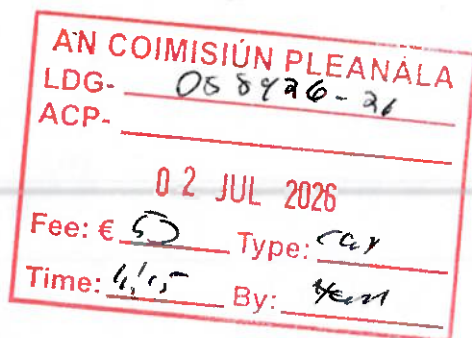




Ann Hassett
Rathbeg
Kilcolman Area
Co. Offaly
R42 CP73

27/06/2026

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Case Ref: Planning Application ABP-PAX 92.324279

Ballincor Wind Farm, Counties Offaly and Tipperary

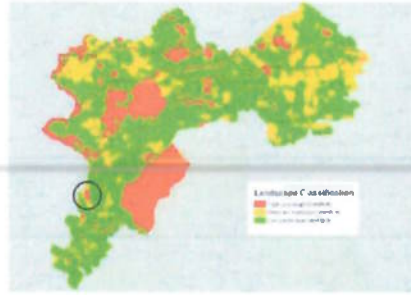
Dear Sir/Madam,

I write on behalf of our household of six adults who live at the above address. We are objecting to the application for the proposed Ballincor Wind Farm and asking the Commission to refuse planning permission. Before setting out our grounds in detail, I want to explain what this house is to us, because without that context the rest of this letter will not fully make sense.

This house is a twenty-year project. It is not an investment or an asset in any abstract sense. It is the thing we have worked toward for the better part of our adult lives. We built here because of what this place is — the quiet of it, the landscape, and the open vista to the natural habitat. I work from home and am here most of every day. One member of the family lives with neurological sensitivities for whom this proposal presents a deep concern.

Our objection centres principally on the landscape character of this area and the visual impact of the proposed development on our home and on the homes of our neighbours. Noise, biodiversity, planning policy and property are dealt with in turn after that.

Landscape Character Assessment



The Applicant erroneously identifies the area as designated in the *"Moderate and Low Sensitivity"* classification category (Ch12 page 24). The Council's own Landscape Sensitivity Map, reproduced above, does not support that characterisation. The area around Sharavogue Bog is classified Red — High sensitivity — and the broader landscape east of the site, where this property and the homes of our neighbours stand, is classified High to Moderate. The Applicant's own documents acknowledge that the site boundary is, in places, ten metres from Sharavogue Bog and that the River Brosna forms a substantial part of the site perimeter.

Notwithstanding, turbines contained just within County Tipperary. A Landscape Sensitivity Assessment was completed for County Offaly and is included within the current Offaly County Development Plan. This divides the landscape of County Offaly into three Landscape Sensitivity Classifications: Low, Moderate, and High Sensitivity. The proposed wind farm lies within the Moderate and Low Sensitivity classifications. Low Sensitivity Areas are described as "predominantly flat and undulating agricultural landscape coupled with a peatland landscape.

Offaly County Council has not granted High sensitivity status lightly. The Sharavogue Bog landscape is the one small area, for miles in every direction, that carries that designation. The Applicant's Landscape and Visual Impact Assessment is built from a starting position — "Moderate and Low" — that the Council's own published mapping contradicts. The Applicants full Visual Impact assessment deliberately starts from the wrong place.

Visual Impact Effects

Our property is identified as Receptor H249 in the developer's documentation. The nearest turbine, T08, would stand 1.62 kilometres from this house. These are 180-metre machines with a 163-metre rotor diameter, proposed on bogland at 42 to 62 metres above sea level. Our home sits at 83.1 metres OD — elevated 32.1 metres above the turbine bases. The critical point is that our eye level sits above the bottom of the blade sweep. We would not be looking up at these machines. We would be looking directly into their rotor plane. That is not a visual nuisance in any ordinary sense. It is living inside the operational envelope of an 11-turbine wind farm.



The image above shows our home and the string of Ballincor turbines, all 11 of them spread from South to North (left to right). See Close up image below for context.



