FORMAL PLANNING OBJECTION

To: An Coimisiún Pleanála
Case Reference: PAX09.324055 – Proposed Derrynadarragh Wind Farm (& 110 kV grid connection), Co. Offaly / Co. Kildare / Co. Laois
From: Peter & Greta Dwan , Inchacooley, Monasterevin W34 WV60
Date: 18 March 2026

We are homeowners in Inchacooley, where we intended to raise our children and retire in peace and safety. The proposed construction of nine of the tallest onshore wind turbines in Ireland, together with a high-voltage battery energy storage system positioned at the entrance to our home, places the future of our family, our home and our community in jeopardy.

This area is a **biodiversity-rich landscape**, supporting protected birds, wetlands, mature hedgerows and long-established farmland. The development would transform this peaceful rural environment into a major industrial construction zone for an extended period. According to the developer's own route and traffic documentation, our local road network will be subjected to **tens of thousands of heavy-goods vehicle movements**, all diesel-powered, to transport turbines, concrete, machinery and excavation materials.

The works involve extensive trenching, deep excavation and high-traffic activity which will **cover the area in concrete**, remove **mature trees which are over 150 years old**, and disrupt the long-standing farming community. The grid-connection construction alone will require **road closures along multiple L-roads** — including L-71761, L-7176, L-7051, L-7050, L-71764 and L-70481 — making Inchacooley effectively **impassable for months at a time**.

This imposes severe practical and financial burdens. Journeys to and from work and school alone will add hundreds of miles to our weekly necessary runs as well as thousands of euro in fuel and car costs .

The site is a flat, low-lying and marshy landscape which already floods annually, often for weeks. Pouring thousands of tonnes of concrete into waterlogged ground raises fundamental questions **about** geotechnical stability, flood displacement, drainage and long-term safety**.** Transforming boggy, saturated land into a turbine and substation platform is not just environmentally destructive; it is poor planning logic.

Our community has also noted that the wildlife survey effort (purportedly 120+ hours of observation) is not credible when many residents maintain active community alert systems. Any vehicle parked at farm gates for extended durations would always be noticed. That such activity went entirely unobserved undermines confidence in the accuracy of the ecological baseline presented by the applicant.

Residents were never meaningfully consulted, despite the fact that the development will impact daily life, access to homes and farms, noise levels, safety, landscape character, and local ecology. HDD drilling, trenching, dust, dirt, and continuous heavy-machinery noise — six days per week for up to two years (and in reality likely beyond) — would make our home a construction corridor, not a place where family and friends can safely visit**.**

It is also important to highlight that, based on our review, only four public notices appear to have been placed within the affected area. Given the scale of the proposed development and the number of residences and businesses directly impacted, this level of notification is wholly insufficient. The vast majority of local stakeholders were completely unaware that this proposal even existed, indicating that the consultation process has fallen far short of what would reasonably be expected for a development of this magnitude.

This raises serious concerns regarding transparency, procedural fairness, and community engagement. The limited placement of notices has given rise to the impression—whether intentional or not—that there has been an effort to keep the local community uninformed about a development that may have significant implications for road access, delivery routes, safety, and daily life in the area.

For homeowners, residents, critical services and providers and employment this lack of community visibility is particularly troubling.

Further, the River Barrow is at risk. HDD under the river introduces documented hazards, including drilling-fluid leaks ("frac-outs") and sediment disturbance, which can devastate fish populations and aquatic habitats. These risks are confirmed in Irish HDD project examples and construction guidelines for river crossings.

Finally, the proposal threatens a known foraging area for protected bird species, including Hen Harrier — and other wetlands-dependent species. The destruction of habitat, displacement from turbine operation, and loss of feeding grounds cannot be justified simply to facilitate nine industrial-scale turbines in an unsuitable, low-lying location. In the case Sliabh Luachra Against Ballydesmond Windfarm Committee v An Bord Pleanála, An Bord Pleanála's inspector recommended 12 turbines, omitting T8 and T9 due to hen harrier concerns.

This is not an objection to renewable energy itself. It is an objection to a development that is poorly sited, poorly planned, and disproportionately harmful to residents, farms, biodiversity and landscape. We ask that real consideration be given to the genuine concerns of the families and landowners who live here and who will bear the severe and permanent impacts of this proposal.

Reasoning for Objection:

1) Introduction and Standing

I am a resident of the Inchacooley area and live within the zone directly affected by the proposed wind farm, the 110 kV grid connection and associated traffic management. I support renewable energy in appropriate locations, but the proposal in its current form is **not** appropriate due to

demonstrable risks to human amenity and health, road safety, biodiversity (**including Hen Harrier**), hydrology/flooding, and local economy, and because the EIAR and associated documentation are incomplete and/or deficient on several material points

2) The Proposal and Affected Area

The developer proposes nine large onshore wind turbines, a new 110 kV substation, and an 11.4 km underground grid connection, largely routed in public roads and through the townlands of Cushina (Offaly); Derrylea and Inchacooly (Kildare & Laois); Coolnaferagh; Ullard/Controversyland; Lea; Loughmansland Glebe; Clonanny; and Bracklone (Laois). The grid route involves trenching, 15 joint bays, and six HDD (trenchless) crossings including beneath the River Barrow, with extensive temporary road closures on L-71761, L-7176, L-7051, L-7050, L-71764 and L-70481; regional roads R424 and R420 are managed by Stop/Go systems.

The developer's documentation fails to recognise that the affected area is a predominantly agricultural and family-based community, consisting of long-established, multi-generational farms and rural homes. The EIAR presents the landscape as if it were sparsely occupied and of low sensitivity, which is **factually incorrect** and undermines the credibility of the assessment.

The turbine-location map supplied by the developer contains **significant omissions**:

- A **family farm marked in yellow** on the residents' map – containing livestock and occupied buildings – is **entirely excluded** from the developer's map.
- A **second multi-generational farm** is also completely omitted.
- Both farms lie **directly within the zone of influence** of proposed turbines, access routes and construction compounds.

These omissions are not minor cartographic errors. They **alter the apparent proximity** of turbines to residential receptors and livestock areas and **mislead** the decision-maker regarding the true density of farming activity.

