

AN COIMISIÚN PLEANÁLA
LDG- 288942
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02 JUL 2026
Fee: € 5 Type: CA7
Time: MT By: Len

Carmel, Bernard & Damian Larkin
Lacka
Carrig
Birr
Co. Offaly
R42R260

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

25th June 2026

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

Receptor 275

Dear inspector,

We live at Receptor 275 in the applicant's register, on the south-west side of the proposed Ballincor turbine cluster. We write as community members who alongside our neighbours have made identifiable, sustained commitments to the wildlife and farmed landscape around us. The Community Submission and the input of other members of our community sets out those commitments in detail — the work done on barn owl habitat in this area, the beekeeping carried on by neighbours within the immediate study zone, the long-running protection of fish stocks in the Little Brosna and its tributaries, and the environmental agricultural methods practised on the adjoining farms. We do not repeat that material here. We adopt and incorporate the relevant sections of those submissions and write specifically about what the cumulative position at our property means for the place we live in.

We say at the outset who “we” are, because the documents before the Board reduce this household to a receptor number and a set of predicted decibels, and that is not who lives here. This is a family home. Carmel, the mother of this household, lives here with her sons Bernard and Damian. The Little Brosna is not a line on the developer's drainage map to us; it is the river nearby, the river we kayak, the river whose bank holds the memorial to the son and brother we lost. There is a memorial plaque at the water's edge that this family visits, a place that is private, particular and irreplaceable to us. It sits beside the line of proposed turbine T3, on the very ground where the developer proposes to run a drain and an access roadway. The Board is asked to hold that in mind when it reads the paragraphs that follow about “everyday agricultural land” and “Medium-low sensitivity.”

The summary of our position is simple. Our home sits inside the combined visual, acoustic and shadow envelope of three wind farms: the existing Lacka/ Knockshewowna development on the hill to the front, the proposed Ballincor cluster to the left, and the permitted Carrig Renewables development to the right of our home. We are 1,574 metres from the nearest existing Knockshewowna turbine and 1,430 metres from the nearest proposed Ballincor turbine (T03). 22 wind turbines will be visible from our property when Ballincor is built and Carrig is operational.

Section 16.2.5 of EIA Chapter 16 states, of the proposed Ballincor development: *"There is no potential for overlap of the same receptor with any other proposed or operational wind farm developments."* That statement, applied to our property, is incorrect. The applicant's own Chapter 4 of the EIA records Carrig (Lacka) Wind Farm at approximately 1.7 km from the Ballincor site, well within the 2 km cumulative threshold that the IWEA Best Practice Guidelines — cited by the applicant — require for cumulative shadow flicker assessment. An independent coordinate check identifies Knockshewowna turbines as close as 1,724 metres from T03. Our home sits between the two existing/permited developments and the proposed third. The applicant's position that no cumulative overlap exists is, in respect of our property and in respect of the 32 sensitive properties the independent community review identifies as falling within the combined Ballincor–Knockshewowna shadow zone, an unexamined assumption presented as fact.

The same pattern recurs in the noise assessment. AWN, the applicant's noise consultant, predicts a cumulative night-time level at our home of 37.0 dB LA90 against the 43.0 dB criterion — a 6.0 dB margin. We are not, on those figures, a worst-case noise property. We do not pretend otherwise. The significance of our home for noise is not its single-development margin. It is its cumulative position. AWN's own model produces predicted night-time exceedances of +1.0 to +2.2 dB at five non-stakeholder properties comparable to ours, in the same combined noise field of three developments. AWN dismisses those exceedances by invoking IoA Good Practice Guide §5.1.5 — a scoping rule that governs the geographical extent of acoustic modelling and does not discharge the obligation under the EIA Directive to assess the noise that residents will actually experience from the combined operation of surrounding wind farms. A property in a three-wind-farm combined field, with predicted exceedances at its peers, that has been removed from the cumulative analysis by means of a scoping rule, has not been honestly assessed for noise. It has been excluded from assessment.