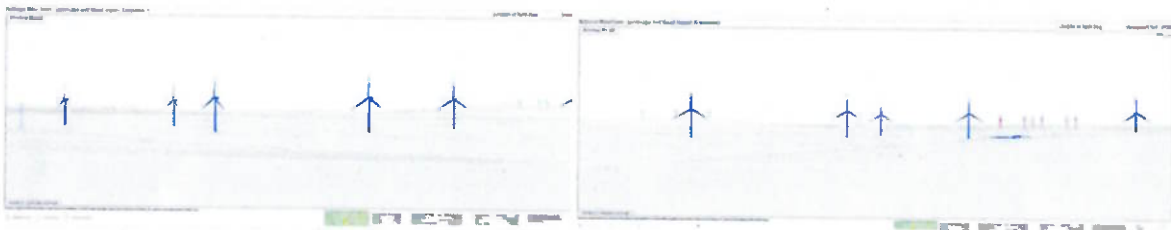
The images below show the Applicants Photomontage image. Typically it only includes half the turbines.



The image below captures Lacka/Skehanagh turbines on the horizon to the right of the image – again only half of those turbines.



When you put the RWE/LVIA Wireframes side by side for this Vantage point you capture the full scale of our view. All 11 Ballincor in blue, the 8 of Lacka/Skehanagh in grey on the horizon and to the right the 7 of Carrig in red.



The Applicant describes this effect as '*dominant but not overbearing*'. In a brief statement on cumulative effect they mention the turbines of Lacka Skehanagh and Carrig and determine: "*Even in combination these two modest scale developments do not contribute to a marked change in landscape character... It will not become a landscape that is defined by wind energy development.*"

I share this view with 11 neighbouring families some are marginally closer to the development than we are. See image below.



RWE concludes their analysis with *"No significant visual effects at any of the 27 VRPs. Only one viewpoint (VP20, at 1 km) reaches the borderline-significant "Substantial-moderate" threshold, with three more at "Moderate" – all within ~2 km of the nearest turbine."*

The images above tell a different story. Eleven turbines, each up to 180 metres in tip height, are strung in a continuous line across the entire visible skyline — not clustered, not overlapped, not contained within a defined envelope, but extended across the full width of the available view. Behind them, the 8 turbines of the operational Lacka/Skehanagh wind farm (less than 3 km away) and the 7 permitted turbines of Carrig (less than 4 km to the north) compound the effect. From my home, and from those of my neighbours, this is not a "working rural landscape" with occasional wind energy precedent, as the LVIA characterises it. It is a landscape on the verge of being defined, dominated, and visually consumed by industrial-scale wind energy development. The Applicant's own conclusion at VP20 — that the turbines will be "dominant but not overbearing" — is contradicted by the photomontage evidence and by the lived experience of residents who will see this development from every window facing the site. The only references in the entire LVIA to the cumulative presence of the 8 Lacka turbines and the 7 Carrig turbines dismiss them as "modest scale developments" that "will not become a landscape that is defined by wind energy development." That conclusion is not credible when 26 turbines (11 proposed + 8 + 7) will be visible in combination or close succession from receptors within a few kilometres of the site.

The fundamental design problem is that the site simply does not have the spatial extent to accommodate eleven turbines of this scale in a favourable layout. The Applicant has been forced into a long linear "string" configuration rather than a contained cluster — a layout dictated not by landscape considerations but by the boundaries of available land, SAC buffer zones and setback constraints. The consequence is that landscape and visual intrusion is maximised rather than minimised: the development breaches the skyline and ridgeline from both the east and the west, creates visual clutter across the full extent of the visible horizon, and removes any possibility of containment or visual relief. A clustered or overlapped layout might have allowed the turbines to read as a single coherent feature; an 11-turbine string in this landscape reads as a wall.

This is the opposite of the Wind Energy Development Guidelines (2006) design guidance which, while permitting "depth" and "grid" layouts in flat peatland landscapes, presupposes a spatial extent sufficient to deliver such a layout. Here, the site has been pushed beyond its capacity, and the LVIA's claim that the layout "responds to the underlying landscape pattern" is a post-hoc rationalisation of a constraint-driven design — a pattern that is repeated, on the same point, across multiple chapters of this EIAR. The landscape character assessment as presented is patently incorrect, and its framing is materially misleading in the way it presents the receiving environment to the Commission.

There is no aspect from this house, no window, no point in the garden, from which a person could look west or south-west or north-west without seeing these structures. The images above show no screening options available to us or to our neighbours. The landscape we chose, the one we spent twenty years working toward, would be gone.

The scale, siting, density and linear configuration of the proposed development create a significant adverse landscape and visual impact on this sensitive rural landscape, and on residential receptors

who have no meaningful means of mitigation. Significant adverse effect cannot be ruled out, and on the LVIA evidence as presented it should be regarded as the more probable outcome.