Under the Planning and Development Regulations, all application mapping must be **accurate, complete and unambiguous**, and must not misrepresent or withhold relevant land uses. The selective exclusion of occupied farms constitutes a **material inaccuracy**, which affects every environmental chapter that relies on the map (noise, population, human health, biodiversity, shadow flicker, hydrology, etc.).

The introduction of industrial-scale turbines:

- Creates large exclusion areas around turbine bases where livestock cannot safely graze,
- Generates operational hazards (ice throw, blade shed, noise disturbance) that directly affect cattle welfare,
- Disrupts farming circulation routes due to trenching, grid works and road closures,
- Permanently removes productive agricultural land under hardstanding, roads and crane pads.

Generational farms depend on predictable access, safe grazing conditions and stable hydrology. None of these factors are properly addressed in the EIAR.

Under county development plans, rural families are entitled to build:

- Replacement dwellings,
- Farm succession housing,
- Herdsmans' dwellings,
- Proximity-based housing for next-generation farmers.

However, turbine safety setback zones, noise limits, shadow flicker envelopes and BESS safety buffers will make **future dwellings impossible** on large portions of family landholdings. This "planning sterilisation effect" is a **material land-use impact** that the EIAR fails to recognise.

This constitutes an unassessed socio-economic impact on multi-generational farming families.

Hundreds of heads of Cattle are located within 24.5 to 43 metres of a proposed turbine area pose clear risks:

- Startle responses due to turbine noise or shadow flicker,
- Increased risk of injury from construction traffic and machinery,
- Stress-related impacts from vibration and prolonged construction disturbance,
- Accidental contact with site fencing, compounds or open trenches.

Despite this, the EIAR evaluates "population & human health" but does not include livestock safety, even though farming represents the dominant economic activity in the area.

This is a critical omission because turbine zones affect public safety, animal safety and economic viability, all of which are material planning considerations.

There is now a Pattern of Presenting a Sanitised Landscape Instead of Actual Land Use

The combined effect of:

- Omitting occupied farms from the map,
- Minimising local population,
- Ignoring farming intensity,
- Failing to reflect active livestock operations,
- Under-representing residential receptors,
- Not mapping existing farm infrastructure,

creates an **inaccurate and biased portrayal** of the area as "empty land" suitable for industrial development.

This portrayal conflicts with:

- The EIAR requirement to accurately describe population, land uses and human receptors,
- The Habitats Directive requirement to identify land-use impacts,
- The Planning and Development Regulations requirement for accurate red-line and blue-line mapping,

- The EPA EIAR Guidelines which require assessments based on actual, not assumed, site conditions.

Because core mapping is inaccurate, all dependent assessments (noise, health, shadow, biodiversity, traffic) are compromised.

The developer's mapping and baseline descriptions fail to reflect that this is a vibrant farming and family community. Two multi-generational farms, both actively worked and containing significant livestock numbers, are entirely omitted from the turbine-location map. This is a material inaccuracy that distorts the assessment of noise, shadow flicker, safety, access, biodiversity and population impacts. The proposed turbines would render large areas of farmland unsafe for grazing and would sterilise significant lands against future family housing. Presenting the area as sparsely inhabited and excluding established farms reveals a selective narrative rather than an objective assessment of real conditions. This undermines the integrity of the EIAR and prevents the Board from making a legally sound decision.

3) Procedural and Legal Frame

Under the EIA Directive (2014/52/EU) and Irish transposition, the EIAR must assess reasonable alternatives, cumulative effects, population & human
health, biodiversity, soil/water/hydrology, noise, and provide enforceable mitigation/monitoring. National conservation law requires a robust Article 6(3) Habitats Appropriate Assessment where likely significant effects on SPAs/SACs cannot be excluded. The Grace & Sweetman v ABP (C-164/17) ruling emphasises that mitigation cannot be used to "paper over" assessment gaps and that competent authorities must ascertain no adverse effect on site integrity.

The "Environmental Impact Assessment Report – Chapter 09: Biodiversity" contains **material inaccuracies, omissions and misleading statements** which fundamentally undermine the credibility of the ecological assessment and render the conclusions unsafe for decision-making. The most serious inaccuracies relate to **Hen Harrier, Curlew**, survey adequacy, bird and bat protection, hydrology impacts, and cumulative effects.

The EIAR claims there are no Hen Harriers within 15 km of the proposed development.
This is factually untrue.

Local records and community observation confirm that Hen Harriers actively forage and breed in the immediate area, including less than 50 metres from a proposed turbine location.

This directly contradicts the EIAR and is incompatible with known national conservation data from NPWS for the Slieve Bloom Mountains SPA (004160**)**, which identifies the Hen Harrier as:

- A qualifying interest,
- One of Ireland's most important populations,
- A species that commonly forages up to ~5 km beyond SPA boundaries into surrounding lowland farmland and forestry mosaics.

The EIAR *never* assesses this ecological reality.

As Hen Harriers are present at and near turbine locations, the proposed development cannot lawfully proceed without a full, robust Article 6(3) Appropriate Assessment, as required by EU law and confirmed by Court of Justice case law (e.g., *Grace & Sweetman*, C-164/17).

This single inaccuracy is serious enough to **invalidate** the EIAR's ornithological and biodiversity chapters.

The EIAR completely omits Curlew, one of the rarest breeding birds in Ireland, now listed as Critically Endangered in the Republic of Ireland. The below picture shows the last remaining breeding ground for Curlews in the east of the country.
Yet Curlews:

- Are not assessed,
- Are not listed as receptors,
- Are not included in baseline bird surveys,
- Do not appear in the impact tables of Chapter 09.

This is a major ecological omission of a high-value, red-list species whose breeding territories are extremely sensitive to:

- Construction disturbance,
- Visual intrusion,
- Noise,
- Habitat fragmentation,
- Human activity,
- Predator behaviour along construction corridors.

Failure to survey or assess Curlew invalidates the EIAR's compliance with the Birds Directive and EIA Directive.

The EIAR contains a section titled **"**Survey Limitations", explicitly acknowledging gaps in data collection, timing and coverage.

Despite this, the report still concludes "no significant effects."
This is methodologically incorrect.

