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24th October 2025
64 Marlborough St,
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RE: Planning Ref: PAX19.323579 – Proposed Windfarm development of 7 Turbines, 110kV substation and associated works within the townlands of Leitrim, Lumville, Ballinla, Clarkeville, Ballyfore Big, Ballyfore Little, Ballyeakin and Ballykilleen, in (Coolestown By) Co. Offaly (www.ballinlawindfarmsid.ie)

Development Description: *The development is for the erection of seven wind turbines, each with a maximum blade tip height of 185 metres. A 10-year planning permission and a 35-year operational life from the date of commissioning of the entire wind farm are being sought. The proposed development will also include seven turbine foundations and hardstand areas, a 110 kV electrical substation incorporating both the Independent Power Producer (IPP) substation and wind farm operations compound (including ancillary buildings, security fencing, and all associated works), a ground-based LiDAR station, two new site entrances from the L-5010, new and upgraded internal access tracks, and underground electrical and communications cabling connecting the turbines to the onsite substation. Temporary works will include turbine delivery route (TDR) works along sections of the L-5006 and at the junction of the R-402 and R-420, a construction compound with a mobile welfare unit, a spoil deposition area, and all associated landscaping and surface water management systems. The planning application will be accompanied by an Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS).*

Dear Sir / Madam,

Please find enclosed the required submission fee of 50 euro in relation to the above planning application for the proposed development outlined above (the “Ballinla Windfarm”).

The proposed planning application for Ballinla Wind Farm, is bounded closely to the south, east and west by BnM lands. BnM would like to highlight an area of concern to An Coimisiún Pleanála to aid evaluation of the planning application and are detailed below.

Best Practice Turbine Layout

A key focus of BnM in terms of optimising and realising the full potential of the company’s land with respect to meeting national energy targets is the consistent and considered application of the relevant sectoral guidance, planning guidance and policy across all renewable development projects.

BnM’s emphasis on the consistent and considered application of the relevant guidance has been a focus of planning to date. This is essential to ensure that all developers, and in particular those with lands within a ‘Open for consideration for Wind Energy development’, can operate on a level playing field which does not unduly impact on the development potential of an adjacent landowner. The Offaly County Development Plan 2021 – 2027, Wind Energy Strategy has designated a large proportion of eastern Offaly as an area deemed ‘Open for consideration for Wind Energy development’. The land proposed for the Ballinla Wind Farm and extensive group of BnM’s landbank to both the east, south and west of the proposed Wind Farm lies within this designation.

According to Section 5.13 of the *Wind Energy Development Guidelines* (DoEHLG, 2006), to protect adjoining land wind energy development potential and requirements for optimal performance “a distance of not less than two rotor blades from adjoining property boundaries will generally be acceptable, unless by written agreement of adjoining landowners to a lesser distance”. This was further clarified by the Department of



Environment, Heritage and Local Government (DEHLG) Circular Letter PD 6/16 that “*rotor blades are to be measured according to rotor diameter, and that a distance of not less than two rotor blades is therefore equivalent to two rotor diameters*”

The proposed maximum rotor diameter for Ballinla Wind Farm is 158.7m for all turbines. Best practice dictates a set-back of 317.4m (158.7m x 2) from each turbine to the adjoining land. Three turbines (T5, T6 and T7) are closer than the best practise guidance detailed above. Furthermore, (T5, T6 and T7) are within fall distance of BnM landbank, which creates a risk to BnM owned land during the operational life of the Wind Farm if consented. Please find attached drawing no: BNM_PG_25_19_01_ which demonstrates the turbine locations, an indicative 317.4m buffer applied around the turbines and the distance from the turbines to BnM landholding.

