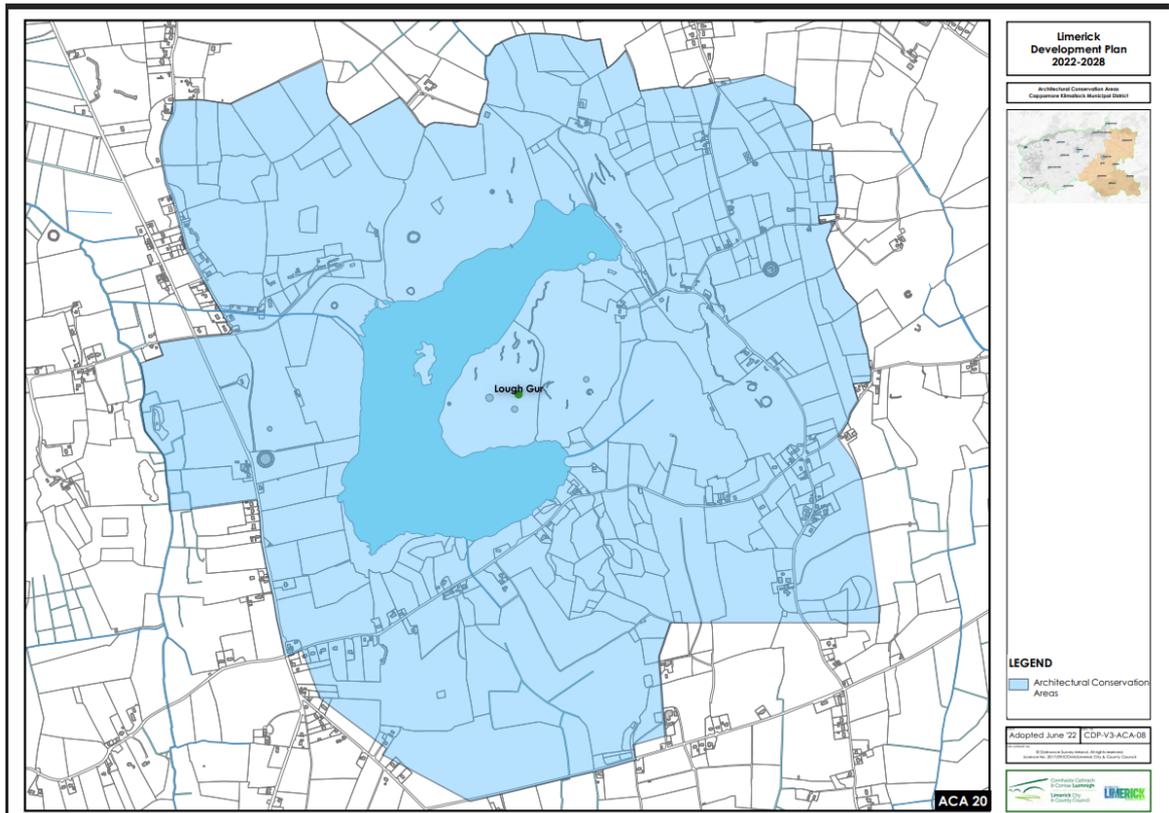
- 2) The applicant EIAR fails to demonstrate a quantifiable biodiversity outcome or long-term monitoring plan with legally secured compensatory/offset habitat measures and a binding, funded long-term monitoring and adaptive management plan.
- 3) The applicant does not comply with EPA 2022 “Guidelines on the information to be contained in EIAR’s”.

4) Landscape & Visual Impact Assessment (LVIA) — including photomontages and cumulative visual effects

The applicant in their EIAR Volume IV and Appendix 12A include an LVIA chapter and 22 representative viewpoint photomontages are included.

I wish to bring the following observations to the attention of An Coimisiún Pleanála:

- Selection of viewpoints & visual envelope: Although 22 representative viewpoints are included, the LVIA must ensure representative viewpoints include sensitive cultural landscapes such as Lough Gur ACA and vistas from identified heritage assets. Whilst, the applicant includes Lough Gur ACA in their representative viewpoints, VP19 (Appendix 12A Page 12/14), they omit the actual viewshed and settlement edges
- Appendix 12A Page 12/14 notes VP19 Lough Gur ACA Sensitivity as ‘High-Medium’ however the applicant goes on to state **“The blades will rotate amongst intervening vegetation and are not particularly conspicuous at this scale and distance except that they are on alignment with the main aspect of the vista. There will be some degree of visual ambiguity relating to scale and distance as well as the actual landscape context of the turbines relative to that of the foreground enclosed Lough.”** The applicant openly states that there will be **“some degree of visual ambiguity”** however they don’t expand or clarify further or provide detail around this but somehow manage to conclude that **“the magnitude of visual impact is considered to be low and the quality of the effect is considered to be negative”**. The applicant does not satisfactorily substantiate their conclusion, which is baseless on the evidence put forward in their planning documentation.
- Lough Gur Visitor Centre had 102,000 visitors in 2021 (Source: Failte Ireland Annual Visitor Attractions Survey, 2019-2021 (published May 2022). Limerick City and County Development Plan 2022 – 2028 Volume 3 (ACA 20 Lough Gur) notes that **“This ACA is designated to ensure that new development is compatible with the Lough Gur landscape of rolling hills surrounding the lough and the complex, significant archaeological features designated by the OPW on its Sites and Monument Record. An Area of Special Development Control also applies to this area, given the dense concentration of archaeological structures and the preservation of the integrity of area”**.



Lough Gur ACA Map: Source Limerick County Development Plan 2022-2028

- It is an objective of the Limerick County Development Plan 2022-2028 to protect and maintain the integrity of this Area of Special Development Control. The proposed 17 turbine wind plant, with the cable route passing the R512 adjacent to the Lough Gur ACA does not align with the existing Area of Special Development Control designation. The Limerick County Development Plan 2022-2028, LCA 05 notes it is an objective of the Council to safeguard the visual amenity of the area and to have regard to the views and prospects in and out of Lough Gur ACA.
- Appendix 12A Page 8/14 notes VP11 Local Road at Dromin North, where sensitivity is Medium -Low. The magnitude of visual impact is noted as follows by the applicant ***“The proposed turbines will be fully visible from here at a prominent scale stretching across the northern quarters of the view in close proximity. They will have a dominant visual presence and will be the most distinctive aspect of the northerly vista. They are seen in a clear and unambiguous manner from base to tip and there is a reasonable sense of visual permeability through the wind farm. There is a strong sense of perspective generated by the scale differential between the nearest and furthest turbines, which highlights the depth of the layout and the sense of space and distance across the plains. The windfarm brings a new form of development consisting of tall moving structures that will considerably increase the intensity of built development within the scene”*** The applicant notes the ‘dominant visual presence’ and the increase in the intensity of the built environment, noting the turbines will be seen from base to tip. How can the applicant conclude that on the balance of the factors noted and even though visual impact is considered high

that the quality of effect will be negative. The applicant has not substantiated this conclusion, and they have not demonstrated the effect.

- My home will be 687m from Turbine No. 9, 1,092m from T8, 1,184m from T11, 1,123m from T12, 1,410m from T7, 1,577m from T16, 1,810m from T6, 1,956m from T17, 1,990m from T13, T14 & T15 are within 2,000m & 2,500m, with all 17 turbines visible from my home. The visual effect of the wind turbines, given their height, scale and number will be detrimental to the rural low-lying area, it will be detrimental to the families living in the area in close proximity to the wind plant. An Coimisiún Pleanála decision to refuse planning permission for Coolglass Windfarm and the High Court decision to uphold the refusal due to significant visual impacts affirms this. The court highlighted the importance of considering visual amenity and the integrity of local planning policies, even in the context of national climate objectives.
- The photomontage set should include both leaf-on and leaf-off conditions.
- The applicant has included photomontages, but the LVIA does not convincingly demonstrate that all sensitive receptors were included or that micro-siting options were tested to reduce skyline intrusion.
- There is a clear lack of residential visual amenity assessment. The photomontage viewpoint selection appears to underrepresent residential receptors. It would appear that the applicant has chosen viewpoints that do not present a true visual impact assessment and the LVIA omits specific analysis of residential visual amenity. A number of sensitive receptors appear to have been omitted from EIAR Chapter IV and Appendix 12A. The LVIA omits a residential visual amenity assessment for a number of dwellings within 2 km of turbines, thereby failing to consider potential significant effects on the visual setting and rural amenity of local residents, contrary to national and local guidance.
- Cumulative visual effects: The LVIA must assess cumulative visibility and skyline effects with the full set of consented and proposed renewable projects in the Zone of Visual Influence (ZVI). The appendices indicate ZTV maps exist (Appendix 12B), but the cumulative analysis appears to be partial in scope or not fully transparent in how other developments were selected/parametrised.

I respectfully request An Coimisiún Pleanála to refuse the applicant submission on the basis that:

- 1) Photomontages are omitted from sensitive receptors Lough Gur ACA **viewshed** and settlement edges.
- 2) The applicant does not comply with Objective EH O16 of the Limerick City and County Council Development Plan 2022-2028.
- 3) Leaf-on/leaf-off montages are not provided; this omission represents an underassessment of seasonal visibility.
- 4) A full, transparent cumulative visual impact addendum that tests alternative micro-siting to reduce skyline effects have not been adequately or robustly addressed in the applicant's submission.
- 5) The irregular arrangement of turbines with unequal spacing, which don't appear to take field boundaries into account is completely out of character in this landscape character area.

- 6) The LVIA does not meet the standards required under the Planning and Development Regulations, EPA (2022) EIAR Guidelines, or the Limerick County Development Plan 2022–2028. The assessment understates landscape and visual effects and fails to present a transparent and credible appraisal of the project’s visual impact. Limerick County Development Plan 2022-2028 Objective CAF O29 Wind Energy Development and Environmental Considerations ***“It is an objective of the Council to facilitate the development of wind energy in an environmentally sustainable manner, ensuring proposals are consistent with the landscape character objectives of the Plan, the protection of the natural and built environment and the visual and residential amenities of the area”***
- 7) The LVIA fails to evaluate the impact of turbine visibility on designated protected structures, and heritage landscapes in the wider area, such as the c. 1800 thatched cottage identified as Structure 34 in the applicant’s submission.
- 8) The LVIA methodology must be questioned by the An Coimisiún Pleanála Inspector. Please refer to the LVIA baseline images from the applicant planning submission below in this regard.:





5) Noise (operational & construction), reliance of financially involved allowance, low frequency noise, and amplitude modulation (AM)

The applicant has submitted in EIAR Volume II, Chapter 13 a Noise & Vibration chapter and monitoring, model parameters and predicted levels in Appendices 13A–13.

- Financially Involved Allowance: Volume II, Chapter 13 – *Noise and Vibration*, relies on the application of the “financially involved” noise allowance under ETSU-R-97(UK Guidance, not legally adopted in Ireland) to justify predicted exceedances of standard noise limits at several dwellings. The applicant notes six Noise Sensitive Locations (NSLs) where operational noise is predicted to approach or exceed the adopted limits by up to 0.8 dB. Three of these are deemed “financially involved” and are therefore assessed against a higher threshold of 45 dB(A), rather than the 43 dB(A) night-time or 40 dB(A) daytime limit applicable to other dwellings. This approach effectively masks exceedances that would otherwise occur if a consistent standard were applied. There are also three non-financially involved dwellings that exceed the limits noted but their details, location etc are not disclosed in the applicant submission. Chapter 13.5.3.11 notes **“Of the 3no. NSLs that are not financially involved, the Daytime Amenity limit is exceeded at the 6m/s wind speed bin by 0.1dB at NSL065 and by 0.4dB at NSL370 and NSL422”**. Third parties cannot identify the specific location or

designations of the said NSL's, therefore they cannot determine the effect on their property. Noise does not stop at property boundaries, and residents of adjacent or nearby non-involved homes will experience the same acoustic environment. All dwellings should be afforded the same noise limits regardless of financial involvement. The higher limit introduces inequitable protection for neighbouring dwellings and households and undermines the principle of environmental justice and predicted impacts may be understated. I respectfully request that An Coimisiún Pleanála apply a single, consistent noise criterion for all occupied dwellings, regardless of financial involvement in their assessment of this planning application. Operational noise from the proposed development should comply with the limits for non-involved properties as defined in ETSU-R-97 and the 2006 Wind Energy Development Guidelines and the Draft Revised Wind Energy Development Guidelines December 2019.

- **Inadequate Approach to Amplitude Modulation (AM) and Tonal Noise:**
The EIAR acknowledges amplitude modulation (AM) as a potential source of nuisance but proposes a purely reactive approach, whereby AM will only be investigated following a noise complaint. Similarly, the assessment relies on turbine manufacturer warranties to prevent tonal noise but does not commit to independent post-construction verification. This reactive approach is inadequate to safeguard residential amenity, as evidence indicates AM and tonal noise can cause significant annoyance even when LA90 limits are met.
- **Baseline sampling & receptor selection:** The noise appendices list monitoring detail (Appendix 13A) but background monitoring period/seasonality and location representativeness for all Noise Sensitive Locations (NSLs) are not clearly identifiable. If baseline data were limited or not representative (e.g., not capturing night-time low wind conditions), predicted impacts may be understated.
- **Amplitude modulation & low frequency noise:** The modelled dB(A) outcomes alone do not address AM and infrasound/low frequency components linked to sleep disturbance and community complaints. There is no detailed AM assessment or operational monitoring and curtailment protocol in the schedule of mitigation.
- **Construction vibration & piling:** The CEMP and traffic appendices (Appendix 2A CEMP; Appendix 16A Traffic Management Plan) must include strict limits and monitoring procedures for piling, compaction and heavy plant near dwellings however the applicants' submissions lack clear trigger/response procedures.
- **No Borrow Pit Management Plan has been submitted, and there are no detailed method statements, blasting procedures, vibration limits noted.** Blasting is referenced in the CEMP but not assessed in the EIAR's noise or vibration chapters. Volume 2, Chapter 4 Civil Engineering in 4.10 Borrow Pits notes that ***"the combined areas of the borrow pits is 60,700m²"*** and ***"a minimum borrow pit depth of 3.250m"***. The rock layer produces, ***"approximately, 142,650m³ of rock"***, which the applicant further notes will ***"result in 99,852m³ of usable site won aggregate"***, These significant volumes noted are "minimum", in reality could be greater, yet the applicant does not address the consequential noise from vibration, blasting, drilling etc. in areas where existing dwellings are in proximity to the proposed borrow pits. The activity is effectively a quarrying process and as such should have been assessed in that manner.
- My home will be 687m from Turbine No. 9, 1,092m from T8, 1,184m from T11, 1,123m from T12, 1,410m from T7, 1,577m from T16, 1,810m from T6, 1,956m from T17, 1,990m from T13, T14 & T15 are within 2,000m & 2,500m, etc, etc. The cumulative

effect of the 17 turbines cannot be underestimated when considering effect of all forms of noise and nuisance on nearby residents. The recent High Court ruling, in the case of Raymond Byrne and Lorna Moorhead's -v- ABO Wind Ireland Ltd, ABO Wind OMS Ireland Ltd and Wexwind Ltd reaffirms this with regard to noise, vibration and shadow flicker emitted from Gibbet Hill Wind Farm.