- Lack of multi-season bird surveys (wintering + breeding + migration).
- No demonstration of full VP (vantage point) coverage. We know that one such area is a ditch down a private road of a local farmer who was not consulted with.
- No evidence of nacelle-height bat monitoring.
- Insufficient coverage of nocturnal species.
- No mapping of functional foraging linkages to SPAs.

An EIAR cannot lawfully conclude insignificant impact when its own survey programme has acknowledged deficiencies.

The EIAR does *not* include:

- Collision-risk modelling for Hen Harrier, Curlew, or other key species.
- Displacement modelling for ground-nesting farmland birds.
- Seasonal sensitivity mapping.
- Barrier-effect analysis for low-level foragers.

The EIAR does *not*:

- Show evidence of static detectors at appropriate heights.
- Map bat commuting corridors across the grid-route hedgerows and treelines.
- Commit to **bat-sensitive cut-in speeds**.
- Provide species-specific risk analysis.

This contradicts standard wind farm ecological practice and the requirements of Chapter 09.

The Biodiversity chapter includes a hydrology section but does **not** examine:

- The flooded nature of turbine fields (visible in photographs).
- Flood displacement caused by turbine foundations and crane pads.
- Secondary contamination of rivers from rising water tables, failed farm drainage or slurry migration.
- Sediment and turbidity risks from HDD under the River Barrow.

HDD is known to carry fluid escape ("frac-out") risks, yet these are not assessed in connection with biodiversity.

This is a clear ecological assessment failure.

The EIAR claims cumulative impacts were assessed, but:

- No quantitative cumulative bird-collision models are provided.
- No cumulative Hen Harrier displacement analysis is included.
- No cumulative bat mortality assessment is produced.
- No cumulative habitat loss accounting across turbine + grid route + other wind farms is shown.

Chapter 09 contains a "Cumulative Effects" section, but it appears qualitative only.
This is legally insufficient: cumulative effects must be quantified, not asserted.

The EIAR lists standard generic measures such as:

- Pre-construction surveys
- Toolbox talks
- "Standard best practice"

None of these are:

- species-specific,
- time-bound,
- measurable,
- enforceable,
- or linked to verifiable ecological thresholds.

Under EPA EIAR Guidelines and EU case law, this constitutes improper reliance on mitigation to justify "no significant effect" conclusions.

The EIAR fails to:

- Correctly identify key species present (Hen Harrier, Curlew).
- Prove surveys were complete or adequate.
- Assess birds or bats using appropriate models.
- Address hydrology-linked ecological risks.
- Quantify cumulative effects.
- Offer enforceable mitigation.

The document is therefore incomplete and misleading, and should not be relied upon to approve any element of this wind-farm proposal.

The Biodiversity chapter contains a section titled **"Local Hydrology"**, describing surface water, drainage and watercourse interactions within the site.
However, it **does not**:

- quantify actual flood extents,
- consider existing saturated soils and standing water,
- model flood displacement caused by turbine foundations, crane pads and access roads.

Below photographs show active flooding in the proposed turbine fields. This aligns with the flat, low-lying landscape described in the EIAR, but the chapter does not analyse how turbine platforms, hardstanding areas and road embankments will displace flood water or where the displaced water will flow.

This is a material omission under the EIA Directive because hydrology must be assessed in connection with biodiversity and water quality, not as isolated chapters.

The project documentation indicates that trenching, excavation and construction works will affect groundwater and local hydrology. The EIAR's hydrology-related sections (including Chapter 09 references to hydrology) acknowledge water-table interaction but do not examine:

- how raising the water table will affect drainage of farmland,
- how farm slurry-management systems will behave when the soil becomes saturated,
- how effluent migration increases when water tables rise.

The omission is serious because the baseline hydrology described in Chapter 09 already indicates an ecosystem influenced by water levels.
Adding impermeable hard surfaces and deep foundations will inevitably shift surface water and groundwater flows, yet this is not modelled.

Local farmers invest significantly in:

- land drainage systems,
- surface water channels,
- slurry containment and management systems.

When the water table rises in a low-lying area, drainage slows or fails. This causes:

Secondary Consequence (not assessed):

If soils cannot drain, animal waste migrates horizontally and vertically into:

- drains,
- ditches,
- and ultimately rivers and streams.

The consequence would be:

- water quality deterioration,
- nutrient pollution,
- increased ammonia/nitrate loading,
- fish habitat degradation.

Yet nowhere in Chapter 09 or its hydrology subsection is this addressed. This is a clear gap, because ecological receptors (fish, macro-invertebrates, aquatic plants) are included in the EIAR's scope, but the mechanism that would damage them is missing.

"Who is to blame if farmers, who have successfully managed land for generations, suddenly find their drainage failing and rivers contaminated?"

The EIAR does not examine liability, does not assess secondary contamination risks, and does not propose:

- monitoring,
- mitigation,
- or a compensation structure.

This leaves farmers exposed to potential EPA penalties for issues caused by the development, not their own practices.

This is a classic unassessed indirect impact — prohibited under the EIA Directive, which requires examination of direct, indirect, secondary, cumulative and transboundary effects.

The EIAR estimates:

- large concrete bases,
- crane pads,
- new access tracks,
- compacted stone,

- substation platforms.

But it does not model:

- flood storage loss,
- increased runoff velocity,
- increased runoff volume,
- altered flow paths.

The “Local Hydrology” section in Chapter 09 simply describes water features; it does not integrate them into quantified impact predictions.

This is scientifically insufficient, especially as the applicant commits to HDD under the River Barrow, a process known to present runoff and mud-release risks in sensitive hydrology.

Chapter 09 is required to evaluate how hydrological changes affect:

- amphibians,
- wet grassland species,
- otter (a qualifying species for many Irish rivers),
- aquatic invertebrates,
- foraging birds (including SPA-connected species).

The chapter lists hydrology as context but does not present:

- flood recession timing changes,
- seasonal inundation impacts,
- habitat-type conversions (wet grassland → standing water),
- downstream eutrophication.

This is a **material flaw**, because the existing hydrological description implicitly confirms the ecological sensitivity of the area.

Under Annex IV of Directive 2014/52/EU, EIARs must assess:

- secondary,
- indirect,
- cumulative
  effects.