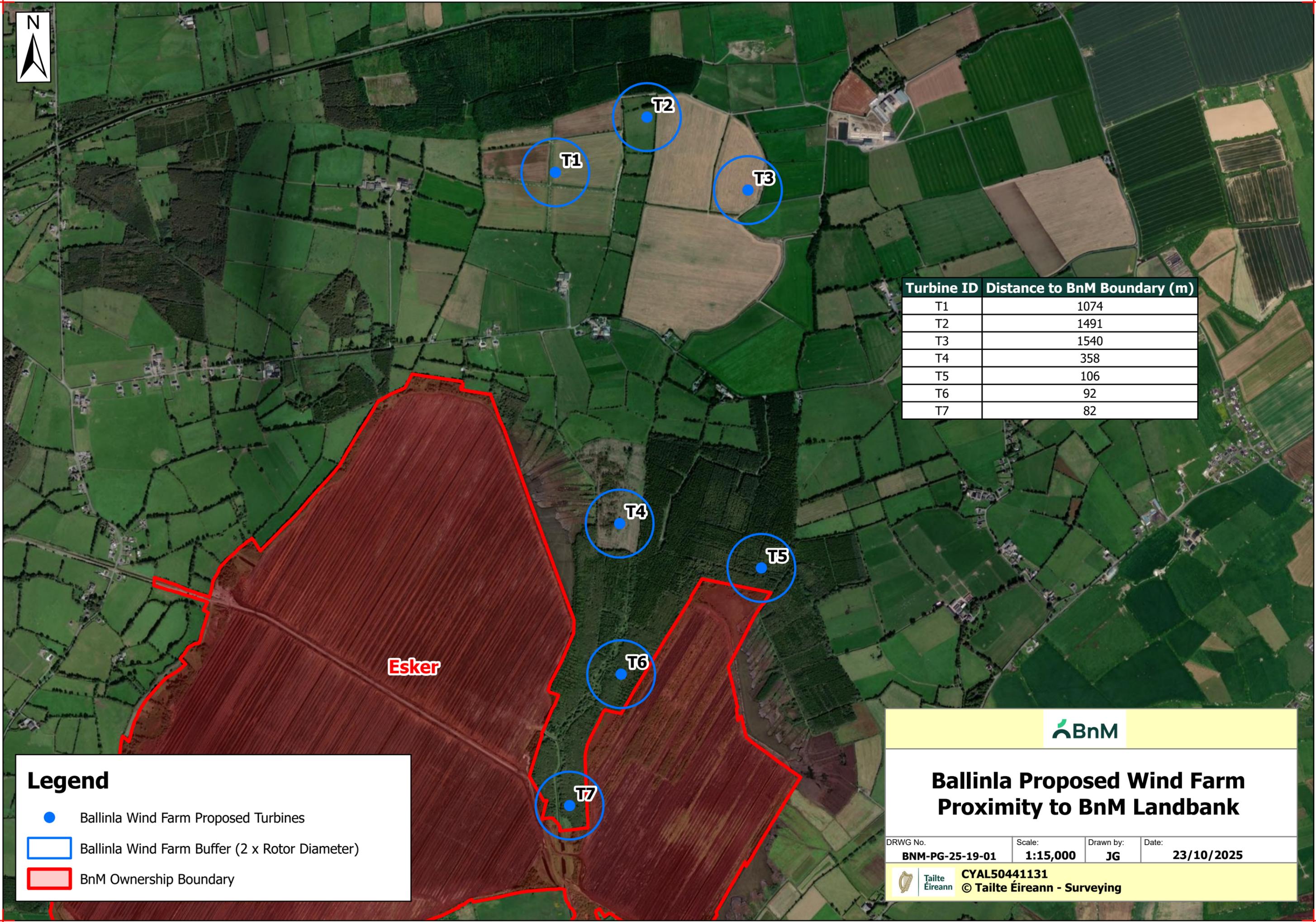
Summary

BnM has concerns as outlined above regarding the application of the Wind Energy Guidelines 2006 and the proximity of turbines to its landbank. It is on this basis that BnM respectfully request the consenting authority to examine the application, seek clarification if required and to apply the guidance in a consistent manner with respect to the proposed development.

Yours Sincerely

Muriel Ennis
Planning Programme Manager

NOTE: The turbine locations were plotted in ArcGIS using grid co-ordinates displayed in Table 2.1 in Chapter 2 - Description of the Proposed Development, Vol II of Ballinla EIAR submitted as part of the Planning Application.



Turbine ID	Distance to BnM Boundary (m)
T1	1074
T2	1491
T3	1540
T4	358
T5	106
T6	92
T7	82

Legend

-  Ballinla Wind Farm Proposed Turbines
-  Ballinla Wind Farm Buffer (2 x Rotor Diameter)
-  BnM Ownership Boundary



Ballinla Proposed Wind Farm Proximity to BnM Landbank

DRWG No. BNM-PG-25-19-01	Scale: 1:15,000	Drawn by: JG	Date: 23/10/2025
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