I respectfully request that An Coimisiún Pleanála refuse permission on the following grounds:

- 1) The EIAR fails to provide adequate protection for nearby residents, relies on a financial allowance to justify exceedances, and does not proactively manage amplitude modulation or tonal noise
- 2) An AM and infrasound assessment with worst-case scenarios is not provided,
- 3) Blasting is referenced in the CEMP but not assessed in the EIAR's noise or vibration chapters
- 4) Inequitable noise thresholds are applied by the applicant. ETSU-R-97 is UK Guidance and not legally adopted in Ireland.
- 5) There are no legally enforceable operational noise limits and curtailment protocols that the applicant must abide by during the construction process.
- 6) No Borrow Pit Management Plan has been submitted.
- 7) The proposed development is in breach of RPO 131 of Southern Regional Spatial and Economic Strategy (RSES, 2020–2032).
- 8) The proposed development is inconsistent with the intent of END Directive 2002/49/EC concerning community noise exposure.
- 9) The proposed development contravenes the Limerick County Development Plan 2022-2028, Objective EH O22 Commercial and Industrial Noise and Policy EH P7 Environmental Noise well-being of Limerick's resources.

6.) Shadow flicker

The applicant addresses the issue of Shadow Flicker in Chapter 15 of their EIAR, prepared by Malachy Walsh & Partners. Chapter 15.1 Introduction advises that ***"This chapter considers the potential impact to Population and Human Health from shadow flicker generated by the proposed development during the operational phase"***

Chapter 15 does not mention or address any of the potential impacts to Population and Human Health from shadow flicker. 15.9 Conclusion is the next part of Chapter 15 where the word health is even mentioned and the Conclusion states that ***"without mitigation, this would constitute a significant, adverse, long-term effect on population and human health and would represent non-compliance with the current guidelines."***

The applicant fails to demonstrate in any significant detail their proposed mitigation measures. 15.7.2 advises a programmable shadow flicker module will be installed in order to allow the control of turbines to eliminate shadow flicker at a receptor, this requires the identified dates and times of day of potential occurrence of shadow flicker at dwellings within the shadow flicker study area to be inserted into the SFCM computer program.

The applicant does not address how they will predict the exact times of day when shadow flicker is predicted to occur and from which turbine for each receptor. This is no more than guess work at best and not an accurate basis for implementation of mitigation measures however the residual effect is noted as follows **“as shadow flicker will be eliminated at receptors there will be no significant residual effect”** The applicant has not demonstrated beyond reasonable doubt, in fact has not demonstrated at all, with the support of any conclusive results that shadow flicker will be eliminated. The applicant does not detail how the proposed mitigation will be implemented or monitored.

Chapter 15 does advise no flicker will occur **“if blinds or curtains are drawn at the receptor location”**. Are homeowners in the Bruff Dromin Athlacca Balinlee and surrounding areas expected to pull their curtains and close their blinds in attempt to enjoy their rightful enjoyment of their homes?

Wind Energy Ireland advises that a zero-shadow flicker requirement is possible, but it is subject to incorporation of **“some essential clarifications”**, furthermore it advises this is completely technology dependent. <https://windenergyireland.com/latest-news/3180-blog-draft-revised-wind-energy-development-guidelines>

EIAR Volume II, Chapter 05 (Population & Human Health): **“Using the conservative 1.5 km study area ... 279 dwellings were identified.”** Yet the Shadow Flicker Analysis Report EIAR Volume 11, Chapter 15 advises a total of **228 homes** have been identified as having potential for **shadow flicker within 1.6m**. 15.1.3 advises the study area was identified using data from Limerick City and County Councils Planning database and GeoDirectory Databases yet the number of houses captured in the study area appears to fall well short of the 279 houses already identified elsewhere in the EIAR within a 1.5km zone. 15.2.2 notes **“Determining shadow flicker based on the 10-rotor diameter rule has been widely accepted across different European countries and is deemed to be an appropriate assessment area (Parsons Brinckerhoff, 2011)”**.

The study area is very questionable. Furthermore, only private residences are captured within the mentioned 1.60km of the proposed wind plant, further planning documents note that final as-constructed turbine coordinates may be provided later; if the siting changes, distances will change accordingly, and this shadow flicker analysis is subject to change accordingly. The applicant cannot demonstratively illustrate conclusive shadow flicker analysis results, and they most certainly do not address the impact in terms of nuisance and impact on human health of the local residents.

The applicant Shadow Flicker modelling for my home uses co-ordinates at the ridge of my house (centre of house), not the curtilage of my site, the difference is 72m.

15.1.3 was identified using data from Limerick City and County Council Planning database and GeoDirectory Databases. Only a total of 228 homes were identified with numerous homes not included in the Shadow Flicker Modelling Results. Secondary receptors are not addressed in the applicant’s submission. Places of Work, Schools, Public Buildings, are not captured in the study area. The Bruff Temporary Accommodation Centre has since 2022 been home to over 200 displaced persons fleeing the Russian Invasion of Ukraine. This accommodation, at the

former Ard Scoile Mhuire, Brackvoan, Bruff is c. 1.38KM from turbine T15 yet this is not taken into account in the applicant's shadow flicker assessment.

Competency of the Assessor is addressed in Chapter 15.2. The Assessor is noted as having qualifications in CAD and GIS. I would query how qualifications in CAD and GIS qualifies a person to perform shadow flicker analysis for the purposes of a planning application. No details of specialist software and data analysis qualifications are noted and therefore it cannot be assumed the relevant personnel have the necessary competency to conclusively report on the effects of shadow flicker as presented.

The scope, study area, methodology used, and assessment of impacts and effects are baseless, inaccurate and without factual supporting evidence.

I respectfully request An Coimisiún Pleanála to refuse permission on the basis that :

- Worst-case geometry & receptor list: Shadow flicker modelling must present worst-case hour-by-hour outputs for all nearby dwellings and secondary sensitive receptors (schools/work areas, /playgrounds). The applicant has not done this, they have omitted nearby dwellings from their assessment, and they have not included secondary sensitive receptors.
- The submitted schedule of shadow flicker mitigation is not presented as a legally enforceable curtailment or design solution for receptors exceeding guidance thresholds.
- Competency of assessor has not been demonstrated beyond reasonable doubt.
- The EIAR fails to comply with the Draft Revised Wind Energy Guidelines (2019) best practice for demonstrable zero shadow flicker at all occupied dwellings.

7) Cultural heritage & archaeology

EIAR Chapter 14 addresses Archaeology & Cultural Heritage and Appendix 14A (recorded monuments within 3 km) are provided.

Volume of Recordings

14.3.1 notes there are **thirty-four National Monuments** situated within 10km of the proposed Ballinlee Wind Farm and **no less than 340 recorded monuments** within a 3km radius zone established from the proposed location of wind turbines. This is a staggering figure in such a small study area. One Neolithic site, 82 recorded archaeological Bronze Age monuments, no less than thirty-eight ringforts from early Medieval times, seven recorded Castles, nine churches, five graveyards from High Medieval Times are all recorded within a 3km radius of the proposed wind farm.

In addition to the above, 14.3.1.6 notes there are **fifty-nine separate structures listed in the NIAH** within a 3km study of the wind turbines. One of these NIAH structures, also RPS, Structure No. 34 in Figure 14-5, Table 14-10.is the birthplace and home of generations of my family and currently in my parents' ownership and permanently occupied. Table 14-10 (Page 14-43) records this NIAH Structure as follows:

Map No.	NIAH Reg. No.	Name	Townland	Date	Rating	ITM Easting	ITM Northing	RPS	Distance to the nearest Turbine
34.	21903919	House	RAYMONDSTO WN	1780-1820	Regional	559629	632878	661	c.0.73km SW of T9

Structure No. 34 (RPS Reg No. 661, NIAH Reg No. 21903919) is in fact a Detached three-bay single-storey direct entry thatched house, built c. 1800 (date 1720-1820). The NBHS describes this ***“thatched house as an interesting example of vernacular domestic architecture in Ireland. Its traditional long, low form retains characteristic features such as the battered walls, steeply pitched roof, windbreak and irregular window fenestration. The outbuildings, traditionally arranged around a courtyard enhance the composition of the site”***. The proposed wind farm will be a mere 700m from this structure, towering over it the traditional vernacular architecture.

14.6.4.4 notes that all 17 turbines will be theoretically visible to differing levels from all locations of the Protected Structures and those listed in the NIAH. In addition, results of the LVIA data, desk-based research and site inspections were also undertaken and used to assess potential cultural visual impacts (CVI's). I refer Viewpoint Ref VP11a and VP11b below, adjoining site to Structure No. 34. How can it be concluded that that visual impact is 'slight'? The applicant's conclusion is unsupported.



It is unfortunate that the applicant chose viewpoints from the site immediately adjacent (to the right) of Structure No. 34, but not of Structure No. 34 where the visual impact of the industrial scale turbines, a mere c.700m from the thatched cottage from c.1800.

The above image indicates a photomontage taken by the applicant less than 100m from Structure 34.

See photographs of Structure No. 34 and proximity to the above applicant image below for information.



Image No. 1 Observers own image of Viewpoint 11a in applicant submission



Image No. 2 : Observers image with end of Viewpoint No. 11 a in applicant submission illustrating proximity of Protected Structure adjacent (c. 100m from Viewpoint No. 11 a in applicant submission)



Image No. 3 : Observers image of Thatched Cottage (RPS Reg No. 661, NIAH Reg No. 21903919) from circa 1800 adjacent to but omitted from Viewpoint 11a in applicant submission.

The proximity of the proposed development to Structure No. 34 does not align with **Objective EH O50** of the Limerick Development Plan 2022-2028. The sheer density of recorded monuments in the 3km study area means the area is unsuitable for the proposed scale of this strategic infrastructure development. Strategic infrastructure cannot be developed at the sacrifice of our cultural heritage. There are no mitigations that can alleviate the impact on the nearby castles, thatched cottages, churches and other relative structures in our beautiful rural area.

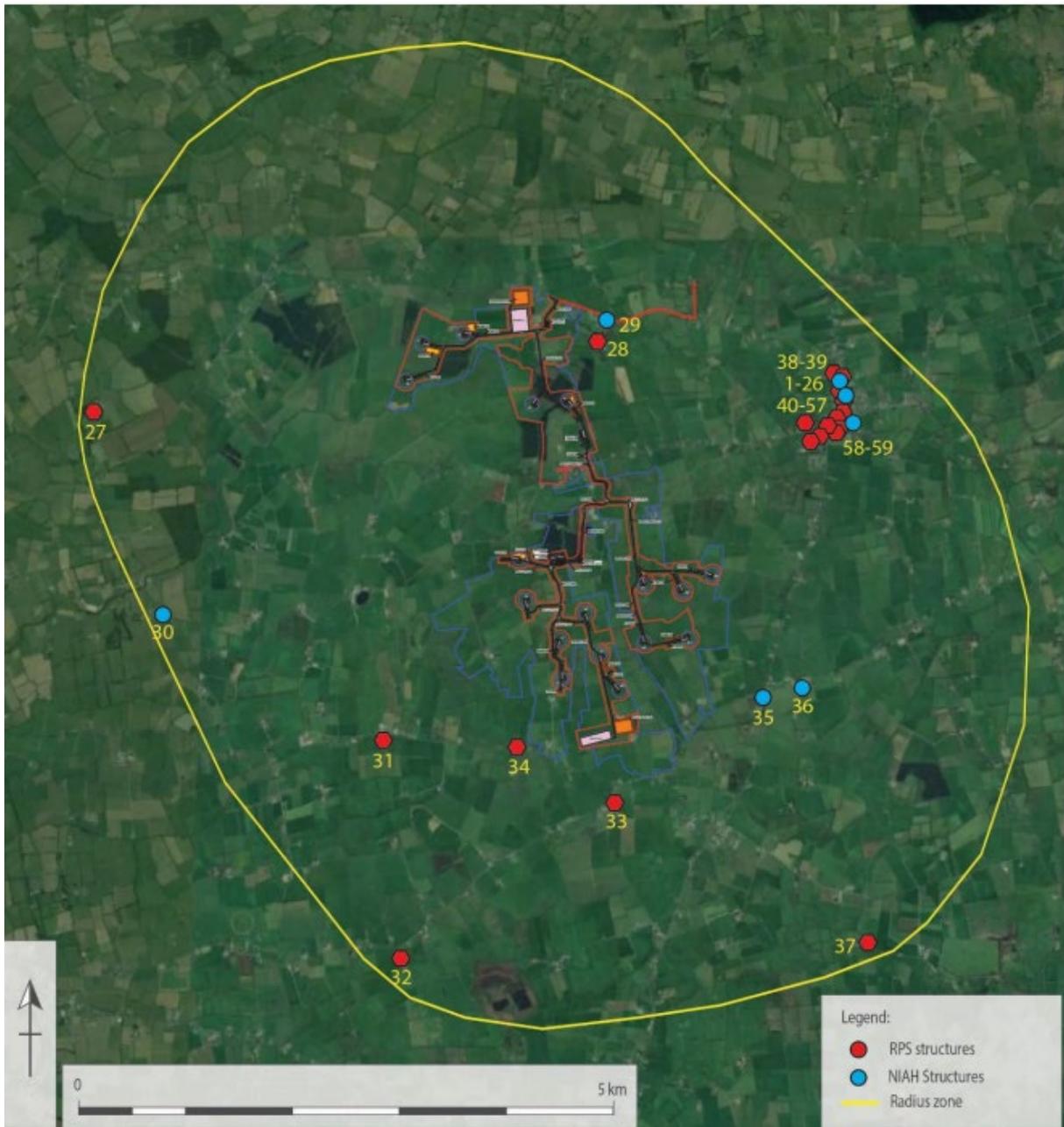


Figure 14-5: Location of heritage structures listed in NIAH and RPS within 3km radius study zone.