Secondary impacts such as increased nutrient loading from disrupted farm drainage are directly within this category.

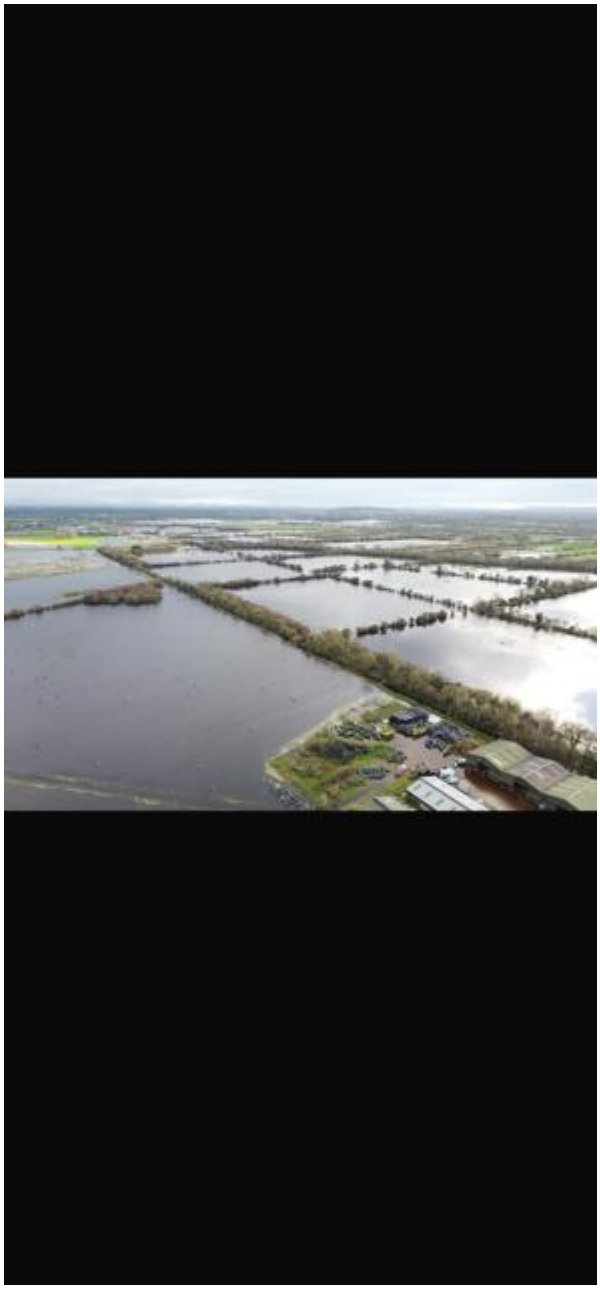
Yet the EIAR does not assess secondary contamination, nor does it discuss:

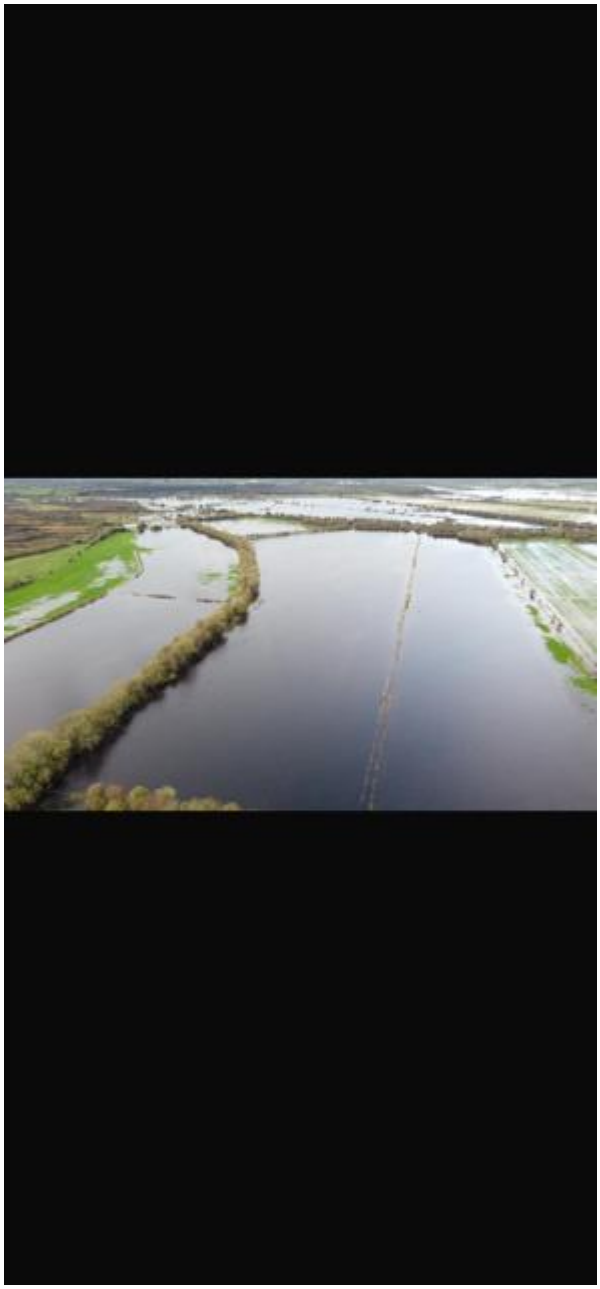
- altered slurry infiltration,
- increased overland flow of pollutants,

- hydrological trapping of waste during floods.

This is a procedural and substantive deficiency.

The EIAR does not address the reality that the turbine lands are already flooded, nor does it assess where displaced water will go when thousands of tonnes of concrete, roads and hardstanding areas are imposed on a flat, saturated landscape. The applicant's own hydrology descriptions confirm the presence of watercourses and wet soils, yet the EIAR fails to analyse secondary consequences such as rising water tables, compromised farm drainage and resulting contamination of rivers by animal waste. These omissions contravene the EIA Directive's requirement to assess indirect and secondary effects, and they place unacceptable environmental and legal risk on farmers who have managed these lands responsibly for generations.





