

Rathvilla House

Rathvilla

Edenderry

Co.Offaly

20 October 2025

An Coimisiún Pleanála

64 Marlborough Street Dublin1

D01 FX63

Re: Submission/Observation on Proposed Ballinla Wind Farm Development Case Reference: PAX19.323579 Applicant: Ballinla Wind Farm Limited Location: Townlands of Leitrim, Lumville, Ballinla, Clarkeville, Ballyfore Big, Ballyfore Little, Ballyeakin and Ballykilleen, in the Barony of Coolestown By, Co. Offaly Project Website: www.ballinlawindfarmsid.ie

Dear Members of An Coimisiún Pleanála,

I am writing to you as a concerned resident of Ballyfore, Co.Offaly to lodge a formal observation and objection to the proposed Ballinla Wind Farm development (the "Proposed Development"). This submission is made in accordance with the public consultation process under Section 37 of the Planning and Development Act 2000 as the project has been designated as Strategic Infrastructure Development (SID). I respectfully urge the Board to refuse planning permission for this project in its entirety, due to significant unresolved environmental, health, and community impacts, particularly those related to noise pollution.

Overview of the Proposed Development

The Proposed Development, as outlined in the application documents available on the project website (www.ballinlawindfarmsid.ie) and the Board's portal, comprises up to seven wind turbines with a maximum hub height of 125 metres and tip height of 185 metres, along with associated infrastructure including access roads, electrical substations, and cabling. Situated in a rural landscape approximately 4 km west of Edenderry and 24 km east of Tullamore, this development would occupy sensitive townlands that are home to farming communities and wildlife habitats. While the applicant highlights the project's potential to generate renewable energy and contribute to Ireland's climate goals, the cumulative impacts on local residents—most critically, excessive noise—have not been adequately addressed. This is especially concerning given the proximity to existing wind farms, including the operational Cloncreen Wind Farm, which serves as a stark cautionary example.

Unresolved Noise Issues from the Cloncreen Wind Farm

My primary objection centres on the potential for the Proposed Development to exacerbate noise pollution in an area already plagued by inadequate management of turbine-generated sound. The Cloncreen Wind Farm, located in east Co. Offaly and operational since approximately 2022, consists of 21 Vestas turbines with a combined capacity to power up to 55,000 homes. Despite its scale and the promises of low-impact operation, it has become a source of profound distress for nearby residents, including myself and my family.

We have endured persistent low-frequency humming, amplitude modulation (the "whooshing" effect caused by blade rotation), and tonal noise that permeates our home, particularly during moderate wind conditions at night. This has led to chronic sleep deprivation, heightened anxiety, and physical symptoms such as headaches and elevated stress levels—issues corroborated by numerous complaints lodged with Offaly County Council over the past three years. For instance, Freedom of Information requests have revealed dozens of reports from residents in the vicinity of Cloncreen, describing the noise as "unbearable" and "all-night humming" that severely affects mental health and daily functioning. These complaints extend beyond Cloncreen to nearby sites like Cloghan and Rhode, indicating a county-wide crisis in wind farm noise management.

Despite repeated communiqués to the community liaison representative for Cloncreen—sent via email our queries regarding noise receptors, baseline noise measurements, and compliance monitoring have gone unanswered. We specifically requested details on how ambient baselines were established under the Wind Energy Development Guidelines 2006 (as amended), including the methodology for identifying sensitive receptors within 500-750 metres of turbines and the use of independent acoustic surveys. To date, no substantive response has been provided, nor has any remedial action been taken, such as the deployment of an impartial acoustic consultant as recommended by affected residents' groups like the Communities & Environmental Protection Alliance (CEPA). This failure to address existing issues undermines the applicant's credibility and raises serious doubts about their ability to mitigate similar problems at Ballinla.

The Cloncreen experience aligns with broader precedents in Ireland, where courts have recognised wind turbine noise as an actionable private nuisance. In a landmark 2024 High Court ruling, residents near an operational wind farm were awarded damages for "unreasonable interference" with their homes' enjoyment, emphasising that noise assessments must consider not only decibel limits but also qualitative factors like tonality and infrasound under the Decree Noise Statutory Nuisance Complaint Methodology. Current noise levels from Cloncreen already exceed World Health Organization (WHO) 2018 guidelines for community noise exposure in many instances, yet enforcement remains lax. Approving Ballinla without resolving these precedents would compound the harm.

Deficiencies in the Ballinla Noise Impact Assessment

The Environmental Impact Assessment Report (EIAR) submitted for the Proposed Development fails to convincingly demonstrate that noise impacts will be negligible. While it references compliance with the 2006 Guidelines, the baseline surveys appear limited to short-term measurements during favourable weather, potentially underestimating worst-case scenarios like those experienced at Cloncreen. Key shortcomings include:

- **Inadequate Receptor Mapping:** Sensitive noise receptors (dwellings within 1 km) are not fully mapped against prevailing wind directions, ignoring how downwind propagation can amplify low-frequency noise over distances greater than modelled.

- **Lack of Cumulative Assessment:** The EIAR does not sufficiently analyse cumulative noise from Ballinla alongside Cloncreen and other nearby installations (e.g., Derries or Meenwaun), where combined effects could push levels beyond the 5 dB(A) threshold for significance.
- **Absence of Independent Verification:** No provision for post-construction monitoring by a third-party acoustician, despite calls from residents for such measures in light of Cloncreen's unresolved issues.
- **Over-Reliance on Predictive Modelling:** Tools like WindFarmer software may not capture aerodynamic modulation or terrain effects in the undulating Coolestown landscape, leading to optimistic predictions that do not reflect real-world distress.

These gaps render the noise chapter of the EIAR unfit for purpose and necessitate a full revision, including on-site verification at Cloncreen as a prerequisite for any decision on Ballinla.

Broader Community and Environmental Concerns

Beyond noise, the Proposed Development poses risks to visual amenity in a valued rural setting, potential hydrological disruptions to local peatlands, and biodiversity loss for bird species using migratory corridors near the River Brosna. Community benefit funds, while welcome, do not offset the irreversible intrusion on our quality of life. As a resident who cherishes the quiet of Offaly's countryside, I fear this project will transform peaceful townlands into industrial zones, echoing the "destroyed homes" lamented by Cloncreen neighbours.

Conclusion and Recommendation

In light of the foregoing, I strongly object to the granting of planning permission for the Ballinla Wind Farm. The Board's approval must prioritise the protection of human health and residential amenity over unchecked renewable expansion. I request that An Coimisiún Pleanála:

1. Commission an independent review of Cloncreen's noise compliance, including resident-led monitoring.
2. Require the applicant to submit a revised EIAR with robust cumulative noise modelling and mitigation commitments.
3. Convene a public oral hearing to allow affected parties, including myself, to present evidence of Cloncreen's impacts.
4. Refuse permission unless these steps demonstrate no foreseeable exceedance of noise limits or resident harm.

I am available to provide further details or attend any hearings and can be contacted at the above details. Thank you for considering this submission in your deliberations. I trust the Board will act decisively to safeguard our community.

Yours sincerely,

Alan Rowan

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