

To: An Coimisiún Pleanála  
64 Marlborough Street  
Dublin 1

Lorcan Hickey  
Rathvilla,  
Edenderry,  
Co. Offaly  
R45 ER85

24rd October 2025

**RE: Case PAX19.323579 – Proposed Ballinla Wind Farm, Co. Offaly – Submission**

Dear Sir/Madam,

I write in relation to the above application and wish to raise a number of issues which I trust will be taken into consideration during the review of this application.

The application before An Coimisiún Pleanála (PAX19.323579) proposes a wind farm of 7 turbines (tip height 185m), a 110 kV substation, internal access roads, ancillary infrastructure, and associated works in the townlands of Leitrim, Lumville, Ballinla, Clarkeville, Ballyfore Big, Ballyfore Little, Ballyeakin and Ballykilleen (Coolestown By), Co. Offaly. My home is located approximately 1.3km from the nearest turbine, shown in appendix 1. I further note that the existing Cloncreen wind farm (21 turbines, tip height 170 m) is also approximately 1.3 km from my home (to the nearest turbine).

In principle our family have no objection to renewable energy developments however we feel the immediate area surrounding our home has fulfilled its obligation to accommodate wind energy and the addition of another wind farm would negatively impact on our home and property for the reasons set out below.

**Visual, Landscape and Residential Amenity**

Our family home (Eircode R45ER85) is located circa 1.3km to the southeast of turbines 4,5,6 and 7 of the proposed development, see appendix 1. With a tip height of 185m the turbines will be highly visible and dominate both the local skylines and unobstructed views to the west of my property. Blade motion, aviation lighting, glint and glare will materially diminish residential amenity and quiet enjoyment of the land. Screening cannot realistically mitigate turbines of this scale at such proximity and cumulative visibility with Cloncreen further intensifies the impact. Given these considerations, the

visual and amenity impact on my property is significant and unjustifiable at the proposed scale and proximity.

### **Shadow Flicker**

The Irish Wind Energy Development Guidelines (WEG 2006) use a reference of  $\leq 30$  hours/year or  $\leq 30$  minutes/day and this is also repeated in the applicant's Environmental Impact Assessment Report (EIAR) Shadow Flicker Chapter 16. As part of this assessment receptor number 128 appears to be allocated to my property. The results show the max-per-day figure of 0.51 h exceed the 30-minute benchmark. Although the receptor is below the annual total of 30 hours, my home is still modelled to receive 61 days of flicker with peaks above 30 min/day.

The EIAR also states they modelled Ballinla with the nearby Cloncreen Wind Farm within the same assessment parameters and claim "zero cumulative shadow flicker impacts on the identified receptors". Results for this portion of the study are presented as a general statement and not data in tabular form. The EIAR Conclusion relies on a "zero shadow flicker" operational policy however it is unclear how "zero" is achieved and if accepted, it must be conditioned and auditable.

From a health/amenity standpoint there is a worry regarding the potential risks from shadow flicker i.e., annoyance, distraction and headaches. Nuisance is a credible concern at sensitive evening times due to the low-angle evening sun to the west of my property.

### **Noise, Vibration and Health Impacts**

Chapter 10 of the EIAR models turbine noise using ETSU-R-97 and WEDG 2006 standard, based on monitoring data from five monitoring stations. My home lies between stations C and D therefore background levels may not accurately reflect real conditions at my property. Local topography, wind direction and sheltering could result in a higher actual noise than the model predicts. The assessment offers only general cumulative modelling with Cloncreen Wind Farm and lacks receptor specific verification.

Experiences at the Cloghan Wind Farm, also constructed by this applicant reports multiple claims from residents that the noise pollution has caused them "chronic sleep deprivation, mental health deterioration, and effects on children's wellbeing<sup>1</sup>". This raises serious confidence issues about compliance and monitoring at the proposed Ballinla Wind Farm.

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<sup>1</sup> [Offaly Wind Farm is causing serious health impacts, claim residents - Offaly Live](#)

## **Environmental / Technical Concerns and EIAR Deficiencies**

Chapter 6 of the EIAR (Biodiversity) insufficiently addresses the sensitivity of surrounding peat and bogland habitats where turbine foundations, drainage, and access roads risk peat instability, hydrological disruption, and irreversible habitat loss. No detailed plan for peatland preservation, rewetting, or post-construction restoration is provided, and there is no cumulative assessment with the adjacent Cloncreen Wind Farm, despite shared hydrological and ecological systems.

While my property is unlikely to flood, it will suffer indirect impacts through loss of local habitat integrity, landscape quality, and ecological value. The EIAR also omits any binding monitoring, financial bond, or enforcement mechanism to guarantee restoration. Similar environmental concerns led to the refusal of Derryadd Wind Farm<sup>2</sup>, where inadequate peat stability and biodiversity mitigation were deemed unacceptable. The Ballinla proposal has not provided sufficient evidence to demonstrate compliance with national and EU environmental protection requirements or to ensure the long-term stability of peatland and biodiversity within the site.

## **Cumulative Impacts, Precedent & Overdevelopment Risk**

The proposed development must be judged in the context of cumulative burden and not in isolation due to the existence of the large-scale Cloncreen Wind Farm nearby. Some locations including my home may be subjected to multiple turbine shadows or sources of noise, pushing exposure above acceptable levels.

The incremental impact on health, well-being, annoyance and disturbance must be considered holistically as two wind farms in proximity double the exposure risk. An Coimisiún Pleanála should apply the precautionary principle and consider whether further turbine development in this zone is already saturated. There is a concern that granting approval for this wind farm may encourage further expansion in the region, amplifying the negative cumulative burden. Incremental erosion of residential amenity over time by gradual infill of turbines should not be allowed.

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<sup>2</sup> [Court overturns permission for windfarm with joint tallest structures in Ireland – The Irish Times](#)

## Conclusion

Considering the issues highlighted in this submission, I respectfully request that permission for the proposed Ballinla Wind Farm be refused. The cumulative impacts with the existing Cloncreen development have not been fully or transparently assessed, leaving critical gaps in the evaluation of health, noise, and visual effects.

Reports of exceeding noise levels at Cloghan Wind Farm, constructed by the same applicant further undermine the confidence in projected compliance. The combined impacts on residential amenity, health and wellbeing are unacceptable and contrary to the principles of proper planning and sustainable development. Therefore, this proposal should not proceed in its current form.

*Lorcan Hickey* 24.10.2025

Lorcan Hickey

Address: Rathvilla, Edenderry, Co Offaly, R45 ER85.

The fee of €50 is included.

Appendix 1