Shadow Flicker

I wish to raise shadow flicker as a specific and serious concern for my household. Our home is identified as Receptor 249 in RWE's shadow flicker assessment, which records a maximum of 19 minutes in a single day, zero days exceeding the 30-minute threshold, and a worst-case annual total of 9 hours 16 minutes. On those figures, our home appears on no list of concern and a reader of Chapter 16 would reasonably conclude that shadow flicker is not a meaningful issue here. That conclusion is wrong, and RWE's own documents demonstrate why.

RWE's modelling produced a second figure, the total number of days on which any shadow flicker occurs at our home, regardless of duration. That figure is 36 days per year. It sits buried in the technical appendix. In addition, Turbine T9 — located 1,761 metres from our home, only 131 metres outside the assessment boundary RWE itself set — was never modelled at all. Its contribution to shadow flicker at this property is simply unknown because no one calculated it.

These 36 days matter to me in a way the assessment did not consider. I am a nurse, and I suffer from photosensitive migraine. RWE's assessment makes no mention of migraine, no mention of photosensitivity, and contains no consideration of residents with neurological conditions. The 30-minute-per-day and 30-hour-per-year thresholds it relies on are derived from 1990s German administrative planning practice and have no clinical basis whatsoever. They were not set with any medical condition in mind, and they should not be treated as a safety finding.

The clinical research on this is clear and concerning. Minen et al. (2021, *Neurology and Therapy*) established that repeated photosensitive exposure in migraine produces allostatic load — a cumulative lowering of the neurological threshold so that smaller stimuli trigger attacks over time. Chong, Starling and Schwedt (2016, *Cephalalgia*) demonstrated through neuroimaging that persistent interictal photosensitivity is associated with measurable structural changes in cortical thickness that do not reverse when the trigger is removed.

The practical consequence is this: I face 36 mornings each year on which flickering shadow will pass through my windows, every one of them a potential migraine trigger, and every triggered attack contributing to cumulative neurological harm documented in the peer-reviewed literature. RWE's shutdown system offers no protection on these days because none of the events exceed the 30-minute threshold that activates it — the system was not designed for them, and the thresholds it uses were not set with any medical condition in view. Over the 35-year operational life of this development, I am being asked to accept this as a tolerable consequence of living in my own home. I do not accept it. Article 8 of the European Convention on Human Rights protects the right to respect for the home and for private and family life. A development that knowingly exposes a resident with a diagnosed neurological condition to a recurring trigger for that condition, without ever assessing the specific risk to that resident, does not respect that right.

Noise

Our property is assigned to noise monitoring location NML3 in the developer's noise categorisation. The assessor, AWN Consulting, has applied the ETSU-R-97 methodology. What they have not done is apply the JOULE valley correction required under section 4.3.9 of the Institute of Acoustics Good Practice Guide — the methodology the developer itself adopted as governing. The correction is mandatory where the terrain between turbine and receptor dips, creating a concave propagation path that the standard noise model does not capture. The developer's noise chapter contains no trace of this analysis. The same acoustic consultants applied this correction routinely at three other Irish wind farm assessments running concurrently.

Separately, the Offaly County Development Plan at Development Management Standard DMS-109 requires assessment against the WHO Environmental Noise Guidelines (2018). That assessment has not been carried out. No Lden calculations are provided for any receptor, and the submission contains no statement of WHO 2018 consistency anywhere. The background noise survey was conducted entirely in summer — the season of lowest wind speeds in Ireland — so background levels at the wind speeds where compliance is tightest were extrapolated, not measured. Page 2 of the calibration certificate is absent for every one of the seven monitoring instruments deployed; that is the page that records whether each instrument passed its calibration check. Taken together, the noise assessment omits a mandatory correction, does not engage with the noise standard required by the applicable development plan, and rests on instrument calibration evidence that is incomplete on its face. I do not see how it can be accepted as adequate.

I want to explain why noise matters particularly to this household. One member of our family is neurodivergent and sleep is already a significant challenge for them. Another lives with tinnitus. We moved here in part because the ambient noise environment is low — because the quiet of this place is something the daily lives of people in this house genuinely depend on. The peer-reviewed research on infrasound and amplitude modulation from large turbines establishes that the autistic nervous system shows reduced habituation to repetitive non-habituating stimuli, sensory gating deficits, and heightened amygdala activity in response to environmental sound (Nordin et al., 2013; Frontiers in Psychiatry systematic review, 2026). For a person with tinnitus, the addition of a chronic low-frequency source at close range is exactly the auditory environment the research identifies as most damaging. The health chapter of the EIAR does not assess the impact of this development on residents with sensory processing differences or tinnitus, despite both being conditions identified in the literature on wind turbine health effects.