There are ten recorded monuments within the planning boundary and the applicants' states ***“there will be no direct physical effect to any of these recorded monuments during the construction phase”***. However, the applicant has not conclusively submitted any details around how these ten monuments will be protected. Similarly, the applicant doesn't address any indirect effects on these ten monuments. The applicant submission does not align with the provisions of **Objective EH O50** of the Limerick County Development Plan.

Lough Gur ACA

14.6.4 addresses National Monument No. 246 Lough Gur. The applicant undertook analysis of ZTV noting the proposed turbines will be visible to differing degrees or will be not visible at all depending on the location of the archaeological site there. Three viewpoints (VP17-19) were used to establish visual effect during LVIA assessment. The applicant does not set out how these viewpoints were strategically selected or what alternative viewpoints could have been utilised, potentially resulting in different results. The applicant concludes that the cultural visual effect is classified 'slight'. An Insufficient level of detail has been provided to concur with the applicant's conclusion, that the effect is slight.

The LVIA and Heritage Impact Assessment must account for all indirect effects on the setting of the Lough Gur Architectural Conservation Area (and other recorded monuments). Appendix 14A lists recorded monuments within 3 km, but the Archaeology chapter does not quantify setting effects, cumulative visual intrusion, and non-physical impacts such as change to appreciation and experience of the ACA by visitors.

TDR impacts on unrecorded archaeology

The TDR (Appendix 2C) proposes temporary and permanent road accommodation works which will disturb ground across a wide linear corridor and carry a real risk to previously unrecorded archaeological deposits. The EIAR does not demonstrate a clear mitigation hierarchy (avoidance where possible), targeted trial trenching and contingency archaeological mitigation clauses. A watching brief approach is outlined which is not enforceable and therefore insufficient.

I respectfully request that An Coimisiún Pleanála refuse the applicants planning submission on that followings grounds:

- 1). The volume of recorded monuments in the 3km study area means the area is unsuitable for the proposed scale of this strategic infrastructure development
- 2). There are ten recorded monuments within the planning boundary however the applicant has not conclusively submitted any details around how these ten, monuments will be protected. Similarly, the applicant doesn't address any indirect effects on these ten monuments.
- 3). The Archaeology chapter does not quantify setting effects, cumulative visual intrusion, and non-physical impacts such as change to appreciation and experience of the Lough Gur ACA by visitors.
- 4). Potential for impact to previously unrecorded archaeological deposits.
- 5). The applicant does not include an underwater archaeology assessment as requested by The Department of Housing, Local Government and Heritage. This omission does not align with the Limerick Development Plan **Objective EH O38** - Preservation of the Underwater Archaeological Heritage It is an objective of the Council to seek the preservation (in situ, or at a minimum, preservation by record) of all known and all previously unrecorded sites and features of historical and archaeological record in wetland, riverine, lacustrine, estuarine and or marine environments.

6). The applicant submission does not align with **Objective EH O39** of the Limerick County Development Plan. The applicant has not demonstrated that the development shall not have a negative impact on the character or setting of an archaeological monument.

7.)The applicant submission does not align with the provisions of **Objective EH O50** of the Limerick County Development Plan in so far as it does not ensure that development proposals to Protected Structures, their curtilage and setting, shall have regard to the Architectural Heritage Protection Guidelines for Planning Authorities published by the Department of the Arts, Heritage and the Gaeltacht. It is an objective of the Council to “ensure that any development, modification, alteration, or extension affecting a Protected Structure **and/ or its setting**, is sensitively sited and designed and is appropriate in terms of the proposed scale, mass, height, density, layout and materials” and also that the “Protected Structure and any complex of adjoining buildings, designed landscape features, or views and vistas from within the grounds of the structure are respected”.

8) Turbine Delivery Route (TDR) — permanent and temporary works

Appendix 2C TDR Report (with some swept-path analysis) and traffic management appendices are included in the applicant EIAR .

I wish to note the following observations:

- The TDR and associated accommodation works have the potential to cause permanent loss of hedgerow, tree removal, altered junction geometry and bridge works. The applicant’s TDR report is present, but the EIAR does not provide fully engineered drawings, full structural assessments for bridges or legally binding reinstatement and biodiversity compensation commitments.
- Traffic & safety: Abnormal loads will travel lengthy rural routes — the Traffic Management Plan (Appendix 16A) is not fully developed with alternatives, emergency plans, and proof that local roads and bridges can safely carry the loads (including repeated transits during delivery).
- Absence of statutory approvals from Limerick City and County Council, ESB Networks and other utility providers for the accommodation works proposed along public roads and verges.
- Lack of structural assessments and certified load-capacity verification for bridges and culverts along the route, including Tullovin Bridge, contrary to TII guidance and standard local authority procedures for abnormal load movements.
- Incomplete swept-path analyses and inadequate detail at identified pinch points, leaving uncertainty as to whether turbine components can be safely transported without road widening or vegetation removal.
- Insufficient Water Framework Directive compliance evidence, with no detailed construction method statements for temporary crossings or silt-control measures at watercourses.
- Lack of coordination evidence with An Garda Síochána, emergency services and affected residents regarding temporary closures and convoy management.

These omissions mean that the feasibility and legality of the proposed delivery route have not been demonstrated, and the likely environmental and public-road impacts remain inadequately assessed. Accordingly, the application fails to comply with the requirements of the EIA Directive (2014/52/EU), Irish Roads Acts, and relevant Local Authority roads standards.

I respectfully request An Coimisiún Pleanála refuse:

- 1.) Final TDR engineering drawings, bridge assessments and detailed Construction Traffic Management Plan with independent verification have not been provided.
- 2.) The applicant has not submitted detailed structural assessments and certified load-capacity verification for bridges and culverts along the route.
- 3.) The applicant has not provided satisfactory evidence of binding reinstatement and habitat compensation plans.

9) Grid Connection Route

Appendix 2D Grid Connection Report advises the proposed grid connection route is 27.6km. 0.7km is along the N24 corridor/curtilage and 3.1km is along the wind farm internal access tracks, the remaining sections are within the carriageway of the public road consisting of the following:

- 2.5km along the L1170
- 13.4km along the R512
- 2.3km along the L1412
- 4.2km along the L8012
- 1.4km along the R512

At a total of almost 28km, this will be the second longest onshore underground grid connection from a windfarm in Ireland. Only Gousemount, with a grid connection route in an populated area straddling the Cork and Kerry border has a longer grid connection than the proposed development at 31.5km.

The Grid Connection Route Report scope advises that the report “*provides **high level details of the chosen route and describes the design of the Grid Connection Route***”.(1.2 Page 2 Appendix 2D) . It further advises the “**exact location of the underground HV ducting may be subject to minor modification following confirmatory site investigation**” (2.1 Page 4 Appendix 2D).

The project’s grid connection route is described by the applicant as approximately 27.6 km of underground cabling from the existing Killonan 220/110 kV substation to the proposed on-site substation for the wind farm. The grid connection route forms part of the planning application boundary yet circa 6km of the grid connection route is in an area zoned unsuitable for new wind energy development.

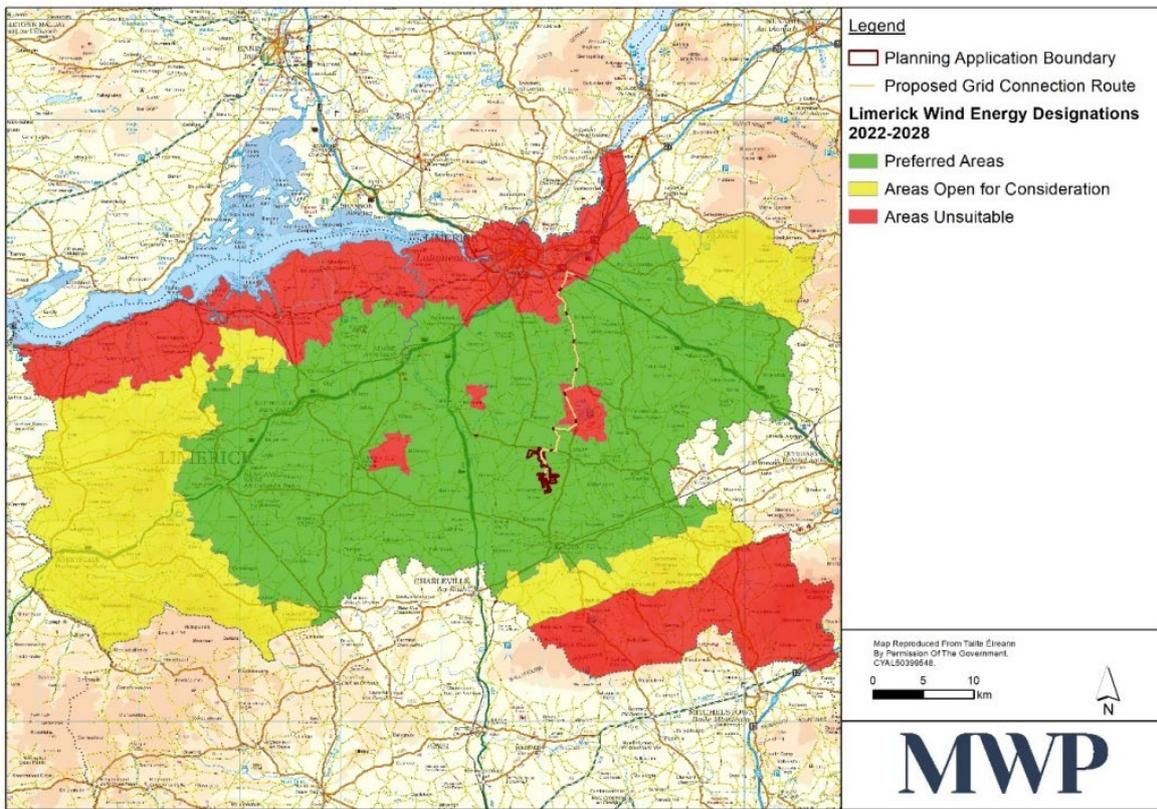
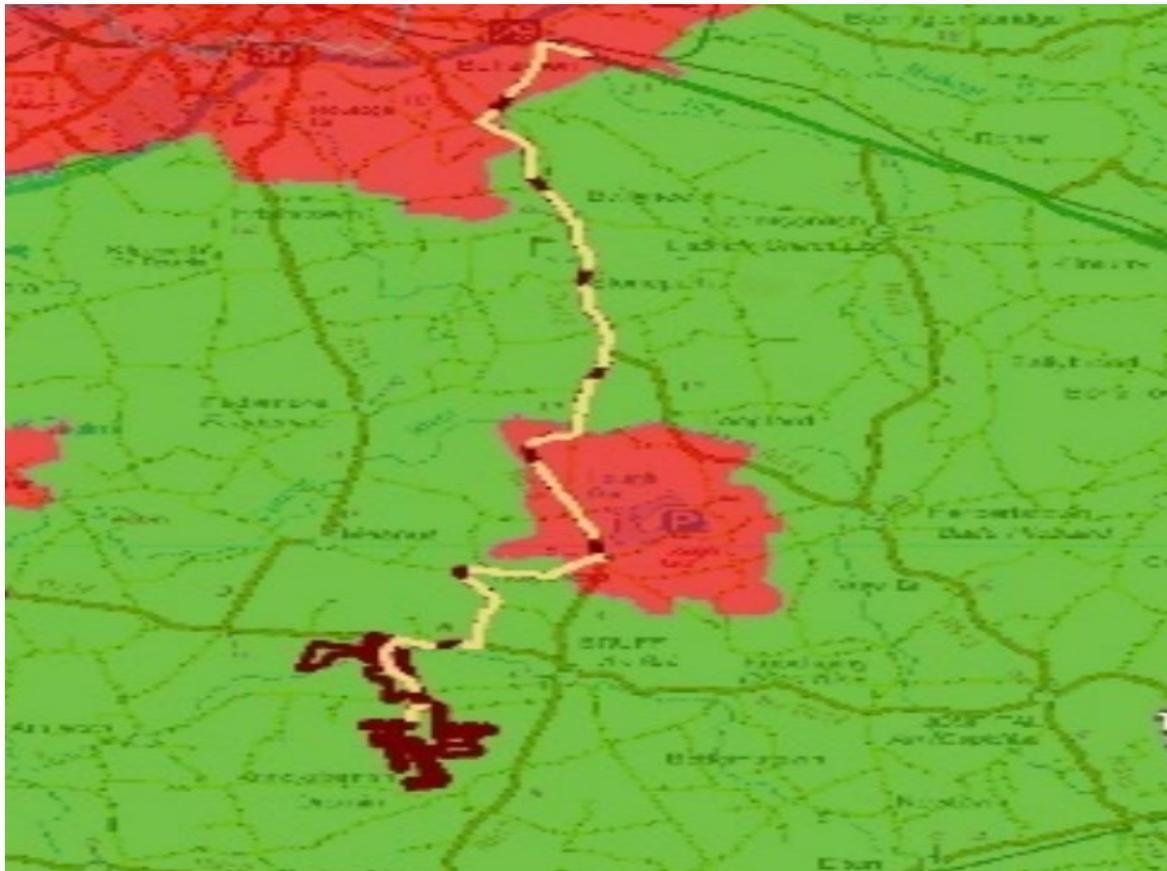


Figure 2-6: Wind Energy Zoning

Source: Applicant EIA Chapter 2 Figure 2-6



Source: Applicant EIA Chapter 2 Figure 2-6

I wish to bring to your attention, two separate and distinct areas, highlighted above, where the proposed GCR, lies in an area deemed ‘Unsuitable’ for wind energy generation.