A member of this family lives with sleep apnoea, a condition whose management depends on uninterrupted, settled sleep, and the family experiences anxiety and the wider effects on mental health that come with the prospect of living, indefinitely, inside the combined acoustic field of three wind farms. Night-time noise from wind turbines is not assessed by the EIA Directive as a theoretical number; it is assessed because of what it does to the people who have to sleep underneath it. A cumulative night-time field that the developer has declined to model in full, in a home where one resident's health already depends on undisturbed sleep, is precisely the kind of effect the Directive requires to be assessed and the kind this application has not assessed. The exclusion of our property from the cumulative analysis is not a neutral modelling decision. It writes a real and foreseeable health effect on this family out of the assessment.

On shadow flicker the picture is sharper still. Table 16-1 of Chapter 16 records 0 days exceeding the 30-minute threshold at this property — a figure that any planning authority reading the chapter in good faith would understand as "this property is unaffected." The applicant's own Appendix 16-1 records 30 days of shadow flicker per year at this property. One day in roughly every twelve, every year, for the 25-to-35-year operational life of the development, our home will experience shadow flicker cast by the Ballincor turbines — and none of it appears in the chapter placed before the Board. The applicant's shutdown system is calibrated to the 30-minute daily threshold; on the days where Ballincor casts shadow for less than that, no mitigation operates. And because the cumulative assessment was never performed, the same residual flicker from Knockshegowna in the afternoons — when Ballincor casts in the mornings — has no shutdown system at all. We will sit in the path of shadow from two wind farms, in opposing directions, on the same day, without any of it being modelled or mitigated.

The view from our property today already includes the eight Knockshegowna turbines on the hill to the south-west. That is the wind farm the community lived with when it was built — 8 turbines on elevated ground at 127 to 154 metres above sea level, sitting where the conventional mental image of a wind farm puts them, on a distant hill, occupying a portion of the horizon. We did not object to Knockshegowna. We have lived with it. The visual experience proposed at Ballincor is different in kind. The Ballincor turbines will stand at 185 metres tip height on flat bogland at roughly 50 metres above sea level. They will not sit on a hill behind us. They will sit beside us, on open bogland, towering above the surrounding landscape, with no topographic backdrop to soften their geometry. The rotor diameter alone is 163 metres — longer than the height of a fifty-storey building. There is no distance at which structures of that scale, on ground that flat, become small.

No photomontage in the entire application shows the simultaneous combined view our family will live with — Knockshegowna in one direction, Ballincor across the open bogland in another, and Carrig appearing on the other side as it comes online. The developer's LVIA assesses cumulative impact against each other wind farm individually. It does not present, from any viewpoint, the actual experience of three wind farms in a single field of view. From the Cronckill viewpoint, that is the experience. The 22 turbines in our combined visibility are a known and real prospect.

The Offaly County Development Plan Wind Energy Strategy designates this area — on the planning authority's own map — as unsuitable for wind energy development on grounds of "significant environmental, heritage and landscape constraints." That designation pre-dates the application. The developer's LVIA rates most of the closest residential receptors, including ours, at "Medium-low" visual sensitivity on the basis that the surrounding landscape is "everyday" working agricultural land. The CDP itself, on the same landscape, identifies it as carrying environmental, heritage and landscape constraints of a kind that make the area unsuitable for this development. The developer's "Medium-low" rating and the planning authority's designation of the same ground cannot both be correct. The CDP is the document of the competent authority. The developer's rating is the document of a commercial developer with deep financial incentive. We invite the Board to give weight to its own planning authority's assessment of the landscape we live in.

The Little Brosna, the Croneen trout, and a river the developer never named

The Little Brosna River runs along the boundary of the proposed wind farm site and receives drainage from all nine turbine drainage areas. The river is rated under the Water Framework Directive at Poor status for 2019–2024 and is at Risk of failing to achieve Good status by 2027. The proposed development was assessed throughout EIAR Chapter 9 against a Moderate baseline. Appendix 9-1 of the application correctly records the Little Brosna 040 River Waterbody as Poor and then delegates the WFD compliance conclusion back to Chapter 9, which uses Moderate. The compliance assessment for every aquatic species in this catchment is built on a baseline status that the developer's own appendix already records as wrong. Under Article 4(1) of the Water Framework Directive, no further deterioration is permitted from an already-Poor waterbody. Whether construction-phase impacts would cause deterioration from Poor has not been assessed anywhere in the application, for the simple reason that the assessment used the wrong baseline.

