

# **Formal Objection to Proposed Ballincor Wind Farm**

Birr Outdoor Education & Training Centre (Birr OETC)

Birr, Co. Offaly

18<sup>th</sup> May 2026

Re: Objection to Proposed Ballincor Wind Farm (Planning Ref: PA X92.324279)

To Whom It May Concern,

## **1. Who We Are and Our Connection to the River**

I am writing on behalf of Birr Outdoor Education & Training Centre (Birr OETC) to formally object to the proposed Ballincor Wind Farm.

Birr OETC is a long-established outdoor education centre delivering programmes to schools, youth groups, and community organisations. Our work is centred on the River Brosna and its surrounding landscape, which functions as a living classroom. This environment is fundamental—not incidental—to our activities.

We bring young people of all ages into this setting for kayaking, water safety, environmental education, and personal development. The natural landscape is central to achieving these outcomes.

## **2. Established Use of the River and Amenity**

Our centre has an established, ongoing use of the river corridor and surrounding lands for:

- Kayaking and canoeing
- Nature trails and biodiversity education
- Outdoor and experiential learning programmes
- Wellbeing and youth development

|                          |         |
|--------------------------|---------|
| AN COMMISSIONER PLANNING |         |
| LDG-                     | 000 864 |
| ACP-                     |         |
| 02 JUL 2026              |         |
| Fee: €                   | 5       |
| Type:                    | com     |
| Time:                    | 11/15   |
| By:                      | 24/07   |

This is not a passive or occasional use—it is structured, regular, and essential to our service delivery. The amenity value of this landscape is therefore both real and demonstrable, and must be afforded protection within the planning process.

### **3. Educational and Social Value (Material Planning Consideration)**

The natural characteristics of this environment are inseparable from its educational value.

The Planning and Development Act 2000 (as amended) requires that the planning authority consider the proper planning and sustainable development of the area, including amenity, environment, and social infrastructure.

Our programmes deliver:

- Environmental awareness and stewardship
- Physical and mental wellbeing benefits
- Social development and confidence-building

The introduction of large-scale turbines (circa 180m) would introduce:

- Visual dominance across a currently rural landscape
- Ongoing turbine noise
- A strong industrial presence

These impacts materially reduce the value of the area for outdoor education and recreation and therefore must be considered a significant adverse effect on amenity.

### **4. Ecological and Environmental Sensitivity**

The river corridor and surrounding lands are part of a wider ecological network and include areas of conservation importance, including Special Protection Areas (SPAs).

Under the EU Birds Directive and Habitats Directive, and transposed Irish legislation, there is a clear obligation to:

- Avoid deterioration of protected habitats
- Prevent disturbance to protected species

Wind farm developments are widely recognised to cause:

- Bird and bat displacement

- Habitat fragmentation
- Collision risks and biodiversity loss

In this context, any development must pass the Appropriate Assessment test, demonstrating beyond reasonable scientific doubt that it will not adversely affect the integrity of protected sites.

Given the scale of this proposal, there is a real and legitimate concern that such impacts cannot be fully mitigated.

## **5. Specific Impacts on Use and Operation**

The proposed development would directly impact our ability to operate:

- Noise Impact: Turbine noise would affect the quiet, reflective environment required for river-based learning
- Visual Impact: 180m structures would dominate views and fundamentally alter the landscape character
- Construction Disturbance: Potential for sediment runoff, water quality issues, and disruption to river use
- Biodiversity Loss: Reduced wildlife presence affecting educational programmes
- Amenity Loss: Permanent degradation of the natural setting

These impacts would result in a measurable reduction in the quality and viability of our programmes, which is a material planning concern.

## **6. Planning Policy and Zoning Conflict**

This proposal must be assessed against key planning frameworks:

National Planning Framework (NPF)

- Supports renewable energy but requires appropriate siting
- Emphasises protection of rural amenities, landscapes, and environmental assets

Offaly and Tipperary County Development Plans

- Identify areas unsuitable for wind energy development
- Protect:
  - ✓ Landscape character
  - ✓ Biodiversity corridors
  - ✓ Recreational and amenity uses

Where a development conflicts with the Development Plan, this must be fully justified. In this case, the scale, siting, and impact raise serious concerns regarding compliance.