This Planning Statement contains an internally inconsistent interpretation of the Limerick Development Plan 2022–2028 Wind Energy Strategy, particularly regarding the application of zoning designations to the grid connection element of the development.

This position seeks to exclude part of the GCR from the spatial policy framework that governs the siting of wind energy developments within the county.

Under Section 3 of the Planning and Development Act 2000 (as amended), “development” includes any works or use of land forming part of a single project. The current proposal is presented under one red-line boundary and assessed through a single EIAR. As such, it constitutes one development for planning purposes, comprising both generation and associated infrastructure.

The Wind Energy Development Guidelines (DEHLG 2006 and Draft 2019) explicitly define a wind energy development to include ancillary elements such as substations, access tracks and grid connections. Furthermore, in *O’Grianna & Ors v An Bord Pleanála* [2014] IEHC 632, the High Court held that a grid connection and its related turbines form a single project for both EIA and planning assessment.

Therefore, where an application is made for a wind farm and its grid connection as one project, the Development Plan’s zoning policies must be applied to the entire proposal, not selectively to its parts.

The Limerick Development Plan 2022–2028 identifies lands “Preferred for Wind Energy Development,” “Open for Consideration,” and “Unsuitable for New Wind Energy Development.” Approximately **6km (22%)** of the 27.6 km GCR traverses land zoned “*Unsuitable for New Wind Energy Development.*”

By asserting that the zoning does not apply to the grid connection, the applicant seeks to rely on the Development Plan for the main site’s policy support while disregarding it for the GCR elements. This approach undermines both the integrity of the Development Plan’s locational strategy and the principle of consistent spatial planning.

The Grid Connection Route Report states the route is subject “**to modification**” post planning and is based on “**high level details**”.

The applicant notes in 3.2 Page 27 Appendix 2D that feedback from Limerick City & County Council required additional site investigations were required, however only non-invasive surveys such as a Topo Survey and a GPRS are undertaken to inform the design of the grid connection cable route. Whilst the GCRR advises the applicant engaged with a number of Utility Companies, it is evident that the 27.6KM route has been selected and designed based on “*high level*” and preliminary investigations, which have significant potential to change post planning. There is no evidence of alternative routes being investigated in the event that the proposed route is not permissible. No independent Surface Water Management Plan has been considered for the grid connection route design. The grid connection route report concludes

that “a grid route design suitable for planning purposes has been developed” This proposed route is not finalised and is preliminary in nature, with the applicant further stating that “a detailed design of the grid route shall be developed”.

Construction details for the 27.6km grid connection route are based on Typical Details and are not specific construction details. The MWP Drawing 22635 MWP 00 00 DR C 5431 illustrates some typical details siting minimum dimensions and with “**reinstatement within public road to be agreed with the local authority**”. The grid connection route construction details are not designed, and it would appear the construction detail for same has not been fully agreed with the local authority.

Furthermore, the applicant has not demonstrated that they have engaged or sought necessary consent with residents and landowners along the proposed 27.6km route.

The proposed grid connection route runs alongside and in close proximity to a number of Proposed Natural Heritage Areas, Figure 2-12 Appendix 2D Page 21 refers. The effects on these Natural Heritage Areas cannot be adequately identified or mitigated against given the incomplete design.

The applicant planning statement advises that “**a c. 120m buffer corridor along the proposed grid route was archaeologically assessed to establish potential physical impacts to the national monuments and wider recorded monuments located in proximity to the proposed grid connection route**”. No details of this ‘assessment’ or what form it took are provided. Furthermore, it not clear if this ‘assessment’ applied to the full 26.7m proposed route.

The applicant advises there are “**six recorded monuments within the 120m wide assessment corridor of the proposed Grid Connection Route. Five of the six monuments are situated in the vicinity of the grid connection route and one (Bridge LI023- 063002) is located directly on the footprint of the proposed cable route. There are eight built heritage structures listed in the National Inventory of Architectural Heritage (NIAH) located in proximity to the proposed Grid Connection route. One of the structures (Sixmile Bridge) is a Recorded Protected Structure**”.

The applicant notes that potential physical impact to the Sixmile Bridge is classified as **significant** and in that context, horizontal directional drilling (HDD) will be undertaken to mitigate impacts. No specific details of the proposed mitigation are provided and therefore one cannot assume that the applicant’s mitigation measure will effectively mitigate the **significant** impact posed to this Recorded Protected Structure.

I respectfully request An Coimisiún Pleanála refuse the applicants planning application as follows:

- 1) Approximately **6km (22%)** of the 27.6 km GCR traverses land zoned “*Unsuitable for New Wind Energy Development.*” This inconsistency with the Limerick Development Plan 2022-2028 zoning seeks to exclude part of the GCR from the spatial policy framework that governs the siting of wind

energy developments within the County, and it undermines both the integrity of the Development Plan’s locational strategy and the principle of consistent spatial planning.

- 2) The Grid Connection Route is not designed and is subject to detailed design with “high level” details of the chosen route outlined. There is a lack of verifiable feasibility provided for the grid connection route, the exact location of the underground HV ducting may be subject to modification following confirmatory site investigations.
- 3) Typical construction details lacking site specific detail are submitted by the applicant.
- 4) No evidence of pre-application consultation with local authority roads department is submitted.
- 5) No evidence of consent from landowners along the grid connection route is presented by the applicant.
- 6) The potential physical impacts to the national monuments and wider recorded monuments located in proximity to the proposed grid connection route are not documented or adequately mitigated for in the applicant submission.

10) Permanent storage heaps (9 No.) — landscape, water and biodiversity implications

The applicant proposes 9 Nr permanent storage heaps and Appendix 4B addresses Material Volume Calculations. EIAR Volume 2, Chapter 4 Civil Engineering in 4.11 notes Deposition Areas, both temporary and permanent in nature are proposed.

The applicant’s statement in EIAR Volume 2, Chapter 4 (Section 4.11) that “**should any material be found to be contaminated, it will be transported offsite to an appropriately licenced facility**” is inadequate and non-compliant with established EPA and Waste Management requirements. No details are provided regarding how potential contamination will be identified, tested, classified, or tracked.

Under the Waste Management Act 1996 (as amended), the European Communities (Waste Directive) Regulations 2011 (S.I. 126/2011), and the EPA (2022) Guidelines for the Preparation of Construction and Demolition Waste Management Plans the applicant must outline a defined contaminated land management procedure. This should include:

- Soil sampling and laboratory testing in accordance with *BS 10175:2011+A2:2017* and EPA guidance.
- Classification of materials under the *European Waste Catalogue (EWC)* and assessment against *Waste Acceptance Criteria (WAC)*.
- Identification of licensed hauliers and EPA-licensed or permitted receiving facilities.
- Compliance with *Waste Collection Permit* and *ADR Regulations* for hazardous consignments.
- Use of EPA *Waste Transfer Forms (WTFS)* to ensure traceability.

The absence of such a methodology by the applicant leaves uncertainty as to how contaminated soil will be detected, how its transportation and disposal will be controlled, and how environmental protection will be ensured in compliance with national and EU law.

- Permanent landscape scarring & biodiversity loss: The proposal of nine separate permanent storage heaps is not justified as necessary and is highly likely to be visually intrusive and ecologically sterile without specific restoration and long-term management proposals. The EIAR must quantify footprint and visual/specific habitat loss for each individual spoil heap.
- Hydrology & water quality: Permanent spoil heaps risk altered run-off and sediment transport. While some drainage appendices exist (Appendix 4E etc.), there is insufficient, site-specific evidence that permanent heaps will not lead to increased sedimentation of downstream watercourses, nor that long-term stability is assured.

I respectfully request An Coimisiún Pleanála refuse the applicants planning application as follows:

- 1) The applicant does not provide full detailed engineering, landscape and biodiversity restoration plans. Generic, typical details are submitted.
- 2) The development as described would result in multiple on-site deposition areas and long-term storage of excavated materials. The Regional Waste Management Plan (2015–2021) and 2021 Evaluation Report requires C&D and other waste to be managed in line with circular-economy principles, strict C&D targets and with explicit consideration of the location criteria and capacity of disposal/recovery installations (S.I. No. 323/2020).
- 3) The EIAR/CEMP does not demonstrate that the proposed on-site deposition areas meet the RWMP evaluation requirements or that they will not operate as unauthorised or effectively permanent waste disposal/storage facilities.
- 4) The EIAR fails to demonstrate adherence to the *EIA Directive 2014/52/EU* requirement to assess and mitigate significant environmental effects, and this should be considered a material deficiency in the application.
- 5) In the absence of a full site-specific waste justification and evidence of compliance with the national/regional waste policy and legal requirements, the proposal is inconsistent with the Waste Management Plans evaluation and should be refused.

11) Cumulative effects (ecology, visual, noise & TDR interactions)

The applicant attempts to address cumulative effects of the proposed development with existing, proposed and permitted developments in the surrounding area (See Section 1.4.4 of Volume II, Chapter 01).

A list of significant planning applications has been included in Volume II, Chapter 01 Introduction of the EIAR. The applicant EIAR includes some cumulative assessments and notes nearby solar/wind plant projects in the vicinity.

The applicant's submission contains incomplete cumulative scope and scenarios. Cumulative assessment must include all consented, submitted and reasonably foreseeable

renewable energy developments (wind and solar plants) and model combined effects across disciplines (collision risk, ZTV cumulative skyline, combined noise exposure). The submitted applicant material reference nearby developments but do not present full scenario matrices with combined worst-case permutations.

The applicant has submitted an incomplete list of nearby renewable energy developments.

The applicant did not submit a comprehensive cumulative impact chapter that quantifies combined effects for ecology, visual amenity, noise, and transport/TDR interactions using robust, evidence-based scenarios.

The applicant includes in Figure 17-19 “Neighbouring Windfarms within 20km”

The applicants cumulative effect study appears to be limited to a 20km buffer zone and omits the following nearby operational windfarms:

Windfarm Name	No of Turbines	Capacity	Operational Status
Tournafulla	18	27MW	Operational
Dromada	19	28.5MW	Operational
Rathcahill	5	12.5MW	Operational
Knockastanna	4	6MW	Operational
Grouselodge	6	15MW	Operational

Furthermore, the applicant omits the proposed windfarm in the name of their sister Company Ballynisky Green Energy (Coolcappa area) in County Limerick. In addition, the existing Annagh Wind Farm (near Charlivelle, North Co. Cork) and further proposed wind plant developments at Grange, Creeves, Ballingarry and Knockaderry in Co. Limerick have not been detailed in the cumulative effects.

Whilst some of the wind plants I reference above exceed the applicants 20km study area these must be taken into account by the Inspector to adequately assess cumulative effect. The cumulative impact of the above noted wind plants has not been addressed adequately and by limiting their assessment to 20km the applicant has eliminated effect from a further 52 number (operational) and a further 6 (proposed) (Ballynisky) in addition to even further developments in earlier design development stages noted above.

The Ballinlee Green Energy application, together with Sister Applicants Garane Green Energy and Ballynisky Green Energy are proposing an influx of 32 industrial sized wind turbines across three wind plants in County Limerick **currently**. The effect of these additional 32 turbines means there will be an over-concentration of development in the area.

The above also only details effect of wind plant developments in isolation to other renewable energy projects in the area inclusive of solar farm and battery storage applications.

AA Assessment for Potential in-combination effects

The Appropriate Assessment states that **“apart from single-dwelling developments there are no projects that are within the 3km search radius for small projects, however, there are five projects that have been finalised and that occur within the same catchment, sub-catchment or sub-basin as the Proposed Development that have been included for assessment of potential in-combination effects. Refer to Table 5”**.

Project (Planning Reference)	Applicant	Brief Description	Location	Distance from the Development	Granted
Solar Farm System (19455)	Cappamore Kilmallock Area Planner	Construction of 114KWP solar farm system, underground cable, an inventor building and all site works	Garrooe, Bruree House, Bruree, Co. Limerick.	c. 15 km upstream of the Development via the River Maigue c. 6 km direct distance	2019
Farm Buildings (22457)	Fergal Hanrahan	Demolition of existing buildings and decommissioning of existing slurry storage. Construction of agricultural buildings	Coolboy, Athlacca, Co. Limerick	c. 3.7 km downstream of the Development	2022
Dwelling Houses (2360796)	OMC Houses	Construction of 5-dwelling houses, access off existing housing estate	The Grove, Bruff, Co. Limerick	c. 3.3 km upstream of the Development	2024
Bridge (218006)	-	Demolition of Ballysimon Bridge over the River Groody, and	Golf Links Road, Ballysimon, Ballysimon	c. 2 km downstream of the GCR via	2021
		construction of a new bridge.	(Staunton), Garryglass, Co. Limerick	the River Groody	
Substation (191250)	EirGrid plc, with the consent and approval of the ESB	Minor modifications to a previously permitted development. Extension of the existing Killonan 220/110 kV substation compound	Milltown and Coolyhenan, Co. Limerick	Located at the termination of the GCR	2020

The above table from the Appropriate Assessment omits a number of granted and constructed planning applications within 3km of the development since 2019.

Refer to **Appendix A** of this Submission for details of relevant planning applications (Dromin Athlacca) that are omitted from the applicant’s potential for in-combination effects.

I respectfully request that An Coimisiún Pleanála refuse the applicant planning application on the following basis:

- 1.) The applicant does not address true cumulative effects of the proposed development with existing, proposed and permitted developments in the surrounding area.
- 2.) Only existing (within 20km) and one proposed wind farm development (within 20km) are included, with no details of other proposed wind production facilities phases reported in,

Grange, Creeves and Ballingarry or other renewable energy projects (solar and battery storage projects) factored into the applicant's cumulative study.

- 3.) The Inspector must examine the true cumulative effect on the area by extending assessment beyond the 20KM zone given the scale of this SID application and also take future proposals into account. ABP-312461-22 – Ballyduff Wind Farm, reaffirms this.

12) Soils, Peat Soil and Soil Management

The EIAR acknowledges the presence of localised peat deposits within the proposed development site, with recorded depths of up to approximately 0.8 m. However, there appears to be no standalone Peat and Spoil Management Plan included in the planning submission, and the extent of peat probing across turbine locations, access tracks, and associated infrastructure is not clearly documented.

Given the environmental sensitivity and carbon implications of peat disturbance, a comprehensive PSMP should have been prepared and submitted by the applicant, in line with best practice. This should include detailed mapping of peat depths and volumes, clear proposals for excavation, handling, storage, reuse, and reinstatement of peat, and contingency measures for peat instability. The applicant should also provide full site-specific peat probing data, together with an updated carbon calculation that reflects the verified peat volumes and sensitivity analysis of potential variations in peat depth.

I respectfully request An Coimisiún Pleanála to refuse planning permission on the grounds that:

- 1) The EIAR notes no peat mapped on GSI maps but the ground investigations show local peat remnants. The applicant has not explained this variance or the rationale for relying on GSI mapping as opposed to trial pit data in their designs or in proposed mitigations.
- 2) The applicant has not submitted a standalone Peat and Spoil Management Plan in line with best practice.
- 3) Insufficient Peat probing coverage and sampling density undertaken by the applicant. The geotech report recorded peat at three trial pits. For robust peat volume and carbon loss estimates and for safe design of access tracks and foundations, best practice is targeted peat probing across all proposed infrastructure footprints, not just a few pits, especially where peat was found. The applicant submission fails to show that peat probing was targeted at each turbine, hardstand, borrow pit and critical track sections.
- 4) The peat carbon calculation is required to be fully transparent. The applicant submits a carbon calculation in EIAR Chapter 11 and Appendix 11A. The carbon appendix uses assumptions average depth, assumed carbon content, in their assessment. No site-specific inputs like exact peat volume per location were used and full carbon calculation outputs, by source, and sensitivity testing are documented.
- 5) The applicant doesn't address how peat derived runoff be prevented from entering watercourses.

- 6) Deeper peat depths are potentially present and there is potential for unmapped peat beyond the trial pits noted.

13) Emergency Access and Fire Safety Deficiencies

a) Absence of Fire-Fighting Water Supply and Fire Safety Infrastructure

The EIAR and accompanying planning documentation submitted for the proposed Ballinlee Wind Energy Plant fail to identify or describe any provision for water storage or water supply for fire-fighting purposes. No reference is made to a fire-fighting water tank, hydrant, standpipe, or other fixed or mobile water supply associated with the proposed site compound, temporary site offices, control building and 110 kV substation.

Given that the proposed development site is located in a remote rural area without access to a reticulated public mains water supply, the omission of a dedicated fire-fighting water source constitutes a significant deficiency in the application. In accordance with Schedule 7A, Part 1, paragraph 1(f) of the Planning and Development Regulations 2001 (as amended), a planning application for Strategic Infrastructure Development must include a description of “the infrastructure requirements of the project, including access arrangements, emergency access and transport routes.” Fire-fighting water storage forms an integral part of emergency response infrastructure and therefore should have been addressed within the EIAR and CEMP.

Furthermore, Technical Guidance Document B (Fire Safety) to the Building Regulations 1997–2024, Section 5.1, stipulates that access and facilities for the Fire Service shall be provided to enable effective fire-fighting operations. Where developments are remote from a public main, the National Directorate for Fire and Emergency Management (NDFEM) recommends provision of a dedicated or natural water source capable of supplying a minimum of 2,000 litres per minute for 45 minutes. Whilst TGD B, does not apply to wind turbines, it must apply to compounds, control offices and BESS.

In the absence of any such provision or consultation evidence with Limerick Fire and Rescue Service, it cannot be demonstrated that the proposed development complies with national fire safety standards or provides adequate emergency response infrastructure.

b) Inadequate Demonstration of Fire Tender and Emergency Vehicle Access

The submitted documentation for the proposed Ballinlee Wind Energy Plant, including the EIAR, CEMP, and Outline Traffic Management Plan, does not contain any dedicated fire tender access route drawings, swept-path analyses, or dimensional verification to confirm that standard emergency service vehicles can safely reach all turbines, the 110 kV substation, the control building, and the proposed permanent storage and construction areas.

While general site access and internal track layouts are described, and track widths of between 5.0 m and 6.0 m are indicated, these references relate primarily to turbine component delivery and construction logistics rather than to emergency vehicle access. There is no evidence that the proposed road alignments, turning heads, gradients, or

hardstand layouts have been tested against the operational envelope of a typical Limerick Fire and Rescue Service appliance.

This omission fails to demonstrate compliance with Schedule 7A, Part 1, paragraph 1(f) of the Planning and Development Regulations 2001 (as amended), which requires Strategic Infrastructure Development applications to include details of “emergency access and transport routes.” Furthermore, Technical Guidance Document B (Fire Safety) to the Building Regulations 1997–2024, Section 5.1, requires that suitable access routes and hardstanding’s be provided for fire appliances to within 45 m of any building to be protected.

Recent determinations by An Coimisiún Pleanála on comparable wind-energy Strategic Infrastructure Developments (e.g. ABP-303249-18 Grousemount, ABP-309119-21 Carrownagowan) have required that all site tracks and hardstands be constructed to a standard suitable for emergency and fire-tender access, to the satisfaction of the Fire Authority. The Ballinlee wind plant proposal lacks sufficient information to enable similar assurance.

I respectfully request An Coimisiún Pleanála refuse the applicants planning application on the following grounds:

- 1) The applicant failed to submit details confirming the location, capacity, and access arrangements for an adequate on-site fire-fighting water supply.
- 2) The applicant failed to submit a Fire Tender Access Plan, including a swept-path analysis for standard fire appliances, confirmation of minimum clear widths, bridge and culvert load-bearing capacities, and access-control arrangements, all which should have been agreed with Limerick Fire and Rescue Service prior to submission.

14) No Dedicated Invasive Species Management

The applicant in EIAR Volume III, Appendix 6I Habitat-and-Species-Management-Plan, in 5.6 Objective 6 Prevention of Invasive Species Spread acknowledge that “***Terrestrial non-native invasive species, which are listed on the 3rd schedule of the Habitats Regulations S.I. 477 of 2011, were recorded within the Development site. These include the high impact species Japanese knotweed (Reynoutria japonica) and medium impact species giant rhubarb (Gunnera manicata)***”.

Japanese Knotweed, which is a high impact invasive species has been detected and record as being present in two locations within the development site and planning application boundary and in very close proximity to proposed development and construction activity. (location 1 52.461869, -8.574126 and location 2 52.502840, - 8.574894). While management measures are referred to namely fencing, chemical treatment, and the licensed disposal of contaminated material the potential for inadvertent spread during construction, excavation, and soil transport remains a matter of serious concern. The applicant’s documentation expressly cautions against mechanical cutting due to the high propagation risk, yet it does not clearly demonstrate how compliance with these measures will be assured, monitored, or enforced throughout the project’s duration.

The applicant submission does not include a standalone, site-specific Invasive Species Management and Monitoring Plan (ISMP), and no Appendix 5 or equivalent detailed plan is provided.

This omission represents a significant deficiency in the application, as the management of invasive species is a legal and environmental requirement. The submission fails to:

- Identify the extent of infestations.
- Include detailed procedures for safe handling, containment, transport, and disposal of contaminated soil or plant material. 5.6.2.1 references chemical treatment however no site-specific plan is included. Chemical treatments are often a preferred option for treating Japanese Knotweed, but the process can take years before eradication can be guaranteed and requires post implementation monitoring. Given the nature of the proposed development, the use of chemical treatment alone is unlikely to be adequate unless treatment regime begins a number of years before construction commencement.
- Establish post-construction monitoring or reporting protocols to ensure eradication.
- Comply with RPO 127 of the Southern Regional Spatial and Economic Strategy (RSES, 2020–2032).

Without such a plan, the application does not demonstrate compliance with best practice guidelines (NPWS Code of Practice on Japanese Knotweed) and Policy Objective EH O11 of the Limerick Development Plan 2022-2028 Biodiversity Policies and Objectives which **requires the submission of a control and management program for the particular invasive species as part of the planning process, if developments are proposed on sites where invasive species are present**.

Winter heliotrope is identified and recorded in six different locations adjacent to the Grid Connection Route, the applicant advises ***“it is not anticipated that any activities will require its removal in these areas. Nevertheless, if works necessitate their removal, appropriate treatment and control measures will be implemented for this species and have been included in this plan as a precautionary measure”***.

The Grid Connection Route Report advises that the report *“provides **high level details** of the chosen route and describes the design of the Grid Connection Route”*.(1.2 Page 2 Appendix 2D) . It further advises the *“exact location of the underground HV ducting may be subject to minor modification following confirmatory site investigation”* (2.1 Page 4 Appendix 2D).

The applicant fails to satisfactorily provide a site-specific Invasive Species Management Plan, rather relies on assumptions that construction activity will not require removal in these areas along the Grid Connection Route.

An Coimisiún Pleanála should consider this a serious omission that the applicant should have addressed in their planning submission.

I respectfully request An Coimisiún Pleanála refuse planning permission.

15) Inadequate FRA

The applicant's Flood Risk Assessment (Appendix 9B), as referenced in EIAR Volume II, Chapter 9 Water, fail to meet the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities (DEHLG/OPW 2009) and associated OPW Technical Guidance Notes (2019–2024).

Development within Flood Zones A/B: Appendix 9B acknowledges that four turbines are located within Flood Zones A and B. However, the applicant has not carried out or presented a full Sequential and Justification Test in accordance with Section 5 of the 2009 Guidelines. No alternative siting or avoidance options are demonstrated, and the vulnerability classification of the proposed infrastructure has not been justified. As such, the proposal fails the sequential-avoidance principle fundamental to the national flood-risk management framework

Incomplete and Unverified Flood-Risk Data are provided in the applicant submission. While the Flood Risk Assessment uses FSU2 (2024) hydrology and HEC-RAS 1D/2D hydraulic modelling, it omits calibration, validation, and sensitivity analyses. Small tributaries (< 5 km²) are modelled using methods that the report itself identifies as unsuitable, creating potentially large flow-estimation errors.

Pluvial and groundwater flooding are dismissed without quantitative assessment and borrow-pit and deposition areas are not evaluated for potential impacts on flood-storage or conveyance capacity. Freeboard and finished-level data are provided only for the substation, not for turbines, transformers or access roads. These deficiencies contravene OPW modelling guidance and the 2009 Flood Risk Guidelines (paras 5.28–5.31)

I respectfully request An Coimisiún Pleanála must refuse on the basis:

1) Only a general outline of flood-risk analysis is provided by the applicant and significant gaps exist which prevent the Commission from being satisfied flood risk has been fully and reliably assessed.

2) At the time of writing (14th November 2025) the Morning Star River has burst its banks flooding the surrounding lands, an area known locally as the 'Corcas', this is after a couple of days heavy rain, a stark reminder that this flood plain is completely unsuitable for the proposed development.

3) The applicant has not justified the functional need to locate turbines in Flood Zones A/B, contrary to Section 5.28 of OPW/DEHLG (2009) Guidelines.

4) The applicant submission contravenes the Limerick County Development Plan in **Objective O1** Climate Action in Infrastructure Planning. It is an objective of the Council to require all infrastructure development, whether above ground or subterranean, to avoid flood risk areas.

5) Wetland 1: Located near Turbine 4, this groundwater-fed wetland is sensitive to changes in the water table. While mitigation measures like SuDS and raised turbine foundations are proposed, flood risk remains due to potential alterations in groundwater flow.

6)Wetland 2: This surface water wetland is situated near a proposed development access track. The proposed surface water management and erosion control measures do not demonstratively prove that they will effectively mitigate flood risks, resulting in a low residual risk and flood risk remains.

7)Wetland 3: As a peatland wetland within Flood Zone A, it is highly sensitive to hydrological changes. The applicant proposes protection protocols and construction restrictions to minimise flood impacts, but the residual risk remains high due to potential peat disturbance and water table changes.

8)Wetland 4: Adjacent to the substation site in Flood Zone C, this wetland is subject to seasonal flooding and the applicant's proposal to elevate infrastructure doesn't adequately manage flood risk.

16) Civil Engineering Chapter 4 EIAR

Chapter 4 Civil Engineering fails to provide the level of information required under the European Union (Environmental Impact Assessment) Regulations 2017 (as amended) and the Planning and Development Regulations 2001–2023. The civil engineering section is not a stand-alone, evidence-based assessment but rather a descriptive summary that defers essential detail to other volumes and appendices. It omits key baseline data such as peat depth mapping, geotechnical investigation results, groundwater levels, and surface-water catchment analysis—data that are fundamental to assessing the environmental effects of access roads, turbine foundations, borrow pits, and drainage works etc.

There is no presentation of feasible alternatives to the proposed civil layout or materials, contrary to Annex IV of the EIA Directive (2014/52/EU). The design of drainage and surface-water systems lacks quantitative modelling and does not demonstrate compliance with CIRIA C753 SuDS guidance, OPW flood-risk standards, or Inland Fisheries Ireland requirements. The proposed Morningstar River bridge crossing is presented without hydraulic modelling. Similarly, the borrow-pit and deposition-area designs are unsupported by hydrogeological assessment or groundwater protection measures, creating potential risks of sediment release and aquifer disturbance.

Mitigation measures are generic, unquantified, and not linked to monitoring or accountability, while the decommissioning section provides no plan for foundation removal, drainage restoration, or financial guarantee to secure reinstatement. Assertions of compliance with TII, EPA, and EirGrid standards are made without evidential demonstration or supporting calculations. In combination, these deficiencies render the chapter insufficient for the competent authority to conclude that significant adverse environmental effects have been properly assessed or mitigated.

