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Cathal Flynn
Sharavogue
Birr
Co. Offaly
R42 X302

23/06/2026

Case Reference: PAX92.324279 — Ballincor Wind Farm, Counties Offaly and Tipperary
Receptor number on RWE map: 254

Dear Inspector,

My name is Cathal Flynn. I live at Sharavogue, Birr, Co. Offaly, in the dwelling the developer has marked as Receptor 254. I am writing in my own right to object to the proposed Ballincor Wind Farm and all associated infrastructure.

I have spent a great deal of my life watching the River Brosna, the callows alongside it, and the bog beyond. I am not a professional ornithologist or fisheries scientist. I am a local person with a long familiarity with the place, the kind of familiarity that comes from being on the river, in the bog, in the fields and out at the margins of the callow, in every season, year after year, with binoculars and patience. What I see is not data in the licensed-survey sense. It is the kind of grounded long-term observation that a six-year survey programme, particularly one that did not go out at night, did not survey the migration windows, and did not look in the right months cannot substitute for. My submission is offered as corroborating observation, and you will find that the picture it paints sits squarely alongside, and helps explain, the most significant gaps in the developer's own assessment.

The place this development is being proposed on is not an empty bog. It is one of the richest stretches of habitat left in this part of Ireland.

The single most important point I can put before this Board is the one the developer's documents seem least able to acknowledge. This stretch of the Little Brosna, with the callows and bog alongside it, is not a marginal piece of background countryside. It is an exceptionally productive, functioning ecosystem.

I have watched a family of otters and a family of swans share the same stretch of river. I have counted ducklings on the callow in numbers that surprise even me. I have frequently observed a White-tailed Eagle pass over the callow, an apex avian predator that does not appear in landscapes that cannot support it. The barn owl population in this area is, on BirdWatch Ireland's own data, the highest density anywhere in the country. The reason an apex predator and a recovering barn owl population can both be here at the same time is not a coincidence. They are here because the prey base supports them. The prey base is the system. The system is what this development would dismantle.

Where you see a predator and you see the survivors thriving alongside it. Where you see an otter family and a swan family on the same river, with cygnets and ducklings on the water, what you are looking at is nature as it should be. No species in catastrophic collapse. No silent

stretches. This is increasingly rare in the Irish midlands. Decades of farm intensification have forced wildlife into corridors and the Little Brosna corridor is now disproportionately important as one of the surviving refuges. To place an industrial development of this scale through the middle of a refuge is to remove the very characteristic that has allowed the populations to recover here in the first place.

Below, I set out specific observations I have made, birds, fish, mammals and in each case I explain why what I have seen with my own eyes points to a gap in what the developer presented to this Board.

Pintail — a June pair on the Brosna, in a survey programme that was designed not to see them

On 5 June 2025 I observed a pair of Pintail on the Little Brosna. I noted it at the time. A Pintail pair in June is very unusual. Pintail are a migratory species that breeds in Iceland and Scandinavia. The fact that a pair would remain on the Brosna into June, rather than return north to breed in their normal range, is, in my reading of it, a direct reflection of the quality of the feeding habitat and the suitability of this section of river for them.

This raises two notable points:

First, Pintail is a named Special Conservation Interest of the River Little Brosna Callows SPA. The SPA conservation objective is to maintain the population in favourable condition. The recent four-year mean peak count at the SPA is 438 birds on BirdWatch Ireland's I-WeBS dataset, well up on the baseline of 130 in the original site synopsis. This is a species that, on the SPA's most recent figures, is doing better than it was and the area immediately around the proposed development is part of the habitat that supports that recovery.

Second, the developer's own bird survey programme for Ballincor treats Pintail solely as a winter visitor. Their baseline records for the species are confined to the winter season, including a flock of approximately 200 Pintail in March 2024 recorded in the developer's own EIAR, ten times the national importance threshold of 20 birds, and a further flock of 34 birds in March 2026 at the same location, also above the national importance threshold. The developer characterised the 200-bird flock as "a one-off event." A second nationally important flock recorded at the same location in the same month two years later is not a one-off event. It is a recurring pattern that the developer's own survey methodology, concentrating on winter and ignoring the breeding and post-breeding window, was incapable of mapping properly.

My June 2025 observation falls outside the developer's survey window entirely. It is a single record, not a count, and I offer it for what it is. But a Pintail pair on the Brosna in June, alongside two confirmed nationally important flocks in March in two separate years, is consistent with a picture the developer's surveys were never going to capture: that the area immediately around the proposed development is being used as a feeding habitat by a SPA-qualifying species. That changes the assessment. The assessment has not been done.

Shoveler, Wigeon, Teal and the other waterbirds — feeding here because the food is here

The same Pintail point applies more broadly. Shoveler (*Spatula clypeata*), a Red-listed species and another Special Conservation Interest of the same SPA, is documented as a regular user of the Little Brosna callows on the I-WeBS record, with a SPA mean peak of approximately 358 birds and single survey peaks approaching 600. The developer excluded Shoveler from the individual collision risk model on the basis of fewer than ten records during their own survey period. In my view of how birds use this corridor, the developer's survey programme was simply not looking in the right places at the right times to detect this species at its actual abundance.