## **7. Rights of Access, Recreation and Green Infrastructure**

The River Brosna corridor forms part of a broader green infrastructure network, supporting:

- ✓ Outdoor recreation
- ✓ Environmental education
- ✓ Sustainable tourism
- ✓ Community wellbeing

National and regional planning policy strongly supports:

- ✓ Retention of accessible natural amenities
- ✓ Protection of blueway/river corridors
- ✓ Development of outdoor recreation as a public good

Our centre's use of this area represents a legitimate and policy-aligned use, and any development that undermines this function conflicts with stated national objectives.

## **8. Closing Position**

Birr OETC wishes to make it clear that this is **not an objection to renewable energy as a principle**. We support Ireland's transition to sustainable energy.

However, planning policy is clear—the right development must be in the right place.

In this instance:

- The location is environmentally sensitive
- The landscape is actively used for education and recreation
- The amenity value is high and established
- The impacts are significant and long-term

The proposed development would result in a permanent and unacceptable loss of amenity, educational value, and environmental quality.

We respectfully request that An Coimisiún Pleanála:

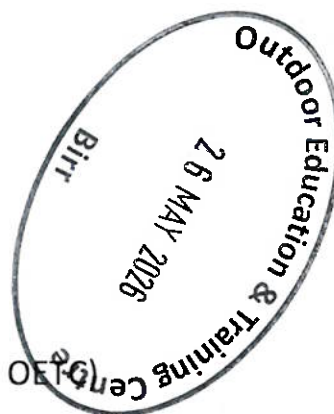
- Give full weight to the educational, recreational, and environmental value of this area
- Recognise the material impact on an established outdoor education provider
- Refuse permission for this development in the interests of proper planning and sustainable development