17). Landowner Consent Letters

Article 22(2)(g) of the Planning and Development Regulations 2001 (as amended) states that

Where the applicant is not the legal owner of the land or structure concerned, the application shall be accompanied by the written consent of the owner to make the application.

Consent letters for Folio No. LK 3157F and Folio No. LK 10398 are signed by the person beneficially entitled to be owner. This is in contradiction to the requirement of Article 22(2)(g) of the Planning and Development Regulations 2001 (as amended).

Consent letter for Folio LK 51699F and 1539F is signed by a third party on behalf of the landowner. This is in contradiction to the requirement of Article 22(2)(g) of the Planning and Development Regulations 2001 (as amended).

Consent letters from adjoining landowners where the location of a turbine is less than two rotor blades from their boundary have not been submitted by the applicant. (Refer to Section 2 of this submission for further details).

It should be noted that the proposed grid connection route for the Ballinlee Wind Farm traverses or adjoins lands in private ownership, including road verges and boundary areas held by adjoining landholders. Under long-established Irish legal principles — *ad medium filum viae* (to the centre of the road) adjoining property owners are presumed to own to the centre line of the road unless expressly stated otherwise in their deeds. On this basis, sections of the proposed grid connection route encompass privately owned verges and boundary strips. No consent details have been submitted by the affected landowners for any disturbance, excavation, or access works on their property. Any such interference would constitute an unauthorised encroachment and a breach of private property rights. This matter requires full and careful consideration by An Coimisiún Pleanála before any decision is made.

I respectfully request An Coimisiún Pleanála refuse planning on grounds that :

1.)The applicant has not satisfactorily addressed proper legal owner consent and consent must come from someone entitled in law, not merely an occupier or beneficial holder. O’Connell v Dún Laoghaire–Rathdown County Council [2007] IEHC 490 and McCoy v Shillelagh Quarries Ltd [2015] IEHC 838 reaffirm this position.

2.) Consent letters from adjoining landowners where turbines are proposed less than 2 x rotor blades have not been submitted.

3.) The applicant has not satisfactorily addressed wayleaves, easements or rights of way that exist, landowner consent letters should state that the owner consents to the use or extension of that right for the proposed development.

4.)The applicant has not submitted details of consent from adjoining property owners who are presumed to own to the centre line of the road along the proposed grid connection route. Any interference with these lands, including trenching, cabling, or access works, would therefore constitute an unauthorised encroachment and a direct infringement of private property rights.

18). Applicant CEMP is insufficiently complete

The applicant CEMP submitted with the application fails to meet the minimum standards and level of prescription required for a Strategic Infrastructure Development under Irish and EU environmental planning guidance. The document titled *Construction Environmental Management Plan* (Appendix 2A of the EIAR) is presented as an “outline CEMP” and defers numerous essential details to a future, post-consent stage. Repeated references state that key management plans, monitoring programmes and emergency procedures “will be finalised by the appointed contractor.” This approach is contrary to the requirements for SID applications, which demand that all significant environmental mitigation and control measures be clearly defined, fixed, and capable of assessment prior to consent.

The submitted CEMP fails to comply with the minimum expectations set out in the following:

- EPA Guidance on the Preparation of Environmental Management Plans (2022).
- An Bord Pleanála Guidelines for Strategic Infrastructure Developments.
- Department of Housing, Local Government and Heritage – Guidance for EIARs (2021).

The Emergency Response Plan is not provided and is deferred to the contractor, contrary to the requirement that spill response, contact lists and statutory notification triggers be defined at the application stage. Monitoring programmes for water, noise, dust, vibration and ecology are incomplete, lacking quantitative trigger thresholds and corrective action protocols. Roles and responsibilities are not fixed, with no named Environmental Manager, independent auditor or reporting hierarchy to the Planning Authority. The Borrow Pit Blasting Methodology is not provided, despite the CEMP acknowledging the **potential for blasting**. The Traffic Management Plan, Habitat and Species Management Plan, and Whooper Swan Management Plan are merely referenced but not fully incorporated or bound within the CEMP. The document is expressly labelled as an “outline CEMP”, confirming that it is not the final enforceable version required at SID determination stage.

This lack of specificity contravenes the Environmental Impact Assessment Directive (2014/52/EU) and the Planning and Development Act 2000 (as amended), **both of which require that significant environmental mitigation be fully described and capable of verification before consent is granted.**

I respectfully request An Coimisiún Pleanála refuse planning on the following grounds:

- The CEMP does not meet the minimum requirements for a Strategic Infrastructure Development application, and it does not facilitate assessment of environmental effects due to lack of specificity.

- The applicant CEMP does not comply with the EPA (2022) Guidance on the preparation of Environmental Management Plans Section 3.2 – Mitigation Specification.
- A Borrow Pit and Blasting Management Plan with clear vibration and groundwater safeguards has not been detailed and provided. The CEMP acknowledges that rock blasting “may be required.” No Borrow Pit Management Plan has been submitted.
- No detailed method statements, blasting procedures, vibration limits, groundwater protection measures, or restoration proposals submitted. This omission is inconsistent with the standards required for a Strategic Infrastructure Development.
- Blasting is referenced in the CEMP but not assessed in the EIAR’s noise or vibration chapters.
- Detailed monitoring thresholds and corrective actions for all environmental media are not quantified.
- The CEMP does not address integration and binding of the Traffic, Habitat, and Whooper Swan Management Plans .

19). Stakeholder Consultation & Prescribed Bodies

The applicant does not include an underwater archaeology assessment. The Department of Housing, Local Government and Heritage (DHLGH) has requested such an assessment in **Appendix 1B** of the planning application. However, the EIAR does not specifically address this recommendation. The DHLGH, notes given the proximity of the development to watercourses, it would be prudent for the applicant to conduct an underwater archaeology assessment to ensure compliance with best practices and statutory requirements. This assessment should include both documentary research and fieldwork, as outlined by the National Monuments Service opr.ie. The applicant failed to address the DHLGH request in their application.

I note from the ABP Inspector Report (ABP-320745-24) in Page 14, 8.3.11, that “**The nearest of the proposed turbines would be approximately 9km from the administrative boundary with Cork County Council and 11 km from the administrative boundary with Tipperary County Council**” however in Appendix A on Page 17 of the same report only Tipperary County Council is listed as a prescribed body considered relevant for the purposes of the Ballinlee Wind Power Plant and section 37E(3)(c) of the Act of 2000. Cork County Council, being within circa 9km from the proposed development was not included in the list of prescribed bodies notwithstanding the proposed development is closer to the administrative boundary of the Cork local authority than it is to Tipperary County Council. I believe that Cork County Council, in addition to Tipperary County Council should be added to the list of prescribed bodies.

20). Inadequate Public Consultation Process

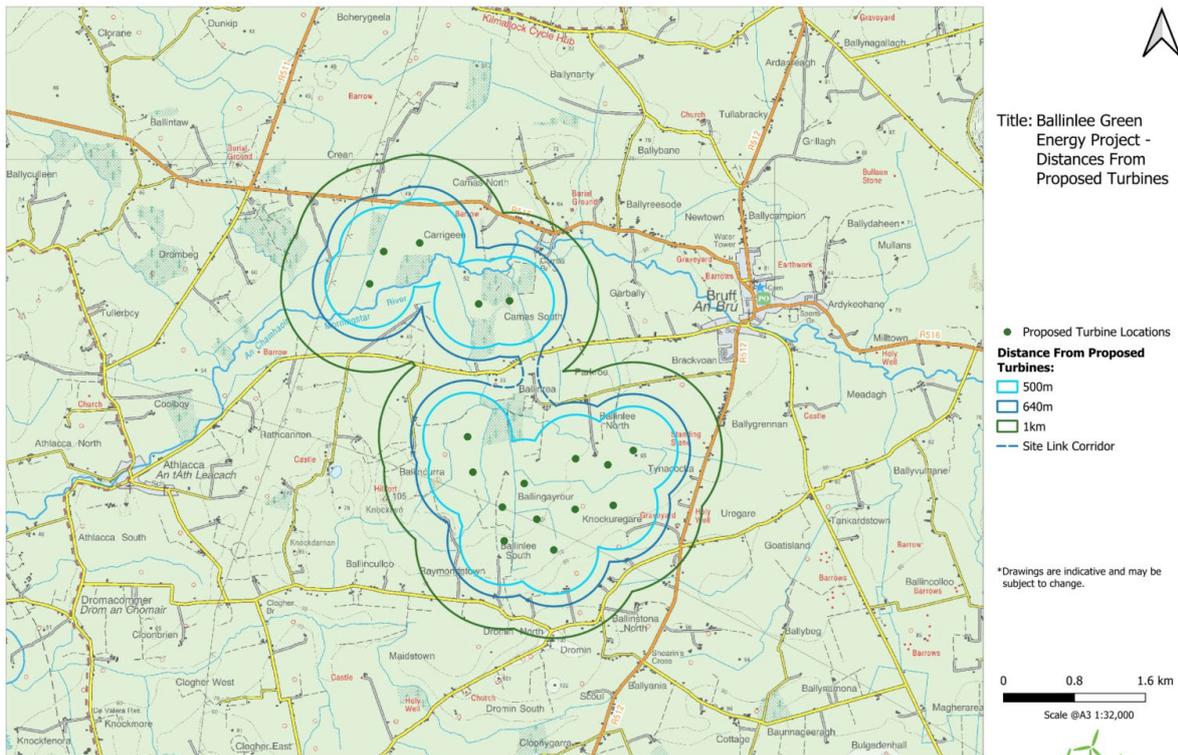
I have both arranged and attended public consultations for planning, both statutory and non-statutory in nature. The public consultation process run by Ballinlee Green Energy for the proposed Ballinlee wind plant falls short of the requirements expected of a robust public engagement process.

The applicant states in Appendix 1C Community Engagement Report “Door-to-door visits to all residents within 1km of the project” took place 17th – 19th June 2025. **I wish to categorically state that despite living within 1km of the proposed wind plant (within 1km of number of turbines)** there is no record or evidence of consultation with my household despite its inclusion within the 1 km engagement zone. Despite numerous requests for the applicant to follow through on this “statement” nobody ever called to my house. When I queried this with the applicant, they firstly advised they called in April despite advising the process was only commencing in June. When this was queried, no response was received. Excuses like the presence of large dogs being present were given. **I wish to categorically state I do not nor have in the past have any dogs at my property, or any other pets or animals for the record.** When the applicant both failed to fully address my queries and call to my property, I further followed up regarding the in-person clinic organised locally. I received a letter dated ‘August’ the last week of August advising that in-person clinics were to take place. When I tried to apply for an appointment the link provided did not work despite numerous attempts to use this link to book an in-person appointment. I also called the contact no. given to no avail. I was eventually given an appointment for a ‘virtual consultation’ for the 30th September 2025, the day after the planning application was submitted to An Coimisiún Pleanála.

I attached in **Appendix B** my correspondence with the applicant in this regard.

Appendix 1C Community Engagement Page 18 notes “***On the 30th of May 2025, letters and leaflets were posted to all houses within 1 kilometre of the project. Both the letter and the leaflet outlined the key details of the project, specifically the project location, benefits and the community benefit fund, as well as offering further consultation to the community.***” This letter did not identify the location of the proposed turbines rather named the townlands within the application area. Residents and property owners could not determine where the proposed turbines were located etc, distance from their homes etc, despite the applicant having completed their designs this information was withheld until much later in the process.

Subsequently, (end of July) the applicant released their “proposed turbine layout”, a series of dots plotted on an interactive area map, again leaving local residents in the dark as to exact locations, distances to dwellings etc.



Source: 'Proposed Turbine Layout' released by applicant July 2025 on www.ballinleegreenenergy.ie

On numerous occasions, I queried the distance from my property to the nearest turbine(s). The applicant advised that the nearest turbine is in excess of 760m from my home, however they are using co-ordinates at the ridge of my house, not the curtilage of my site, the difference is 72m. This is misleading and has consequences for implications on noise and shadow flicker analysis for my home.

Both Irish and EU legal frameworks underpin the requirement for public engagement, specifically the following for an SID:

Planning and Development Act 2000 (as amended) Sections 37A–37J deal specifically with Strategic Infrastructure Developments (SIDs). These provisions establish procedures including public participation.

Planning and Development Regulations 2001–2024 Regulation 289 outlines requirements for *public consultation notices* in SID applications.

EU Directive 2011/92/EU (as amended by 2014/52/EU) — *EIA Directive*

- Requires early and effective public participation before development consent is granted.
- Ensures that decision-making takes into account *public observations*

Aarhus Convention (1998) (ratified by Ireland in 2012)

- Guarantees three pillars of environmental governance:
 1. **Access to information,**
 2. **Public participation in decision-making,** and
 3. **Access to justice** in environmental matters.

I respectfully request An Coimisiún Pleanála refuse planning on the following grounds:

1).Ballinlee Green Energy Limited failed to adequately engage with local residents. The number of houses noted as being 1km from the proposed development is incorrect.

2.) The applicant does not demonstrate engagement with communities living and working along the Turbine Delivery Route and the Grid Connection Route.

3).The applicant failed to meet with the requirements of relevant Irish and EU planning Law with regards to public engagement requirements for an SID.

4).The applicant fails to demonstrate engagement with local community stakeholders, schools, pre-schools, local organisations, noting they identified and researched them but they provide any evidence that engagement took place.

5). The community engagement materials appear to rely heavily on online content (website and digital materials). There is limited evidence of meaningful in-person engagement accessible to all demographics, or clear evidence that issues raised in consultation materially changed design. The appended consultation/response document must be transparent about issues raised, dates of engagement, how feedback was addressed, and whether any changes to the scheme occurred because of it.

21) Personal Situation

I grew up in Raymondstown, Dromin and continue to live here with my own family. My home was built in 2010 with the intention of providing a safe and peaceful environment for my children, near my extended family and elderly parents who live next-door. Generations of my father's family have resided in Raymondstown. I love where I live, and I am proud of our local heritage and sense of community.

The proposed development threatens the quality of life we have built and the rural character of the area that generations of my family have called home.