The Little Brosna and its tributary the Camcor host a genetically distinct sub-population of wild brown trout — the **Croneen**. This is not an angling enthusiasm. The Croneen brown trout sub-population is identified by Inland Fisheries Ireland through formal genetic analysis as distinct from the general Little Brosna stock, is designated as a specific survey reach within the IFI National Electrofishing Programme, and is documented as a management priority in the IFI Little Brosna Catchment Factsheet, available without restriction on the IFI website. Brown trout is an Annex V species under the Habitats Directive. A genetically distinct sub-population is, in conservation terms, an irreplaceable lineage: if it is lost, it cannot be reconstituted from the general catchment stock. **The word "Croneen" does not appear in EIAR Chapter 6, in Appendix 6-3, or in the Natura impact Statement.** The IFI catchment factsheet does not appear in the desktop review references. No electrofishing site was placed on the Croneen reach. The genetic distinctiveness of the population is nowhere acknowledged. The most identifiable aquatic conservation feature of the catchment in which this development sits has been missed in its entirety.

Inland Fisheries Ireland's own published material identifies the Brosna river system as carrying **an exceptionally heavy hatch of giant mayfly (*Ephemera danica*)** of a density unusual for an Irish river — these hatches are globally famous on the great limestone loughs (Derg, Corrib, Sheelin), and it is rare for an Irish river to see hatches at this density, which makes the Brosna a unique river-angling exception. The same source identifies the Croneen brown trout strain as the species whose summer feeding behaviour on those mayflies makes the interaction between the unique trout and the unique hatch *"highly specific to this catchment."* The literature on rare Irish mayflies separately identifies the March Brown (*Rhythrogena germanica*) and the Yellow Hawk (*Ephemerella* species) as scarce hatches of national interest. None of these features — the mayfly hatch density, the trout sub-population, the species-specific catchment interaction — is named in the EIAR or the NIS. The applicant's ecology desk study did not identify what Inland Fisheries Ireland's public website identifies on the first page of its catchment factsheet.

The mayfly is the base of the food web in this catchment. It is the principal food source for the trout, and through the trout and the emerging hatch itself, the food source for the migratory and resident

birds that work this river. Remove or degrade the mayfly — through sedimentation of the gravels and silt-beds in which the larvae live for the two years before they hatch, through the construction-phase discharges set out below, through alteration of the river's flow and bed — and the loss does not stop at an insect. It runs up through the trout, including the Croneen, and up again through the birds. A river assessment that never names the base species of the ecosystem cannot have assessed an impact on the species that depend on it. The single most important food-web element in this catchment is absent from the developer's assessment of the catchment.

We add what this family knows from living beside this river, because it contradicts the developer's record directly. There is an active otter holt on the riverbank near one of the Turbines. We say active and we say it with certainty: it is in use, and it has not been identified anywhere in the developer's otter survey. Otter is an Annex II species under the Habitats Directive, and the omission of a known active holt — at a turbine location — from an Appropriate Assessment is not a survey detail; it is a failure of the survey on which the whole AA conclusion for otter rests. There is also a cormorant nest at the location of proposed turbine T8, on the Reids' land, again unrecorded in the application. The river and its banks within and beside the turbine cluster carry kingfisher, cuckoo, curlew, buzzard, woodpecker, pheasant and widgeon; and on the land and banks, red squirrel, mink and hares. We have watched these animals from the river for years. The point is not that we are better surveyors than the developer's consultants. The point is that the most basic, locally-known wildlife features of this stretch of river — an active otter holt at a turbine, a cormorant nest at a turbine, kingfisher and curlew on the water — are absent from a survey effort that was supposed to find exactly these things, and the conclusions of no significant effect were reached without them.

Two further effects on the fishery concern this family directly, and neither is assessed. First, vibration. The construction and operation of turbines on this ground, and the works in and around the watercourses, will transmit vibration into the river. Fish navigate, hold station and select spawning gravels by reference to a stable physical environment, and salmon and trout spawning grounds are sensitive to disturbance of exactly this kind. The application contains no assessment of construction or operational vibration on fish navigation or on the spawning grounds of the catchment. Second, access. The new and upgraded access tracks the developer proposes to drive through this landscape do not only carry construction traffic; they open up previously difficult stretches of riverbank to far easier access on foot, including for unlicensed and unregulated fishing. A river already carrying a genetically distinct trout sub-population and a fish stock this family and its neighbours have protected for years does not need its banks made more accessible to poaching. The cumulative pressure on the fishery — sedimentation, vibration, and newly opened access — is a foreseeable consequence of the development that the application does not address.