Biodiversity

The living space at the back of our home is a wall of glass, designed as such to capture the view and the wildlife of the area. From that window we have, on occasion, watched the White-tailed Eagle in flight — a Red-listed Annex I species with only around 150 individuals in the wild in the whole country. Their presence here is an indicator of the vitality and richness of a habitat capable of

sustaining them — wetlands, callows, flooded fields and the waterbirds that depend on them. To the north-east of the house we regularly watch large flocks of Whooper Swans on the callows and adjacent flooded fields, sometimes well in excess of the small "occasional" flocks the Applicant's own surveys suggest are typical for this site. We also see geese, plover, lapwing and curlew moving across the landscape between the river corridor and the surrounding fields, often at dawn and dusk.

We are very concerned by the Ornithological surveys conducted by the Applicant. We know the frequency, range and amount of birds that visit this site. The data from RWEs bird survey in no way reflects this. When we read further into the Applicants supporting material we discovered major deficiencies and gaps in their survey effort. The Applicant's own documents acknowledge that the highest-density bird activity zone on the site was excluded from the collision risk modelling; that the entire 2022 breeding season is missing from the dataset; that the Greenland White-fronted Goose has effectively zero vantage-point records despite over 100 birds confirmed nearby in the SPA; and that the Black-tailed Godwit collision prediction is, in the modeller's own words, "not robust." Distance under-detection correction factors of up to three times have been acknowledged but not applied to the headline figures. The surveys used to support the Applicant's conclusions are, in our view, demonstrably deficient and cannot reasonably be accepted by the Inspector as a true reflection of the bird life in and around the development site. What we see from our own window — every winter, in numbers — is not what these surveys describe.

A confirmed merlin breeding territory was located 2.8 kilometres from the site by BirdWatch Ireland in 2025 — an Annex I species. The developer's bird survey programme across nine seasons included no nocturnal surveys, no acoustic monitoring and no radar; none of the methods that would have been required to detect this species adequately. A barn owl breeding site was confirmed by the National Parks and Wildlife Service at 75 metres from the site boundary in 2023, and the developer's own assessment acknowledges that standard vantage-point surveys are unlikely to detect this species. No targeted nocturnal survey was carried out for either species.

We rely on the standards that govern the planning process, in particular the standards set for a Strategic Infrastructure Development. We rely on the Commission to apply them. Where the survey effort does not meet those standards, the conclusions the Applicant draws from it cannot be accepted.

Offaly County Development Plan — The Site is Designated Unsuitable

The applicant spends much of their time in Chapter 12 challenging this sites designation as unsuitable for windfarm development. This designation was determined by Offaly County Council after due process, extensive analysis, independent oversight and in full compliance with national guidance on the matter. RWE, a commercial player, spend much of Ch 12 presenting a counter position in the absence of any honest and objective data or analysis. The designation exists for reasons that this application illustrates clearly: the landscape sensitivity of this area, the ecological constraints on and around the site and the proximity of existing residences in elevated positions that

have no meaningful screening from the proposed turbines. The CDP designation should be determinative, and the failure to engage with it seriously is itself a reason to refuse.

Finally to say we have invested our life savings in this property. It has been a long 20 year journey and it is everything we have. I am not in a position to commission a surveyor's report on the effect of an 11-turbine wind farm at 1.62 kilometres on the value of a property of this kind, and I am not going to pretend that the property value evidence is settled or simple. But it would not be honest to leave it out. The University of Galway's 2023 study by Gillespie and McHale, found statistically significant negative effects on house prices near wind turbines in Ireland. The international research consistently identifies the strongest effects for rural detached properties within close range. This house, in its current setting, with its current views and its current acoustic environment, represents our entire financial commitment as a household. If this development proceeds, that setting changes fundamentally and irreversibly. I think that is a legitimate matter for the inspector to weigh alongside everything else.

Conclusion

We are asking An Coimisiún Pleanála to refuse this application. The noise assessment is materially deficient, the ornithological surveys are inadequate, the ecological assessment leaves real questions unanswered. The site is designated as unsuitable in the County Development Plan, and following Coolglass the burden of justifying departure from that designation has not been met.

Behind all of that is a household that built a home in a particular place for particular reasons — the landscape, the quiet, the birds, the peace — and that is now facing the prospect of losing all of those things permanently. We respectfully ask that planning permission be refused.

Yours faithfully,



Ann Hassett

On behalf of the household of six adults at Rathbeg, Kilcolman