The development would introduce constant noise (construction and operation), low-frequency vibration, and shadow flicker to an area that is currently quiet and rural. Numerous studies, and the experience of other rural communities, indicate that wind turbines can cause:

- **Sleep disturbance** and stress-related health impacts from low-frequency and amplitude-modulated noise.
- **Visual intrusion and shadow flicker**, which can cause anxiety, headaches, and reduced wellbeing.

The applicant's EIAR does not adequately address these human health effects or assess the cumulative burden for families living within close proximity to multiple turbines.

Given the scale and height of the proposed turbines, the impact will be significant, continuous, and unavoidable for residents like me and my neighbours in Dromin Athlacca and Bruff.

The development would severely diminish the residential and landscape amenity of our area. The rural setting, open views, and tranquillity are intrinsic to the value of our homes. It is well established that proximity to large-scale wind turbines can reduce property values, particularly where visual and noise impacts are high. Homeowners should not be expected to absorb such financial losses as a result of an industrial-scale energy project imposed within a settled rural community.

The CERIS (Centre for Economic Research on Inclusivity and Sustainability) Working Paper Series 2023/01 "Wind Turbines and House Prices Along the West of Ireland: A Hedonic Pricing Approach" concludes that "**a strong, significant, negative price effect of -14.7% on houses within 0-1km of a wind turbine**"

<https://www.universityofgalway.ie/media/researchsites/ceris/files/WP-2023-01.pdf>

Residents in Dromin reasonably fear that the presence of 17 turbines will sterilise the local area from future rural housing permissions and small-scale developments. The introduction of such an extensive energy infrastructure would alter how the planning authority assesses all future applications, effectively preventing young people—such as my own children—from building in their home place in years to come. This directly undermines rural settlement policy and the right of local families to continue living and contributing to their community.

As a parent, I am deeply concerned about the long-term effects of this development on my children's wellbeing and sense of safety. The turbines would dominate the local skyline, creating a constant physical and psychological presence.

My elderly parents, who have lived here all their lives, would be subjected to visual intrusion, flicker, and noise disturbance, which could have adverse health consequences given their age, their existing medical conditions and vulnerability.

The proposal conflicts with key principles of proper planning and sustainable development, including:

- **Protection of residential amenity** (Limerick County Development Plan 2022–2028, Objective EN 03 and Objective EN 04).
- **Safeguarding human health** and ensuring developments do not cause significant nuisance or material detriment to neighbouring properties.
- **Promotion of balanced rural development** that maintains population and family continuity in rural areas.

The proposed 17 turbine wind power plant, by its industrial scale, visual dominance, and proximity to dwellings, is inconsistent with these objectives.

I wish to state this submission is not anti-wind or anti renewable energy. I recently attended the Energy in the Estuary 2025 — Port to Power Summit, where leaders from Government, industry and international partners convened to explore how the Shannon Estuary and Irelands West Coast can power Irelands clean energy future. This enormous opportunity is just waiting to be explored and offers a far more sustainable solution to delivering clean energy than onshore in close proximity to settled residential communities.

Conclusion

Summary of Material Deficiencies and Non-Compliance:

- 1. Material Contravention of National and Regional Policy**
The proposal conflicts with the **National Planning Framework (NPO 23, 27, 60, 62)**, **National Landscape Strategy**, **Climate Action Plan 2024**, **National Biodiversity Action Plan 2023–2030**, and the **Southern Regional Spatial and Economic Strategy (RPO 131)** by failing to protect landscape character, biodiversity, and residential amenity.
- 2. Non-Compliance with Wind Energy Development Guidelines (2006 & Draft 2019)**
Nine turbines are located within less than two rotor-blade lengths of adjoining land boundaries. No written consents were provided from the affected landowners, contrary to both sets of Guidelines and Article 22(2)(g) of the Planning and Development Regulations.
- 3. Inadequate Ecological and Ornithological Baseline**
Survey coverage is incomplete, omitting nocturnal and full-season data, and fails to model cumulative collision risk, contrary to EPA (2022) and CIEEM (2018) guidance. No legally binding Biodiversity Net Gain or long-term monitoring plan is presented.
- 4. Landscape and Visual Impact Assessment (LVIA) Deficiencies**
Sensitive receptors such as **Lough Gur ACA**, **Ballyhouras** and nearby Protected Structures were inadequately assessed. Photomontages omit key viewpoints, leaf-off conditions, and cumulative skyline effects, breaching **EPA (2022)** EIAR Guidelines and **LCCC Development Plan 2022–2028** objectives.
- 5. Noise, Low-Frequency, and Amplitude Modulation (AM)**
Reliance on “financially involved” noise allowances masks exceedances. AM and tonal noise are not proactively managed, and no legally enforceable curtailment protocol is provided, contrary to **END Directive 2002/49/EC** and **RPO 131** of the RSES.
- 6. Shadow Flicker and Population / Human Health**
Assessment omits several dwellings and sensitive receptors (including the Bruff Temporary Accommodation Centre). The mitigation method is speculative and non-enforceable, failing to meet Draft Revised Guidelines (2019) zero-flicker standards.
- 7. Cultural Heritage and Archaeology**
Over 340 recorded monuments within 3 km—including a c. 1800 thatched cottage (RPS Structure 34)—would experience unacceptable setting impacts. No protection measures are detailed for 10 monuments within the site. The **Department of Heritage** request for an underwater archaeology assessment was ignored.
- 8. Turbine Delivery Route (TDR) and Grid Connection Deficiencies**
No certified bridge-capacity assessments, detailed engineering drawings, or

reinstatement commitments were provided. The 27.6 km grid route is preliminary only and lacks full site investigation, public consultation, and surface-water or archaeological mitigation.

9. **Peat, Spoil and Waste Management**

No standalone **Peat and Spoil Management Plan** or waste traceability procedure was submitted, contrary to the **Waste Management Act 1996, S.I. 126/2011**, and **EPA 2021 Code of Practice**. Permanent storage heaps are unjustified and risk water-quality deterioration.

10. **Fire Safety and Emergency Access**

No dedicated fire-fighting water supply, hydrant, or tender-access plan provided, contrary to **Schedule 7A Part 1(f)** of the Planning and Development Regulations and **TGD B (2024)** requirements for emergency facilities.

11. **Invasive Species (Japanese Knotweed & Gunnera)**

Infestations recorded but no **Site-Specific Invasive Species Management Plan** submitted, breaching **RPO 127 of the RSES** and **Policy EH O11 of the LCCC Development Plan 2022–2028**.

12. **Flood Risk Assessment Deficiencies**

Four turbines located in Flood Zones A/B without a **Sequential and Justification Test**. Hydraulic models lack calibration and omit borrow-pit, wetland, and groundwater risks, contrary to **OPW/DEHLG (2009)** Guidelines.

13. **Insufficient CEMP and Borrow-Pit Management**

The submitted **Outline CEMP** defers essential mitigation and monitoring to post-consent stage, contrary to the **EIA Directive 2014/52/EU** and **EPA (2022)** EMP Guidance. No Borrow Pit Management Plan, vibration or groundwater protection measures included.

14. **Defective Landowner Consents**

Several consent letters signed by persons not legally entitled as owners; adjoining-boundary consents absent.

For the reasons outlined above, I strongly object to the proposed Ballinlee Wind Power Plant.

This project would permanently alter the rural character of the area, expose residents to health and amenity risks, devalue our homes, and endanger the long-term sustainability of our community. For the reasons outlined the applicant fails to adequately submit a planning application for a Strategic Infrastructure to enable the An Coimisiún Pleanála Inspector to approve same.

I respectfully request that An Coimisiún Pleanála refuse permission for this development.

Thank you for taking the time to review my submission. Appropriate fee enclosed.

Kind regards,



Sinéad Ryan

B.Sc (Hons) MRICS, MSCSI

Appendix A – Granted Planning Applications since 2019

File Number	Application Status	Decision Due Date	Decision Date	Decision Code	Received Date	Applicant Name	Development Address	Development Description	Local Authority Name
2461127	APPLICATION FINALISED	17/04/2025	15/04/2025	CONDITIONAL	15/11/2024	Tom O'Donnell	Peafield House, Clogher East, Dromin, Kilmallock, Co. Limerick	extension to dwelling house and all associated development works...	Limerick Local Authorities
25187	APPLICATION FINALISED	06/08/2025	05/08/2025	CONDITIONAL	12/06/2025	Donal Mullins	Ballinlee South, Dromin, Kilmallock, Co. Limerick.	demolition of part of existing cattle housing and replace with slatted cattle unit on the same foot ...	Limerick Local Authorities
2561017	NEW APPLICATION	30/11/2025			06/10/2025	Roisin Henley	Dromin North , Dromin Kilmallock Co. Limerick	revisions to a single dwelling permitted under planning ref. no. 21/1401 as follows: (1) Revised Gar...	Limerick Local Authorities
2460844	APPLICATION FINALISED	26/11/2024	26/11/2024	CONDITIONAL	22/08/2024	Willie Mullins	Raymondstown Dromin Kilmallock Co. Limerick	a vehicular entrance off existing private passageway, the renovation of and construction of an exte...	Limerick Local Authorities
2360027	APPLICATION FINALISED	21/03/2023	21/03/2023	CONDITIONAL	25/01/2023	Philip Mullins	Ballinlee South, Dromin Kilmallock	a change of house type & garage type under previously permitted governing planning permission refere...	Limerick Local Authorities
19134	APPLICATION FINALISED	20/05/2019	15/05/2019	CONDITIONAL	15/02/2019	Caoimhe Coughlan & Michael Cronin	Ballingayrou, Dromin, Kilmallock, Co. Limerick.	a new dwelling, garage, wastewater treatment system, entrance and associated works...	Limerick Local Authorities
211401	APPLICATION FINALISED	15/03/2022	09/03/2022	CONDITIONAL	08/10/2021	Roisin Henley	Dromin North, Dromin, Kilmallock Co. Limerick	construction of a new dwelling, garage, wastewater treatment system, polishing filter, entrance and ...	Limerick Local Authorities
20736	APPLICATION FINALISED	23/09/2020	17/09/2020	CONDITIONAL	30/07/2020	Jennifer Daly & Seán Upton	Brackvoan Athlacc Road Bruff, Co. Limerick	the demolition of existing former dwelling house, construction of a new two storey dwelling house, d...	Limerick Local Authorities
211513	APPLICATION FINALISED	14/02/2022	11/02/2022	CONDITIONAL	29/10/2021	Victor Hannon & Zara Jones	Rathcannon, Athlacc, Kilmallock Co. Limerick	construction of a dwelling house, garage, entrance, wastewater treatment system, percolation area an...	Limerick Local Authorities
21113	APPLICATION FINALISED	14/07/2021	13/07/2021	CONDITIONAL	05/02/2021	Niall & Jackie Burchill	Clogher East Athlacc Kilmallock, Co. Limerick	construction of a dwelling house, garage, entrance, proprietary waste water treatment system, percol...	Limerick Local Authorities
211813	APPLICATION FINALISED	17/04/2022	07/04/2022	CONDITIONAL	22/12/2021	Patrick Murphy	Athlacc North, Athlacc, Co. Limerick	the construction of a dwelling house, detached domestic garage, new entrance and entrance walls, the...	Limerick Local Authorities
21571	APPLICATION FINALISED	08/12/2021	08/12/2021	CONDITIONAL	30/04/2021	Jason Lenihan & Lisa Murphy	Clogher East Athlacc Kilmallock, Co. Limerick	construction of a single storey dwelling house, garage, entrance, proprietary waste water treatment ...	Limerick Local Authorities
22156	APPLICATION FINALISED	06/11/2022	03/11/2022	CONDITIONAL	14/02/2022	Michael Coleman	Crean Athlacc Kilmallock, Co. Limerick	conversion of existing agricultural building to domestic house to include modification and alteratio...	Limerick Local Authorities
229	APPLICATION FINALISED	02/03/2023	05/08/2022	CONDITIONAL	07/01/2022	Edmund & Sarah Finn	Athlacc South Kilmallock Co. Limerick	construction of a dwelling house, garage, entrance, wastewater treatment system, percolation area an...	Limerick Local Authorities
23312	APPLICATION FINALISED	03/10/2023	29/09/2023	CONDITIONAL	13/06/2023	Cian & Sasha McAuliffe	Drombeg Athlacc Kilmallock Co. Limerick	the construction of an extension of dwelling house, construction of a new driveway, installation of ...	Limerick Local Authorities
2360832	APPLICATION FINALISED	21/02/2024	20/02/2024	CONDITIONAL	16/11/2023	Caroline Clifford	Rathcannon Athlacc Co. Limerick	the construction of an entrance, dwelling house, garage, domestic waste water treatment system & po...	Limerick Local Authorities
2360964	APPLICATION FINALISED	24/02/2024	21/02/2024	CONDITIONAL	22/12/2023	Shanie Ryan & Robbie Moloney	Rathcannon Athlacc Co. Limerick V35 TF66	demolition of existing storage shed & rear extension to dwelling house, construction of two storey e...	Limerick Local Authorities

Appendix A – Granted Planning Applications since 2019

2460247	APPLICATION FINALISED	08/07/2024	03/07/2024	CONDITIONAL	22/03/2024	John Fitzgibbon	Drombeg Athlacc Co. Limerick	an extension to the rear of a dwelling house and a detached garage which are currently under constru...	Limerick Local Authorities
2497	APPLICATION FINALISED	09/09/2024	03/09/2024	CONDITIONAL	19/03/2024	Lacknagrour Farm Ltd.	Rathcannon Athlacc Co. Limerick	a slatted shed comprising of an underground slurry storage tank, shed and easi feed passage...	Limerick Local Authorities
25121	APPLICATION FINALISED	17/08/2025	14/08/2025	CONDITIONAL	15/04/2025	Niamh & Michael O'Donnell	Ballinculloo, Athlacc, Co. Limerick.	a dormer dwelling, a wastewater treatment system, a new entrance, modification to existing ruin to b...	Limerick Local Authorities
25259	APPLICATION FINALISED	23/09/2025	18/09/2025	CONDITIONAL	30/07/2025	Brian Higgins	Rathcannon, Athlacc, Kilmallock, Co. Limerick	a cattle shed with slatted tank and permission to construct a straw storage shed, silage slab with e...	Limerick Local Authorities
24390	APPLICATION FINALISED	19/03/2025	18/03/2025	CONDITIONAL	09/10/2024	Shane Rabbitt	Ballintaw, Athlacc, Kilmallock, Co. Limerick.	a dwelling house serviced with a mechanical wastewater treatment unit, construct entrance from publi...	Limerick Local Authorities
24449	APPLICATION FINALISED	04/02/2025	31/01/2025	CONDITIONAL	02/12/2024	Elen O'Regan & Donal Barry	Rathcannon Td., Athlacc, Kilmallock, Co. Limerick.	the construction of a two-storey dwelling, effluent treatment system and soil polishing filter, bore...	Limerick Local Authorities
24481	APPLICATION FINALISED	25/02/2025	25/02/2025	CONDITIONAL	23/12/2024	Denis Lynch	Cloonbrien Td Athlacc Co Limerick	a) construction of front porch (change of plan) and conversion of attic space for domestic storage t...	Limerick Local Authorities
22443	APPLICATION FINALISED	14/07/2022	29/06/2022	CONDITIONAL	20/04/2022	John Lynch & Mary O'Rourke	Glenma Athlacc Co. Limerick	the construction of a dwelling house, garage, entrance, wastewater treatment system, percolation are...	Limerick Local Authorities
191278	APPLICATION FINALISED	30/03/2020	24/03/2020	CONDITIONAL	20/12/2019	Michael Carmody	Rathcannon, Athlacc, Kilmallock, Co. Limerick.	the construction of a 772 sq.m steel frame agricultural wintering facility above a pre-existing rein...	Limerick Local Authorities
1936	APPLICATION FINALISED	09/07/2019	05/07/2019	CONDITIONAL	21/01/2019	Ann Marie Hayes & Kieran Murphy	Crean, Athlacc, Co. Limerick.	a dwelling house, garage, install a new septic tank and percolation area, driveway entrance and all ...	Limerick Local Authorities
20421	APPLICATION FINALISED	16/07/2022	11/12/2020	CONDITIONAL	27/05/2020	Laura Moloney & William Meade	Coolboy Athlacc Kilmallock Co. Limerick	construction of a four bedroom two storey dwelling house, detached domestic garage, septic tank with...	Limerick Local Authorities
22457	APPLICATION FINALISED	16/06/2022	15/06/2022	CONDITIONAL	22/04/2022	Fergal Hanrahan	Coolboy Athlacc Co. Limerick	the following; (a) demolition of existing livestock shed and decommissioning of existing slurry stor...	Limerick Local Authorities
22625	APPLICATION FINALISED	14/01/2023	10/01/2023	CONDITIONAL	03/06/2022	Rosalie Kirby	Ballintaw Athlacc Kilmallock, Co. Limerick	a two storey dwelling house to include installation of wastewater treatment system and vehicular ent...	Limerick Local Authorities
21423	APPLICATION FINALISED	05/08/2021	04/08/2021	CONDITIONAL	01/04/2021	Valerie Lenihan	Clogher East Athlacc Kilmallock, Co. Limerick	the construction of a dwelling house, a domestic shed, an effluent treatment system and polishing fi...	Limerick Local Authorities
21450	APPLICATION FINALISED	02/06/2021	26/05/2021	CONDITIONAL	08/04/2021	Elaine Houlihan	Rathcannon Athlacc Kilmallock, Co. Limerick	the construction of an entrance, dwelling house, garage, domestic wastewater treatment system and po...	Limerick Local Authorities
21451	APPLICATION FINALISED	02/06/2021	26/05/2021	CONDITIONAL	08/04/2021	James Houlihan	Rathcannon Athlacc Kilmallock, Co. Limerick	the construction of an entrance, dwelling house, garage, septic tank and percolation area together w...	Limerick Local Authorities
21480	APPLICATION FINALISED	07/11/2021	28/10/2021	CONDITIONAL	14/04/2021	Paul Neenan	Drombeg Athlacc Kilmallock, Co. Limerick	the construction of a slatted tank and 3 bay cattle shed on existing farmyard including demolition o...	Limerick Local Authorities
21571	APPLICATION FINALISED	08/12/2021	08/12/2021	CONDITIONAL	30/04/2021	Jason Lenihan & Lisa Murphy	Clogher East Athlacc Kilmallock, Co. Limerick	construction of a single storey dwelling house, garage, entrance, proprietary waste water treatment ...	Limerick Local Authorities



Fwd: Ballinlee Green Energy

1 message

Wed, Sep 24, 2025 at 7:45 PM


To: Info Ballinleegreenenergy <info@ballinleegreenenergy.ie>

Hi Nadine,

Hope you are well.

Having still not had a response to my query regarding distance to turbines, I have been trying to book your in person clinic with the link provided but this does not appear to be working. Can you forward a new link or arrange an appointment directly.

I would really like to get my queries responded to and an opportunity to discuss further as part of your engagement process.

Looking to hearing from you regarding an appointment.

Kind regards,

Sinéad Ryan

Can you arrange to

----- Forwarded message -----

From: 

Date: Fri, Aug 15, 2025 at 12:52 PM

Subject: Re: Ballinlee Green Energy

To: Info Ballinleegreenenergy <info@ballinleegreenenergy.ie>

Hi Nadine,

Thank you for your reply.

I am trying to get clarification on two items, namely distance from my property at V35PK38 to the turbine at both Balinee and also at Ballinacurra. You have referenced a distance of circa 760m from the nearest turbine, which specific turbine is this referring to ?

Regarding engagement, you have advised this has taken place in April and latest email that this took place 17th and June 18th. I have checked my diary and we did not have anyone call on either the 17th or 18th June, as there was an occupant working from home on both dates and I can confirm we did not receive any " contact details for arranging a callback". I have also enquired with my nextdoor neighbour, which confirmed they also did not have anyone call to their house on the above dates.

Can you arrange for somebody to call in-person as part of your engagement with homeowners within 1km of the propped development. I am happy to arrange for a time that suits both parties.

I look forward to hearing from you.

Kind regards,

Sinéad Ryan

On Mon, Aug 11, 2025 at 3:56 PM Info Ballinleegreenenergy <info@ballinleegreenenergy.ie> wrote:

Dear Sinéad,

I hope you had a lovely break.

We have completed a distance check from the Eircode you have provided, and your home is approximately over 760m from the nearest turbine.

We called all homes within 1km of the proposed project between Tuesday, June 17th, and Wednesday, June 18th, during our door-to-door engagement, but unfortunately, there must have been no one available at your home at the time of calling. I am sorry that we missed you on this occasion. Please let me know if I can arrange a video or phone consultation for you.

Further engagement with the local community, including a community clinic, will take place in the coming weeks to allow for additional consultation opportunities. The community will be notified when the time and dates are confirmed. The project website, www.ballinleegreenenergy.ie, will also contain regular project updates. We continue to be available by phone and email, also.

Kind Regards,

Nadine

The Community Team at Ballinlee Green Energy

T: +353 (0)61 975 200

A: Station Road, Adare, Co. Limerick

E: info@ballinleegreenenergy.ie | **W:** www.ballinleegreenenergy.ie



Please note: Our Community Team is happy to assist with any project-related queries and is committed to providing helpful, respectful, and timely support. We kindly ask that all communications remain courteous and respectful. The Ballinlee Green Energy community team reserve the right to refrain from further correspondence in cases that violates our code of respectful engagement.

Sent: Saturday, August 9, 2025 10:19 AM

To: Info Ballinleegreenenergy <info@ballinleegreenenergy.ie>

Subject: Re: Ballinlee Green Energy

Hi Nadine,

Thanks for getting back to me, I was on holiday the past week and only reverting now.

Can you outline the set back distance from my property to the proposed turbines at both Balinlee South and Ballinacurra please.

Also you might confirm when door to door consultation will be taking place and if there will be an open public meeting where locals can attend, as would be normal practice with an SID application.

I look forward to hearing from you.

Kind regards,

Sinead Ryan

On Tue 5 Aug 2025, 16:24 Info Ballinleegreenenergy, <info@ballinleegreenenergy.ie> wrote:

Good Afternoon Sinéad,

Would it be convenient for me to phone you tomorrow to discuss? I can be flexible on times to suit you. If so, please share your phone number.

Kind Regards,

Nadine

The Community Team at Ballinlee Green Energy

T: +353 (0)61 975 200

A: Station Road, Adare, Co. Limerick

E: info@ballinleegreenenergy.ie | **W:** www.ballinleegreenenergy.ie



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[REDACTED]
Sent: Friday, August 1, 2025 4:05 PM

To: Info Ballinleegreenenergy <info@ballinleegreenenergy.ie>

Subject: Fwd: Ballinlee Green Energy

Dear Nadine,

I refer to my email below of 29th July and look forward to hearing from you in relation to my queries regarding set back distance and date for door to door in person engagement.

As I mentioned, I don't have any dogs and I am concerned you are mixing my property up with somebody else's.

I look forward to your reply.

Kind regards,

Sinead Ryan

----- Forwarded message -----

[REDACTED] >

Date: Tue 29 Jul 2025, 16:51

Subject: Re: Ballinlee Green Energy

To: Info Ballinleegreenenergy <info@ballinleegreenenergy.ie>

Dear Nadine,

Thank you for your response below.

Can you confirm the location of the 'nearest' turbine referred to please at over 760m and confirm the distance from my property to the proposed turbines at Ballinlee South and at Ballincurra.

Regarding the door to door engagement, I can confirm that nobody called to my house, no contact details for arranging a callback were left and that I do not have ANY dogs.

Can you confirm that the door to door consultations in the area took place in April in advance of the issue of your letter dated May 2025 advising that door to door consultation would be taking place in the coming weeks.

The letter I received, dated May 2025, advises that door to door engagement with locals would be forthcoming.

Can you confirm when this will be taking place?

I look forward to the confirmation of location distances and dates for the door to door consultation at the earliest opportunity.

Kind regards,

Sinéad Ryan

On Tue, Jul 29, 2025 at 4:30 PM Info Ballinleegreenenergy <info@ballinleegreenenergy.ie> wrote:

Dear Sinéad,

Thank you for your email.

We have completed a distance check from the Eircode you have provided and your Eircode is approximately over 760m from the nearest turbine.

Door-to-door consultation took place in April and where a resident was unavailable at the time of our visit, we left our contact details for arranging a callback. I have a note that we attempted to reach your door during our consultations but were unable due to the presence of large dogs.

All residents are also welcome to book a phone or video consultation at a time of their choosing. Please let me know if I can arrange this for you. Additionally, we will also be hosting a community clinic by appointment in the local area in the coming months, which will be advertised via our website. I will ensure that you receive a postal invite to this and I can also notify you via email.

Kind Regards,

Nadine

The Community Team at Ballinlee Green Energy

T: +353 (0)61 975 200

A: Station Road, Adare, Co. Limerick

E: info@ballinleegreenenergy.ie | W: www.ballinleegreenenergy.ie



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Sent: Monday, July 28, 2025 5:30 PM

To: Info Ballinleegreenenergy <info@ballinleegreenenergy.ie>

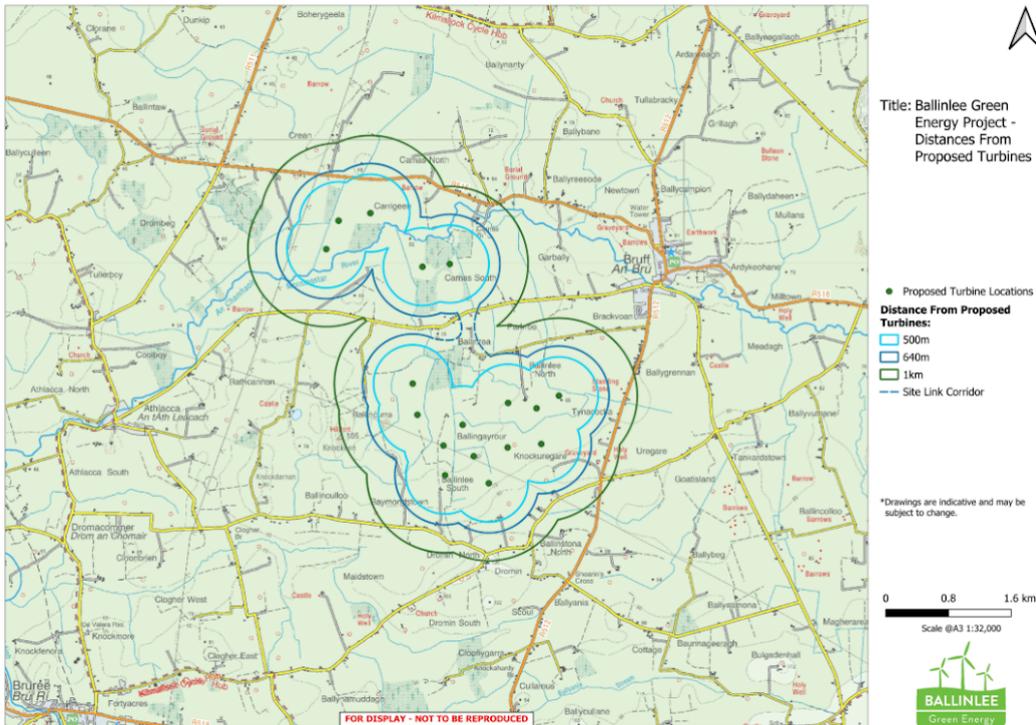
Subject: Ballinlee Green Energy

This is the first time you received an email from this sender (sineadmscanlan@gmail.com). Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Dear Sirs,

I refer to the above and the recently released proposed Turbine Layout and I am seeking confirmation of set back distance from my home at Ryamondstown, Dromin (Eircode V35PK38) from the proposed turbines at Balinlee South and Ballincurra. This is not evident from your website.

PROPOSED TURBINE LAYOUT



I also refer to your letter dated 'May 2025' where you advise your 'dedicated team' will be 'going door to door to discuss the project in person'. Can you confirm the timeline for this in person engagement please. I look forward to hearing from you at the earliest convenience.

Kind regards,

Sinead Ryan