Population, Amenity & Human Health – Noise, Vibration & 24/7 Disturbance

1. Operational Turbine Noise – Severe Under-Assessment

The proposed turbines have tip heights of 185–187 m and unusually large rotor diameters, placing them among the tallest onshore turbines ever proposed in Ireland. Turbines of this scale generate high aerodynamic noise and low-frequency amplitude-modulation effects, particularly at night. Scientific measurements confirm such turbines produce ~90–105 dB(A) at source (the nacelle), with ground-level noise reaching 60–80 dB(A) directly adjacent to the tower base. Using the internationally accepted noise-propagation model (IEA/IEC standard), the expected noise at 50 m from such a turbine is approximately 60 dB(A)—comparable to busy urban traffic and wholly incompatible with rural residential living

Critically, the developer's distance mapping is materially inaccurate. Three turbines are located extremely close to an unmapped, multi-generational family farm:

- **Turbine T4: 24.5 m from the farm boundary**
- **Turbine T3: 41.8 m from the farm boundary**
- **Turbine T9: 43 m from the farm boundary**

These distances are far below every recognised safety or noise-protection standard:

- WHO night-time health-based maximum: 30–40 dB(A) (WHO Environmental Noise Guidelines, 2018)
- Ireland's 2006 Wind Energy Guidelines: assume ≥500 m separation between turbines and homes
- Irish High Court (Byrne & Moorhead v ABO Wind, 2025): turbines were shut down for noise levels *below* those predicted here

At 24.5–43 m, residents, farmers and livestock would be subjected to continuous 60+ dB(A) noise whenever the turbines operate—double the WHO threshold and *completely unacceptable* for rural receptors.

Furthermore, the EIAR mapping fails to identify or acknowledge this farm, its dwelling, yards, or livestock areas. This omission results in a **fatally flawed noise assessment**, because a receptor at **24.5 m** cannot simply be excluded.

The proposal also fails to recognise that the area supports **500–1,000 livestock animals** which require constant human presence for:

- feeding,
- calving assistance,
- veterinary treatment,
- herd management,
- welfare monitoring.

Placing turbines 24.5–43 m from active livestock housing shows a **reckless disregard for animal welfare**, farmer safety and daily farming operations. Excluding this farm from turbine-distance maps is a **serious and deliberate omission** which materially misrepresents the actual receptor environment.

Turbines located 24.5 m, 41.8 m and 43 m from an active farm are entirely incompatible with WHO guidance, Irish wind-energy policy, noise science, and basic agricultural safety. These errors render the EIAR's noise conclusions invalid, and the proximity of T3, T4 and T9 to unmapped farm receptors alone should be grounds for **refusal**.

2. Construction and HDD noise/vibration: Horizontal Directional Drilling (HDD) and trenching generate prolonged low-frequency noise and vibration with heavy plant, mud systems and vacuum tankers, often for extended hours. HDD is standard for river/road crossings but remains high-impact locally. Irish energy/HDD documentation confirms HDD's arc-path drilling, long reach (up to ~1 km), and intensive equipment footprint.
3. BESS (Battery Energy Storage) 24/7 noise: If a BESS is installed adjacent to homes, continuous fan/inverter/transformer noise ("tonal hum") operates day and night. Irish BESS noise reports (e.g., Lackareagh BESS, Co. Clare) identify these as primary operational noise sources requiring detailed assessment; other developers (e.g., Coldwinters, Dublin) acknowledge that full noise assessment is

mandatory. Acoustic practice applies BS 4142 because BESS is an industrial source even in rural settings.

On Population & Human Health, ABP must be satisfied the noise baselines, night-time scenarios, amplitude modulation, HDD vibration, and BESS operational noise were fully, transparently assessed and that enforceable mitigation is presented. If not, the precautionary principle requires refusal.

I wish to draw the Board's attention to the fact that the proposed Battery Energy Storage System (BESS) is located directly at the entrance to my home. This is not a minor inconvenience. It is a fundamental safety issue, a human rights issue, and a planning failure of the most serious kind.

The BESS location would result in residents being effectively trapped in their home

The construction methodology for the grid route confirms that works progress via full road closures, rolling excavations of 50–100 m sections, trenching, joint bays, HDD compounds and heavy vehicle activity along the local L-road network that includes Inchacooley. Residents are told that "local access will be maintained," but the methodology shows this is not realistic in practice when large machinery, open trenches and heavy plant occupy the road immediately outside an occupied home.

Because the BESS is positioned at my driveway, any construction phase affecting that section of road or the BESS compound area would leave me and my family physically unable to enter or leave our property for prolonged periods. The Traffic Management Plan anticipates closures lasting weeks per section, not hours.

This is a direct and unacceptable impact on:

- emergency access
- school transport
- work obligations
- medical appointments
- deliveries & daily necessities

No resident should be placed in a position where they are **held captive in their own home** because an industrial energy facility is being constructed at their only access point.

Irish BESS safety assessments (e.g., Tirawley BESS, Mayo) identify **thermal runaway**, **explosion risk**, and **toxic gas release** requiring strict separation distances, access control and emergency response planning. These must **not** occur at the boundary of a family home.

Locating a large-scale lithium-ion energy storage system:

- at a domestic entrance,
- on a narrow rural road that may be closed during works,
- without guaranteed 24/7 emergency vehicle access,

is contrary to good planning, public safety and common sense.

Despite extensive detail on road excavation, trenching and closures for the underground grid, the EIAR:

- does **not** identify homes directly adjacent to BESS infrastructure
- does **not** assess loss of access to private property
- does **not** assess entrapment during rolling closures
- does **not** assess emergency-response route obstruction
- does **not** model the cumulative effect of simultaneous BESS works + trenching

This is a material omission, as access to one's home is a basic planning right and a fundamental aspect of population & human health, which the EIAR is legally required to address.

The construction schedule indicates:

- 7–8 months of trenching,
- 3 months of jointing,
- 3 months of reinstatement,

with potentially overlapping works across the local roads.

For households with the BESS at their entrance, this means:

- continuous noise, dust and vibration,
- blocked access,
- no safe parking,
- impeded farm operations,
- risk of being unable to leave during medical emergencies,
- barrier to visitors, carers, family support,
- potential months where vehicular access is physically impossible.

This is not compatible with residential amenity or rural living standards. It is an **unacceptable impact** under any Irish planning framework.

No other energy development in Ireland places a **BESS compound directly outside a family home**. In planning terms, this is a breach of:

- residential amenity principles,
- separation-distance norms,
- public safety guidelines,
- emergency access requirements,
- human health assessment obligations,
- and the **EPA EIAR Guidelines**, which require proper assessment of direct, indirect and cumulative impacts.

This location is **not defensible**.

The proposed BESS at the entrance to my home would leave my family effectively trapped for weeks or months at a time, expose us to industrial safety risks, remove our emergency access, and destroy our ability to live safely. There is no assessment of these impacts in the EIAR. The location is wholly inappropriate, unsafe, and contrary to proper planning and sustainable development.

B) Road Safety & Access – Rolling Closures on Narrow L-Roads (Expanded & Strengthened)

The grid-route Traffic Management Plan confirms that the development will require rolling road closures on six local rural roads: L-71761, L-7176, L-7051, L-7050, L-71764, and L-70481, with only Stop/Go systems applied to the R424 and R420 regional routes.

These are the only connecting routes for local residents, farmers, school buses, heavy agricultural machinery, delivery vehicles and emergency services. In such a sparse rural network, closure of even one road creates severe disruption; closure of six is a major impact of strategic significance.

The developer states that works will advance in 50–100 m rolling sections per day, but this does not reflect the cumulative burden on residents and the agricultural community. Even if only one section is "under active work" at any given time, the actual lived reality is that residents will face:

- Complete inability to use affected roads for long periods
- Loss of safe access to homes, farms and livestock
- Major detours across multiple counties
- Blocked machinery routes during critical farming periods

Because the local roads form a **closed network**, households will be forced to divert long distances each day—for work, school, college, medical appointments and daily living.

Many households have:

- Two cars,
- Adult children driving to work or college,
- Dependence on quick access to towns and services.

Weekly detours will easily accumulate to hundreds of kilometres, leading to:

- Significant fuel costs,
- Increased vehicle wear,
- Lost time,
- Increased carbon emissions, contradicting the project's own claimed climate benefits.

The financial burden is **material**. Rural households cannot absorb escalating fuel, maintenance, and time costs caused solely by this development.

The EIAR completely ignores how this development affects modern farming machinery, which is:

- Very large,
- Difficult to manoeuvre,

- Often the full width of a rural road,
- Essential during silage, slurry, calving and harvesting seasons,
- Required 24/7, including late evenings and at night.

There are no alternative safe routes for many farmers except through Portarlington town itself—an area unsuited to the movement of:

- Silage wagons
- Mowing units
- Balers
- Massive tractors with twin wheels
- Tankers
- Diet feeders

In many situations, these machines must be escorted ("shaperoned") for safety, adding:

- Labour costs,
- Machinery wear,
- Fuel consumption,
- Additional traffic hazards.

There is **no assessment** in the EIAR of the obstruction or delay to:

- Livestock emergencies
- Veterinary callouts
- Calving complications
- Movement of feed, hay, or slurry during regulated windows
- Access to grazing land across the townland

This is a **24/7 industry**. The EIAR treats farming as if it were intermittent or optional.

Residents widely acknowledge that many roads in these townlands are already dangerous by any standard, with:

- Sharp bends
- Poor sightlines
- No hard shoulders
- Single-vehicle width
- Deep verges and drainage ditches
- Soft, unstable edges that collapse under heavy loads

The introduction of:

- HGV turbine delivery trucks
- Concrete lorries
- Low loaders
- Excavators

- HDD equipment
- Frequent traffic-control movements

onto these roads significantly increases the risk of:

- Collisions
- Farm machinery accidents
- Ditching
- Rollovers
- Pedestrian danger
- Emergency vehicle delays

The EIAR provides no realistic modelling of accident risk and simply assumes all impacts can be mitigated by generic “Traffic Management Plans”.

This is not credible or acceptable.

An Bord Pleanála has previously refused wind farms due to undue burden on rural road networks, including the West Cork refusal, where turbine-delivery and construction traffic was deemed an unacceptable impact on narrow, winding rural roads serving farming communities.

The Derrynadarragh proposal presents even more severe impacts, because:

- Six L-roads will be closed
- Regional roads will operate under Stop/Go
- There is no alternative parallel network
- Farming machinery depends on these routes daily
- Residents have **no alternative safe access**

The scale of disruption is incompatible with proper planning and rural safety.

The developer provides no guaranteed or enforceable timeframes for when each road closure will occur.

Farmers therefore cannot plan for:

- Silage cutting (multiple cuts per year),
- Calving seasons,
- Winter feeding cycles,
- Compact slurry spreading windows (legally regulated),
- Veterinary schedules,
- Access between fragmented land parcels.

This uncertainty alone creates logistical and safety hazards that are unacceptable for a working agricultural community.

The proposed rolling closures across six local L-roads, without adequate alternative routes, clear timeframes, or rural-machinery safety planning, would cause enormous disruption, financial hardship, traffic danger, and increased accident risk for both residents and farmers. The EIAR fails to assess these impacts and therefore cannot be relied upon as a complete or accurate representation of the road-safety consequences.

This alone is sufficient reason for **refusal** under proper planning and sustainable development principles.

C) Battery Energy Storage System (BESS) – Fire, Explosion & Toxic Gas Risk Near Dwellings

Irish planning files demonstrate that Battery Energy Storage Systems (BESS) present a high-hazard industrial risk, including:

- Thermal runaway fires
- Explosion events in containerised units
- Release of toxic and flammable gases (e.g., hydrogen fluoride)
- Rapid fire escalation within battery modules
- Severe challenges for rural fire-service response

These hazards are explicitly documented in the Tirawley BESS Fire Safety Assessment (Co. Mayo), which identifies the need for:

- Large separation distances from receptors,
- Adequate gas-venting systems,
- Fire compartmentation,
- 24/7 monitoring and emergency-response access,
- Specialist firefighting procedures because lithium-ion fires cannot be extinguished conventionally.

In addition, modern Irish storage projects such as Statkraft's 20 MW / 4-hour Fluence BESS systems show that these are industrial-scale energy facilities, not small ancillaries.