Yours sincerely,



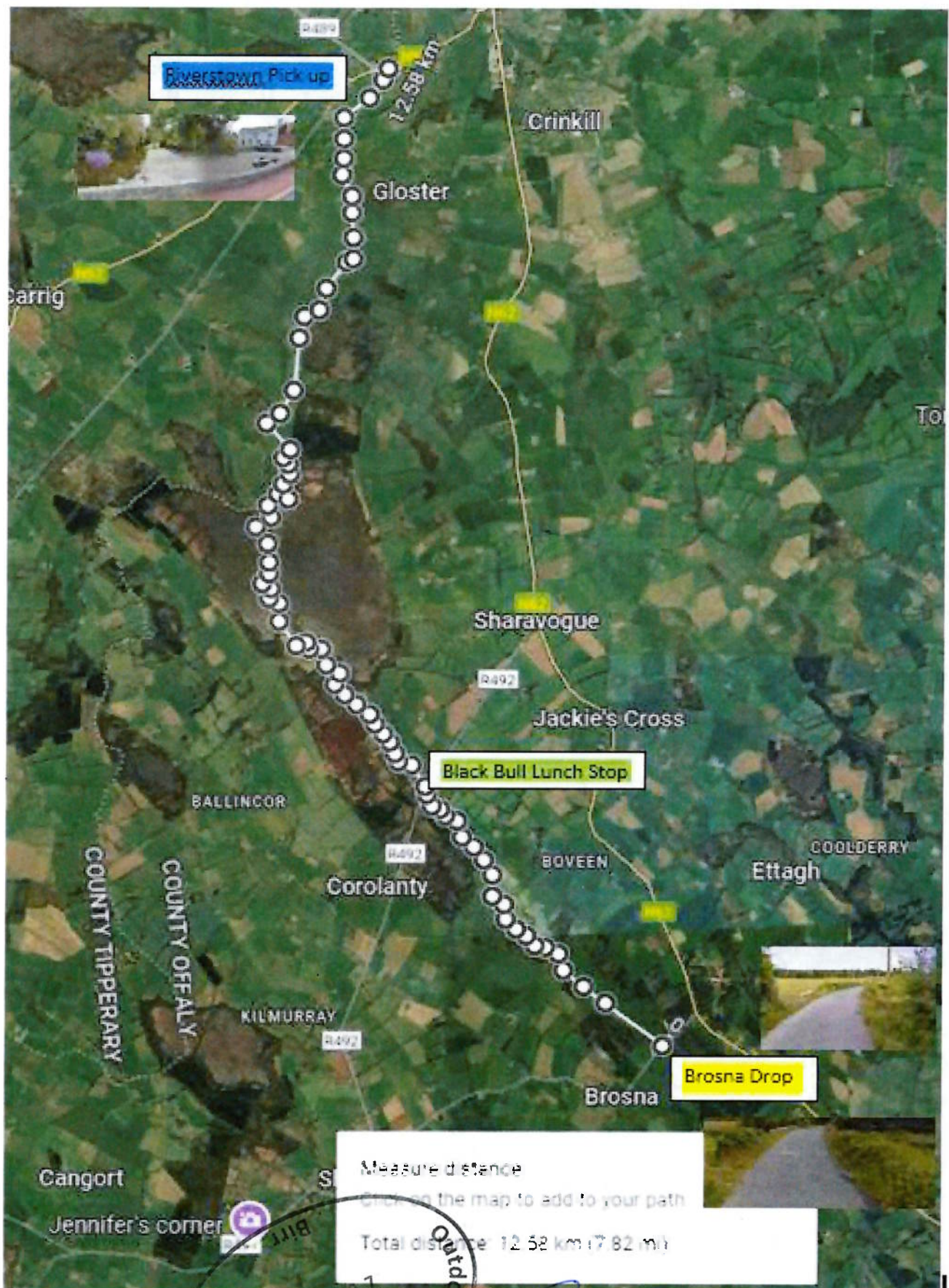
Mary Clarke  
Centre Manager

Birr Outdoor Education & Training Centre (Birr OETC)





Little Brosna River Trip



Outdoor Education & Training Centre  
26 MAY 2026

*Ray O'K*  
26/5/26

## Birr OETC Canoeing Trip Preparation List

|                                                                                                                                                               |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Group Name<br>Date<br>Number in total inc group leaders & Instructors<br>Location drop off<br>Location pick up<br>Transport Confirmed<br>Where are the canoes |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------|--|

| Staff Brief Discussed in 9am Meeting                       | Tick | Explain if necessary |
|------------------------------------------------------------|------|----------------------|
| Weather                                                    |      |                      |
| Map and route to be taken in pouch & in Office             |      |                      |
| Canoes required                                            |      |                      |
| Paddles Required                                           |      |                      |
| Sticks & Rubber & Straps & Extra                           |      |                      |
| Lunchs Packed in Barrels                                   |      |                      |
| First Aid Checked & Packed                                 |      |                      |
| All safety Personal gear on staff & Group                  |      |                      |
| Hot drinks & Cold drinks                                   |      |                      |
| Ensure all phones numbers are shared                       |      |                      |
| Phone per boat in case                                     |      |                      |
| Kisu/Tarp/Botty per boat                                   |      |                      |
| Rain Jacket/Hats/Poncho                                    |      |                      |
| Fire Making equipment                                      |      |                      |
| Torch                                                      |      |                      |
| Sweets/Chocolate                                           |      |                      |
| Saw for trees                                              |      |                      |
| Group Medication                                           |      |                      |
| Estimate time to return if possible                        |      |                      |
| Plan on meeting bus with food, what to bring and what time |      |                      |
| <b>Stay together as a whole group</b>                      |      |                      |
| <b>If in doubt do not go out</b>                           |      |                      |

|                             |                  |
|-----------------------------|------------------|
| Staff in charge of the trip | 1<br>2<br>3<br>4 |
| Extra Notes                 |                  |