The consequences cascade through the rest of the aquatic assessment. Every aquatic survey was conducted in July or August base-flow conditions. Atlantic salmon — Annex II of the Habitats Directive — return upriver to spawn between October and January, the high-flow, high-flood-risk season. Sea lamprey migrate in spring. River lamprey migrate in autumn and winter. Silver eel — Critically Endangered on the IUCN Red List, the subject of the EC Recovery Regulation — migrate downstream in autumn. None of these species were surveyed during their critical seasons. The developer then uses

the absence of records during summer base flow as evidence that the species are not significantly present. That is not a conclusion that any independent aquatic ecologist would accept, and IFI's own scoping requirement directed the developer to assess "Atlantic salmon" and "lamprey species" by reference to their actual life-history requirements. That requirement was acknowledged in the EIA and not implemented.

Turbines T1, T2 and T8, T9 sit, on the developer's own Flood Risk Assessment (Appendix 9-3), in a Flood Zone. The Surface Water Management Plan relies on settlement ponds and silt traps positioned in their vicinity — features which, under those flood conditions, are submerged and reversed. The accumulated construction sediment they were placed to retain is discharged directly into the Little Brosna at peak flow — precisely when Atlantic salmon are migrating and spawning. No assessment of that interaction exists anywhere in the submitted documents. The conclusion that residual impacts on salmon will not be significant, given mitigation, is reached without addressing the failure mode of the mitigation under the flood conditions the developer's own FRA confirms will occur. The 14 culvert crossings of drainage channels within the wind farm boundary receive no individual fish-passage analysis. IFI explicitly required careful planning of watercourse crossings. The requirement was acknowledged in Table 6-1 of the EIA and not implemented. White-clawed crayfish — Annex II — were assessed by daytime visual search, the lowest-sensitivity method for a predominantly nocturnal species, despite confirmed records at a site 4 km downstream in the same waterbody as recently as 2021.

What the LVIA calls "everyday agricultural land"

The developer's LVIA describes the agricultural land around our home as "everyday" working farmland. The neighbours who farm it would not recognise that description, and neither would the wildlife the land supports. Our neighbours and ourselves have long been committed to the habitat and biodiversity of this area. Schemes and initiatives include the planting and retention of hedgerows that the new agri-environmental schemes have only recently begun to reward; the maintenance of field margins and watercourse buffers that filter sediment and pesticide drift out of the runoff that ultimately reaches the Little Brosna; the active management of grassland for invertebrate diversity; the beekeeping enterprises maintained within the immediate area of the proposed turbines, which depend on intact pollinator habitat and on the absence of the operational disturbance these structures will introduce; and the local protection of brown trout fishing on the watercourses we have just described. There is also the matter, set out in the OWLS submission lodged with this objection, of the confirmed breeding barn owl nest 75 metres from the wind farm boundary, and of the dead barn owl found in October 2025 approximately 50 metres from the boundary and 160 metres from a proposed turbine — neither of which has triggered any meaningful reassessment in the application of collision risk to a Red-listed Annex I species that the applicant's own consultant identified as nationally important and then assessed as County importance.

The same disregard runs through the treatment of the more common mammals on this land. Hares are everywhere here — we see them constantly across these fields — and the application makes no meaningful reference to them. Red squirrel, which we have recorded on the river bank, is likewise

disregarded. The Irish hare is a protected species and a species of conservation concern, and red squirrel is a species the State is actively working to protect against displacement. To live on this land is to know that it is not empty "everyday" farmland but ground that carries these animals daily; to read the application is to find them written out of the picture. A development cannot honestly assess its effect on species it has declined to acknowledge are present.

The point is not that any one of these features is, on its own, decisive. The point is that "everyday working agricultural land" is the wrong category for this place. The land is the product of sustained, identifiable, named work by sustained, identifiable, named neighbours, none of which the Application acknowledges or addresses. The Offaly County Development Plan identifies the same land as carrying significant environmental, heritage and landscape constraints. The applicant's sensitivity rating describes the developer's view of our community. The CDP describes the planning authority's view of it. We ask the Board to give weight to the latter.