The proposed location for the BESS compound is directly at the entrance to my home.
This creates an immediate, unacceptable, and unmitigatable risk to:

- my family's life safety,
- our ability to evacuate,
- the ability of emergency services to reach us,
- the protection of our home in the event of battery failure, fire or explosion.

Despite this, the EIAR **does not identify my home**, does not classify it as a receptor, and does not include it in the hazard-zone mapping typically required for BESS risk assessment.

This raises serious questions:

- Who carried out the risk mapping?
- Which qualified fire-safety professional approved a BESS hazard zone at the boundary of an occupied dwelling?
- How could any competent assessor overlook a home located *at* the BESS site?

This is not a clerical error –
It is a material misrepresentation that invalidates the BESS safety conclusions in the EIAR.

Ireland has no national setback distance for BESS, unlike other jurisdictions where:

- 100–300 m is the minimum, and
- 500 m–1 km is recommended in low-resource fire-service areas.

In the Tirawley assessment, separation and access requirements are regarded as critical safety features, not optional design elements.

Placing a BESS directly beside a family home is **incompatible with any international practice** and would not be permitted in:

- the UK
- the EU
- Australia
- the United States
- Canada

It is only being attempted here because **no national setback exists**—and the EIAR exploits that regulatory gap.

ABP cannot approve such a configuration without contravening basic planning, health & safety and fire-engineering principles.

Because the BESS is at my only driveway access, and because the grid-connection construction involves rolling road closures and heavy machinery on L-roads, my family could be trapped during:

- a BESS emergency
- a thermal-runaway event
- a gas-venting event
- or even routine construction works

No assessment in the EIAR addresses:

- Emergency egress for residents
- Emergency service access during a battery fire
- Temporary exclusion zones, which can extend hundreds of metres
- Evacuation procedures when the BESS is directly in front of a home

Without these, the EIAR's compliance with the EIA Directive's requirement to assess Population & Human Health is demonstrably inadequate.

The report does not:

- Identify my dwelling or others in immediate proximity
- Include my property in noise, vibration, safety or risk modelling
- Assess exposure to toxic gases
- Assess blast overpressure or heat radiation
- Include a fire-engineering report
- Include emergency access/egress plans
- Provide setback rationale
- Provide a hazard-zone diagram
- Include a BESS failure–mode analysis
- Provide a detailed design for fire protection systems
- Provide evacuation or shelter-in-place procedures

This is not a minor flaw.
It is a **fundamental and dangerous omission**.

Given the evidence, I formally request that An Coimisiún Pleanála require:

1. The identity and credentials of the person responsible for BESS siting and hazard-zone assessment.
2. All BESS fire-safety documents, including:
    - Thermal runaway modelling
    - Gas dispersion modelling
    - Blast-load calculations
    - Fire-compartmentation drawings
    - Emergency-access plans
3. A corrected receptor map showing my home and all others within 1 km.
4. A revised BESS risk assessment incorporating the correct dwelling locations.

Until these are provided, the EIAR's BESS conclusions cannot be considered valid.

It is indefensible and unsafe to position an industrial-scale lithium-ion BESS at the entrance to an occupied family home. The EIAR fails to identify the dwelling, fails to assess the risk, and fails to apply the minimum level of professional diligence required for such high-hazard infrastructure. This must be treated as a material error and grounds for refusal.

D) Biodiversity & Hen Harrier – Article 6(3) Compliance and Precaution

The Slieve Bloom Mountains SPA (004160) (Laois/Offaly) is designated for Hen Harrier (Annex I). NPWS documentation confirms it is a national stronghold; Hen Harrier often forage up to ~5 km from nests into lowland farmland and forestry mosaics. Construction (HDD, lighting, heavy traffic) and tall structures can displace foraging and create barrier effects. The State's Hen Harrier

Threat Response Plan (2024–2028) stresses action inside and outside SPAs and a precautionary approach.
Irish precedent shows bird/ecology risks have led to refusals or judicial interventions (e.g., scenic Cork refusal citing protected species; whooper swan habitat case in Cork; Waterford Comeragh refusal). The Board must have robust, multi-season survey evidence and collision/displacement modelling, not generic assertions.

E) Hydrology, Flooding & Water Quality – River Barrow HDD and Low-Lying Lands

The grid route proposes Horizontal Directional Drilling (HDD) under the River Barrow, together with long stretches of trenching and excavation across low-lying, flood-prone lands. While HDD reduces surface disturbance, it does not eliminate flood, sediment or pollution risk. HDD is known to cause "frac-outs" — where drilling muds (such as bentonite) escape into surrounding soils or watercourses — which can devastate fish and aquatic ecosystems.

The EIAR fails to quantify:

- Increased runoff from turbine platforms, hardstands, crane pads and 9+ km of new tracks
- Flood displacement into surrounding farmland
- Impacts of a **rising water table** on agricultural slurry-management systems
- Sediment pulses, turbidity events, or pollutant migration
- Climate-adjusted rainfall scenarios, despite evidence of worsening seasonal flooding

This is not a theoretical issue — the River Barrow and Portarlington area have experienced repeated, severe flooding in recent years.

The QR code is footage of the area shot using a drone where hand marks are clearly seen. This is the area where the proposed wind turbines are to be situated. One has to call into question the ecological and financial disaster which will occur if this permission is granted.

Flooding in the River Barrow / Portarlington Area is a Matter of Public Record

https://www.rte.ie/radio/podcasts/22561604-michael-mileys-flooded-farm/ - It is important to note that this is one of the farms omitted from all maps showing the area.

RTÉ News – Nov 2025

RTÉ reported flooding in Portarlington (Laois–Offaly border), where the River Barrow overtopped, flooding lands and roads after prolonged rainfall.
Flood impacts were made worse because:

- Ground was already saturated
- Many rivers were at capacity
- Flooding continued over the weekend [rte.ie]

This confirms precisely the conditions the EIAR refuses to model.

Leinster Express – Nov 2025

Video and reporting showed Portarlington almost at a standstill, with:

- Multiple roads impassable
- Spa Street partially flooded
- The Barrow overflowing into fields and roads on both sides [leinsterexpress.ie]

This demonstrates the exact lands where the grid route and HDD works are proposed are already inundating.

Offaly Express – Nov 2025

Severe flooding again documented the Barrow overflowing its banks, closing Botley Lane and causing widespread disruption on Offaly side of Portarlington. [offalyexpress.ie]

Offaly Independent – Nov 2025

Flooding across Offaly forced multiple road closures, including areas around Portarlington, where the Barrow "is overflowing its banks."
[offalyindependent.ie]

KildareNow – Feb 2026

The Inland Waterways Association of Ireland (IWAI) publicly expressed "dismay" at extensive flooding along the River Barrow through Kildare, Laois and other counties — including Portarlington — stating that the flooding has become severe and repetitive.
[kildarenow.com]

These independent reports conclusively prove:

- The Barrow catchment is flood-vulnerable
- Severe flooding is recurring, not exceptional
- Roads needed for the grid route regularly become impassable
- Fields proposed for turbines, crane pads and grid works are already waterlogged and prone to prolonged flooding

EIAR Fails to Address Flood Storage Loss & Flood Displacement

The works will introduce:

- Large concrete turbine foundations
- Crane pads
- Substation platform
- Heavy compaction

- 9+ km of new access roads
- HDD compounds
- Joint bays, cable trenches and reinstatement

In a landscape already shown to flood annually, these interventions remove natural flood storage, displace water laterally and vertically, and accelerate runoff.

Yet the EIAR:

- Provides no flood-modelling
- Does not incorporate OPW CFRAM flood maps
- Does not model water displacement
- Ignores Barrow overbank scenarios documented by RTÉ and multiple newspapers
- Does not include climate-adjusted rainfall scenarios

This is a fatal omission under the Water Framework Directive, which prohibits deterioration of water-body status.

Farmers in the area have invested for generations in:

- Land drainage
- Slurry-management systems
- Drain and ditch maintenance to protect rivers

When the water table rises or works obstruct drainage:

- Slurry can migrate into rivers
- Livestock waste may enter saturated ditches
- Floodwater can breach containment systems
- Pathogens and nutrients (ammonia, nitrates) can reach the Barrow

The EIAR contains **no secondary impact assessment**, even though the flooding evidence makes such impacts **inevitable**.

HDD under the River Barrow introduces risks including:

- Frac-out of drilling muds into floodwaters
- Contamination of salmonid habitat, invertebrates, macrophytes
- Bentonite deposition on spawning beds
- Sediment surges

Given the **documented flooding** (RTÉ + multiple papers), failing to assess HDD during flood conditions is a **serious methodological failure**.

Climate projections and national bodies are clear:

- The area has experienced **multi-day rainfall saturation events**

- River systems are reaching capacity faster
- Flooding is increasing in frequency and duration
- Public authorities (IWAI, councils, NDFEM) have acknowledged the scale of Barrow flooding [kildarenow.com]

The EIAR's hydrology chapter does not incorporate this reality.

Independent flood evidence (RTÉ, Leinster Express, Offaly Express, Offaly Independent, KildareNow) proves beyond doubt that the area is prone to prolonged flooding, road closures, Barrow overflows and saturated soils.

Yet the EIAR:

- Does not model winter flooding
- Does not model Barrow overbank scenarios
- Does not model water displacement from turbine infrastructure
- Does not analyse HDD fluid escape during flood conditions
- Does not assess rising water tables
- Does not consider agricultural contamination
- Does not evaluate climate-adjusted rainfall
- Does not address cumulative hydrological impacts

This renders the hydrology assessment non-compliant with the EIA Directive, EPA EIAR Guidelines and the Water Framework Directive, and is a strong basis for refusal.

F) Landscape & Visual

Large turbine arrays have been refused where they overwhelm sensitive or valued landscapes (e.g., West Cork; Comeragh Mountains, Waterford). Although Inchacooley is not an upland ridge, the receiving environment is a flat, low-lying rural setting: turbines of ~185–187 m will dominate near-field views and alter character across several townlands (Lea, Loughmansland Glebe, Clonanny, Bracklone), contrary to proper planning and sustainable development if not convincingly mitigated.

Requested Outcome

Primary Relief – REFUSE PERMISSION

Refuse permission on the basis of:

- **Population & Human Health:** incomplete/insufficient assessment of turbine/HDD/BESS noise and vibration, night-time impacts, and enforceable mitigation.
- **Roads & Safety:** disproportionate impact arising from **six** local road closures and cumulative disruption.
- **BESS Safety:** unacceptable **fire/explosion/toxic gas** risk to nearby dwellings absent proven separation and emergency planning.
- **Biodiversity (Hen Harrier):** insufficient certainty under **Article 6(3)** on foraging displacement/barrier effects; precautionary principle applies.

- **Hydrology:** insufficient climate-adjusted, WFD-compliant assessment for **HDD under the Barrow** and broad trenching/track works.
- **Landscape & Visual:** over-dominance of very tall turbines in a low-lying rural landscape, consistent with recent refusals.

Declaration

In conclusion, the cumulative evidence presented demonstrates that this application is fundamentally flawed, both in methodology and in substance. The Environmental Impact Assessment is littered with inaccuracies, omissions, and material misrepresentations—most notably the failure to acknowledge nearby homes and multi-generational farms, the false claims regarding the absence of protected species such as the Hen Harrier and Curlew, the disregard of significant and well-documented flooding in the River Barrow catchment (as confirmed by RTÉ and multiple regional news reports), and the complete omission of critical safety, access and hydrological risks. The proposed BESS location at the entrance to my home, the proximity of turbines as close as 24.5 m, and the extensive rolling road closures on narrow rural L-roads would together create unacceptable risks to life, property, animal welfare, emergency access, and the daily functioning of this long-established farming community.

For these reasons, it is my respectful submission that this development is not compatible with proper planning or sustainable development, does not comply with the EIA Directive or Water Framework Directive, and would result in irreversible harm to residents, farms, landscape, hydrology, biodiversity and community safety. I therefore request that An Coimisiún Pleanála refuse permission in full. Should the Board require clarification on any matter raised, I am willing to provide additional evidence, mapping and photographic records.

Signed:

Peter & Greta Dwan

Inchacooley

Monasterevin