

AN COIMISIÚN PLEANÁLA	
LDG-	088 752-20
ACP-	
02 JUL 2026	
Fee: €	57
Type:	CP
Time:	11:55
By:	KE

Airidas & Brigita Dzimidias
Loughkeen, Shinrone, Co. Tipperary R42C527
26/6/2026

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

28th June 2026

Case Ref: Planning Application PAX 92.324279 — Proposed Ballincor Wind Farm, Co. Offaly

Receptor 68

Dear Sir/Madam,

We are writing as the residents of Receptor 68 in the developer's register. We bought this home eight years ago, in a quiet rural area on the Co. Tipperary/Offaly border, and we have built our lives around it. This house, the land it sits on, and the businesses we have grown from it are our retirement plan and the reason we chose this particular place — the bog, the wildlife, the silence, the air, the space to do work that depends on those things existing. We are asking An Coimisiún Pleanála to refuse permission for the proposed Ballincor Wind Farm under reference PAX 92.324279.

Our home is identified as Receptor 68 (H068) in the developer's own assessment. The nearest of the eleven proposed Ballincor turbines, T03, would stand 1,071 metres from our house, west of the cluster, in direct line of sight from our property. That is one side. On the other side, the existing Lacka / Skehenagh (Knockshegowna) wind farm sits behind us — the nearest of those turbines just 979 metres from our home, closer to us than the proposed Ballincor cluster. Eight Knockshegowna turbines run along the high ground directly behind the house. Our home is not a property facing a single wind development. It is a property being sandwiched between two.

On noise, the developer's own consultant predicts a cumulative night-time level at our home of 39.1 decibels against an assigned limit of 43.0 decibels — a 3.9 decibel margin. That margin reads, on the page, as comfortable headroom. It is not. The same submission lodged with this objection sets out, on the developer's own coordinates and methodology, that the mandatory valley correction required by §4.3.9 of the IoA Good Practice Guide has not been applied at any property in this assessment nor has the cumulative assessment been adequately applied. The same point applies to the night-time background level itself: the limit assigned to NIML2 is calibrated on a summer-only survey, and at the worst-case wind speeds for our home (8 to 9 metres per second) the background figure the limit rests on is not measured at all — it is extrapolated. The 3.9 decibels of stated margin at our home has not been stress-tested against the corrections the developer's own methodology requires.

One of us works from home four days a week. That work depends on quiet, on stable WiFi, and on the absence of the continuous low-frequency acoustic exposure that even compliant wind turbines produce at the distances we are talking about — 1,071 metres on one side and 979 metres on the other. The published research on wind turbine noise and cardiovascular effects (including the WITNES polysomnographic study at the University of Gothenburg) identifies sleep architecture changes and elevated cardiovascular response among the documented effects of chronic exposure, and identifies people with pre-existing conditions such as hypertension as one of the populations most vulnerable to those effects. One of us has hypertension. We have done the research that the developer's health chapter chose not to do, and the conclusion we have reached is that a planning decision built on a 3.9 decibel stated margin, with the corrections that the developer's own methodology requires unapplied, with the background data at the worst-case wind speeds extrapolated rather than measured, and with no equivalent margin at all between the Knockshewowna turbines and our home on the other side, is not a planning decision built on evidence that we can safely live with.

On shadow flicker the developer's own software records 26 hours and 7 minutes of shadow flicker per year at our home in the worst case, on 83 days of the year, with a single-day maximum of 34 minutes — above the 30-minute daily threshold the planning system applies. Chapter 16 of the developer's report records 18 days exceeding the 30-minute threshold at our property. The developer's own Appendix 16-1, on the same model run, records 83 days of shadow flicker per year. 65 of those days — days the developer's own software identified — do not appear anywhere in the chapter placed before the Board. They are the days on which shadow flicker happens at our home for less than 30 minutes, and the developer omitted them. For a household where one person is working from home four days a week, on roughly one day in five of every year for the operational life of the development, the rotation of a 180-metre turbine blade will cast shadow through the windows of our office — and on most of those days the chapter the Board reads says nothing about it. The Expected annual figure of 4 hours 34 minutes on which the developer relies to show compliance is built on Birr 1981–2010 sunshine data 27.5% lower than the contemporary record at Gurteen 4.5 km away; corrected for that error alone, the Expected figure rises to 5 hours 49 minutes, and the method by which the Expected value is derived has never been disclosed in any submitted document. Our future daily life and the prospect of living here comfortably is unassessed by the Applicant.

On visual impact, given our elevation, 5 of the 11 proposed Ballincor turbines will be entirely visible, together with 3 of the existing Knockshewowna turbines — 8 wind turbines in a single combined field of view. The Ballincor cluster alone would occupy approximately 75 degrees of our visible horizon. Eight Knockshewowna turbines stand on the ridge directly behind the house, defining what we already see when we step out the back door. Ballincor would occupy what we see when we step out the front door. There is no direction left from which the cumulative visual experience does not include industrial wind turbines.

The two businesses we have built here cannot survive this development as proposed. The first is AA Saunas — a sauna and hot tub business we have grown from this property over a number of years. The second is a retreat centre which we are developing on our own landholding and the adjoining

landholding, with associated glamping accommodation, intended as the next stage of the same enterprise. The proposition both businesses sell is silence, darkness, intact landscape, the natural rhythms of birdsong and weather and the open sky. The proposition does not survive 1,071 metres from an 185-metre tip-height turbine cluster on one side and 979 metres from an existing wind farm on the other. No mitigation condition attached to a wind farm permission can recover a retreat business whose product is the absence of the structures the permission has just authorised. The retreat we have spent years working towards is, were the development to be granted, gone.

I am a local beekeeper. I manage 45 active hives in the immediate vicinity of the proposed turbine site — I carry out swarm removals locally and catch wild swarms from the woods that border the bog. The hives produce bog heather honey, which is the most valuable honey product on the Irish market, and at the level of this operation every hive is producing it. Bog heather honey requires what the name says: bog heather, intact and undisturbed at flowering. The foraging area on which those 40 to 50 hives depend includes the parcels of bog and bog-margin habitat that the proposed development will excavate for turbine bases, hardstands, internal roads and grid connection trenches, and the construction phase of the development will remove the heather on which the entire production rests. The developer's biodiversity assessment treats pollinators as a generic ecology category. It does not address the loss of a commercial bog heather honey production operation 40 to 50 hives in scale, in the immediate area of the proposed turbines, that depends on the very habitat the works will remove. The commitment locally to enhance and protect the local bee population is testament to the commitment of this community to the natural habitat and the species who thrive here. This is entirely disregarded in the Applicants documents.

On wildlife we live in a place that is genuinely working as habitat. Barn owls hunt across the full extent of the site every evening. From our garden in the evening we watch barn owls coming across from the direction of T02 — the precise approach line of the proposed turbine that will occupy that bearing from our home. The Barn Owls have been disregarded in a desktop review in the Applicants study. We know their line of trajectory, we see them cross the proposed development site and they spend significant time, frequently in the vicinity of T02 at a height that will create with certainty a collision risk. Bats forage on our land and across the site at dusk. The independent ornithological and bat review lodged in the larger Community objection sets out in detail why the developer's survey effort was structurally incapable of properly assessing both species — limited dawn and dusk effort, no acoustic monitoring at proposed turbine positions to a recognised standard, no engagement with the highest-density barn owl breeding area in Ireland that the developer's own scoping evidence places this site within. We want to add a point the developer has not addressed at all. If the bats that currently roost and forage on the proposed site are displaced by construction and operation, they will not disappear. They will move into the buildings still available to them — the homes, sheds and private office buildings of the residents around the site. Bats are protected under Annex IV of the Habitats Directive: their roosts in a private building cannot lawfully be disturbed, and a development that displaces them into residential buildings has not solved a biodiversity problem, it has transferred it onto the people who live next to the development.

The site is also working game habitat. Mallards nest on the site. Wigeons, foxes, rabbits, hares and pheasants use the bog and the field margins year-round. None of this is conveyed in the developer's ecology chapter.

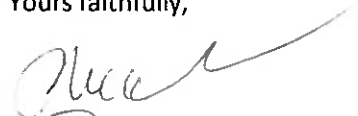
We have legitimate concerns for the financial impact of this development in our future. Working from home will become impossible, businesses will be impacted and all future expansion plans will be shelved and the property value of our home will be massively reduced. This home, and the land and the businesses around it, is our retirement — in the literal financial sense that the mortgage, the development of the retreat centre, and the value of the property all rest on the asset being what it is now. The peer-reviewed literature on wind turbine impacts on rural residential property values is consistent: measurable, statistically significant reductions, strongest in the closest distance band, strongest for tall modern turbines, strongest in rural high-amenity areas. Our home is in the closest distance band. The Ballincor turbines are at the upper end of the tallest category. The amenity character of the area we live in is precisely the character the literature identifies as suffering the greatest impact. Our retirement is built on the asset the literature predicts will lose the most value. On the construction phase, a four-day-a-week home-based job is incompatible with the heavy haulage, the concrete pours, the rural-road traffic disruption, and the temporary fibre/WiFi disruption that this site's construction will produce over a period of years; the developer's assessment of construction-phase impacts on home-based workers in 2026 is absent. Permanent home working is now the norm in the rural midlands. The application has not been written for the country we live in.

The Offaly County Development Plan designates the area within which this site sits as unsuitable for wind energy development. Since the Coolglass ruling that designation carries real weight, and the reasons it was made — landscape sensitivity, ecological designation, the proximity of European sites, the rural residential pattern — apply to our home with full force. The application before the Board has not demonstrated any basis on which that policy should be set aside.

We are asking An Coimisiún Pleanála to refuse permission for this application as submitted. Our home is positioned between an existing wind farm 979 metres on one side and a proposed cluster 1,071 metres on the other, with a stated noise margin that has not been stress-tested against the corrections the developer's own methodology requires, with shadow flicker on 83 days of the year of which the chapter placed before the Board reports 18, with a Substantial visual classification on the developer's own dataset and 8 turbines across two wind farms in a single field of view, with a sauna and retreat business and a 40-to-50-hive bog heather honey operation that cannot operate beside the development as proposed, with barn owls flying nightly across the line of T02, and with the displacement of a protected bat population from the site into the residential buildings the developer's own assessment has not addressed. We do not believe this application meets the standard that Article 3 of the EIA Directive (Case C-50/09; Case C-427/07) requires to sustain a grant of planning permission, and we ask the Board to refuse it.

Thank you for considering this submission.

Yours faithfully,




Airidas Dzimidis & Brigita Dzimidienė

AA Saunas

Receptor 68, Ballincor Wind Farm study area, R42 C527