There is, finally, the matter of construction, which the application treats as a temporary inconvenience and which for this household is neither temporary in feel nor a single event. The Carrig development one side of our home is permitted; the Ballincor development at the other side is now sought. If both proceed, this family faces the prospect of two wind farms under construction at the same time, on the roads around a single home — the heavy plant, the abnormal loads, the turbine-component deliveries, the construction traffic of two major developments converging on the same narrow rural network at the same time. The application's traffic and construction management treats Ballincor in isolation. It does not assess what it means to live, for the construction period, encircled by the simultaneous building of two wind farms. For a household already carrying anxiety about what is being proposed, already managing a member's health that depends on settled conditions, this is not an abstraction. The cumulative burden the developer has declined to assess for noise and shadow it has also declined to assess for the construction phase, and it falls on the same family in the same home.

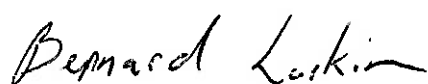
We are asking the Board to refuse permission for this application as submitted.

The Offaly CDP designates the landscape we live in as unsuitable for wind energy development because it is. The developer's "Medium-low" sensitivity rating cannot stand against the planning authority's own land-use designation. Our property sits in the catchment of the Little Brosna, a Water Framework Directive waterbody at Poor status — assessed throughout the application as Moderate. The catchment supports the Croneen brown trout sub-population, a genetically distinct lineage of national conservation significance that is named in Inland Fisheries Ireland's freely available catchment factsheet and not named once in the developer's 6,000-page application. It supports the exceptional *Ephemera danica* mayfly hatch that IFI itself identifies as a unique Irish river-angling feature. It supports Atlantic salmon, river lamprey, brook lamprey, sea lamprey, European eel (Critically Endangered), and probably white-clawed crayfish — none of them surveyed during the critical seasons of their life cycles. The risk of construction-phase sedimentation discharged into the Little Brosna at peak flow under the flood conditions the developer's own FRA confirms will occur has not been assessed against any of those species.

These findings, taken together, do not describe a development that meets the standard of complete, precise and definitive assessment required by Article 6(3) of the Habitats Directive (Case C-127/02 Waddenzee; Case C-258/11 Sweetman; Case C-461/17 Holohan) or by Article 3 of the EIA Directive (Case C-50/09; Case C-427/07) to sustain a grant of planning permission. They describe an assessment whose defects all run in the same direction: understating the impact this development will have on the community of people, the catchment of water, the river, the trout, the mayflies, the salmon, the eel, the otter at its holt, the birds on the water, and the network of identifiable habitat features that this place is built around.

If, contrary to that submission, the Board is minded to grant permission, we ask that it not do so without first requiring: (1) a corrected aquatic ecology baseline that names and assesses the Croneen brown trout sub-population, conducts targeted electrofishing on the Croneen reach, and surveys salmon, lamprey and eel during their actual migration and spawning seasons; (2) a corrected WFD assessment using the Poor baseline that the applicant's own Appendix 9-1 records; (3) a re-survey of otter that addresses the active holt at the T1 location and of riverine and riparian birds that addresses the cormorant nest at the T8 location, together with assessment of the mayfly (*Ephemera danica*) hatch as the base food-web species of the catchment; (4) an assessment of construction and operational vibration on fish navigation and on the spawning grounds of the Little Brosna, and of the effect on the fishery of newly opened riverbank access; (5) a cumulative photomontage from our property at Cronekill showing the simultaneous visual experience of Knockshegowna, Ballincor and Carrig; (6) a cumulative noise reassessment that does not exclude in-combination exceedances by means of the §5.1.5 scoping rule, and that addresses the health effects of cumulative night-time noise on the occupants of this home; (7) a cumulative shadow flicker assessment of Ballincor and Knockshegowna in respect of properties between the two; (8) a cumulative construction-phase assessment of the combined traffic and disruption of the Ballincor and Carrig developments proceeding concurrently; and (9) substantive engagement with the planning authority's own designation of this area as unsuitable for wind energy development under the Offaly CDP Wind Energy Strategy.

Yours faithfully,

A handwritten signature in black ink, reading "Bernard Larkin". The signature is written in a cursive, slightly slanted style.

Receptor 275, Ballincor Wind Farm study area