Five SPA qualifying-interest species — Lapwing, Wigeon, Teal, Shoveler and Black-tailed Godwit, are recorded in the relevant I-WeBS data at mean peak counts running into the thousands. The developer ran individual assessments for three of them and excluded two (Teal and Shoveler) from individual collision modelling. The reasoning given is “fewer than ten records during the survey period.”, the conclusion being that these species do not require individual assessment. The more honest conclusion, in my long observation of this corridor, is that the survey programme was not designed to detect them when and where they actually use it. The food is here. The birds are here. They are here in numbers that matter for a SPA whose conservation objective is to maintain favourable condition.

Barn Owl — thriving here, on a thin national population, for one reason

The barn owl is doing well in this area. I see them. My neighbours see them. There are owl boxes across the area, and within the last few weeks a barn owl has been confirmed nesting very close to us. The developer's own documents record a confirmed barn owl nest 160 metres from one of the proposed turbines, with a further confirmed nest at 600 metres and eight known nest sites within 5 km. The total Irish barn owl population is, on the most recent estimates, between 562 and 702 breeding pairs. That a nest 160 metres from a proposed industrial turbine represents one of fewer than seven hundred barn owl nests in the entire country.

The reason the barn owl is thriving here is not luck. It is the prey base. Barn owls are a top-end indicator of small-mammal abundance, woodland-edge structure, and undisturbed bog. The fact that the species is recovering here, in the highest density anywhere in the country, is once again, a direct reflection of the system as a whole. The system that this development is being built through the middle of.

What the developer did, across a six-year survey period, was zero nocturnal survey work on this nocturnal species. No acoustic monitoring. No call loggers. No dawn or dusk transects. Not one night-time vantage point watch. The developer's own report acknowledges that daytime vantage-point surveys cannot reliably detect a nocturnal species and then concludes that collision risk for that species is “imperceptible” — a conclusion reached, in effect, by not looking. The relevant peer-reviewed science — the 2021 USGS / Ecosphere study by Diffendorfer and colleagues — identifies the barn owl as one of only five raptor species globally at the highest risk of population-level harm from wind turbines. That study is not referenced

anywhere in the developer's assessment. The developer's low-flight argument (that barn owls hunt close to the ground and so do not encounter rotor sweep) ignores commuting flight, the elevated, directional flight between nest and feeding grounds, which is recognised in the CIEEM guidance the developer itself cites as the primary collision-risk vector. A turbine sited between a nest and a feeding area will be in that commuting path, at rotor height, every night for the operational life of this development.

White-tailed Eagle over the callow — what an apex predator's presence tells you about the system

I have frequently seen a White-tailed Eagle pass over the callow. This is not a species that lingers in a degraded landscape. It is an apex avian predator, listed on Annex I of the Birds Directive, and its presence in this part of the country is a direct reflection of the prey base, waterbirds and fish, that the river and the callow corridor support.

I am not asking the Board to treat these sightings as the basis for an Annex I species assessment that the developer never undertook. I am offering it for what it is: confirmation, on the ground, that the system supports the species at the top of the food chain that would not be present unless the rest of the system was working. Apex predators are absent from broken landscapes. This landscape is not broken. The fact that the developer's assessment does not engage with **what** their development would do to that, to the prey base that supports the predator, is one of the deeper gaps in their reasoning.

Otters, swans and ducklings — ecological integrity

I have watched a family of otters work the same stretch of river that a family of swans use to nest and rear their cygnets. The otters have not eliminated the swans. The swans have not been driven off. The ducklings on the callow are present, year on year, in numbers that I have not seen on most other stretches of river I have spent time on. Where you see both an apex predator and the prey thriving on the same water, where there are otters in the bank and there are still ducklings on the surface, you are looking at an ecosystem in functional balance. That is what is at risk here. Not a single species. The integrity of the whole system.

The river itself — Brook Lamprey, Croneen Trout, Salmon

The fish life in this stretch of river is, in my long observation, as exceptional as the bird life on the callow.

I have watched Brook Lamprey spawning underneath Sharavogue Bridge. The spawning at that location is successful and unusually visible. Brook Lamprey spawning on the scale I have seen at Sharavogue is not something I have witnessed on every river I have spent time on. Brook Lamprey is listed on Annex II of the Habitats Directive, requiring designation of Special Areas of Conservation for its habitat. The developer's electrofishing programme captured two lamprey ammocoetes, recorded as Brook Lamprey, in a single July survey on a tributary, with the survey text acknowledging that the larvae could not be differentiated to species level on site. A single July survey is not capable of capturing migration timing for River Lamprey (autumn and winter) or Sea Lamprey (spring), and it is not the right method or the right timing

to capture the scale of Brook Lamprey spawning activity I have personally witnessed downstream of the proposed development. The developer's survey window missed every critical period for every lamprey species in this river.

I have observed trout spawning redds at Sharavogue Bridge and at Riverstown Bridge. The trout sub-population in the Croneen tributary is recognised by Inland Fisheries Ireland as a genetically distinct stock, with its own survey reach under the National Electrofishing Programme and its own management priority status. The word "Croneen" does not appear anywhere in the developer's biodiversity chapter, water chapter, or Natura Impact Statement. This is a population that, if lost to construction-phase sedimentation, cannot be replaced by recolonisation from the general Little Brosna stock. It is genetically irreplaceable. The fact that the developer failed to identify it in a desktop review of a catchment that is well documented in Inland Fisheries Ireland's own publications is, in my view, one of the more remarkable omissions in the entire submission.

I have also observed salmon and trout spawning in the same stretch. The available spawning ground along this river is so limited that the species are using the available redds on top of each other. