

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

To: An Coimisiun Pleanala

Case Number 323780

<https://online.pleanala.ie/en-ie/sid/observation>

From: Trevor & Elaine Begley

Ballintaw, Athlacca, Co Limerick.

V35NA72

Trevor_begley@hotmail.com

0863578717

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Subject: Formal Objection to Proposed Construction of 17 Wind Turbines

(160m height, 70m blade diameter) by Ballinlee Green Energy in the Bruff, Dromin, and Athlacca Area

Introduction:

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

This objection is based on a number of critical concerns:

1. Health implications associated with noise and low-frequency emissions.
2. Shadow flicker and its impact on quality of life.
3. Environmental risks, particularly to the Whooper Swan (*Cygnus cygnus*), a protected migratory bird species. The common Bat population whose flight paths and natural hunting pathways will be severely disrupted. And other natural impacts
4. Proposed site is a massive Flood plain and I can see no mention in the planning application of where the annual flooding water will be dealt with or directed too, as the local river already cannot deal with the volume of water.
5. Regulations with regards to distance from the nearest turbine to a dwelling house are vague due to lack of proper legislation. Guidelines from 2006 and updated guidelines from 2019 are not adequate to protect our community and environment.

6. Inadequate public consultation and transparency. Ballinlee Green Energy have refused to meet our community as a group to discuss our concerns, despite being invited to numerous community meetings

7. Devaluation of my Property

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I. Health Implications for Residents

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

Sleep disturbance, stress, and headaches have been documented among individuals living in close proximity to large turbines. The proposed turbine height (160m) and scale (17 units) dramatically increase the acoustic footprint of this development.

2. The Environmental Impact Assessment (EIA) should include a detailed, independent health impact study, which we believe has not been adequately conducted or shared with the public. Given the residential nature of parts of the Bruff-Dromin-Athlacca area, this proposal poses a serious risk to public health and wellbeing.

3. Shadow Flicker and Visual Intrusion

Shadow flicker occurs when rotating turbine blades cast moving shadows, which can result in intense and repetitive flashing inside homes. This is especially problematic for individuals with photosensitive epilepsy, autism, and mental health conditions.

The World Health Organisation recommends strict limits on flicker exposure, yet developers often base models on theoretical weather and sun patterns, not local lived experience.

Given the proximity of the proposed turbines to homes in the area, residents are at risk of daily flicker exposure during certain times of the year. This is a clear breach of quality of life and raises concerns under Article 8 of the European Convention on Human Rights (right to respect for private and family life).

4. Impact on Wildlife: Threat to the Whooper Swan Population:

The Whooper Swan (*Cygnus cygnus*) is a migratory species protected under the EU Birds Directive (2009/147/EC) and listed as a Special Protection Interest under the EU Natura 2000 network. The Bruff-Dromin-Athlacca area is part of the migratory path and wintering grounds for Whooper Swans. These birds are highly sensitive to disturbance and habitat alteration. Wind turbines have been shown to:

- Disrupt flight paths
- Increase risk of collision mortality

- Cause long-term habitat displacement

The proposed development lies within proximity to wetlands and agricultural fields commonly used by Whooper Swans for feeding and roosting.

There is a diverse and healthy Bat population in our local Rural area, and this is due to the hard work completed by our local residents, ref: <https://batrehabilitationireland.ie/>

Large proposed wind energy developments like these have been proven to have a massive and detrimental impact on the Local Bat population.

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

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

6. Inadequate Public Consultation and Transparency

Many residents report a lack of:

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

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

7. We live very close to the proposed development and have two children who we hope may settle locally in our community, restrictions on planning permissions and the history of these developers objecting to local residents applying for planning is a concern for our family.

Conclusion:

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

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

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

Signed: Trevor & Elaine Begley

14/11/2025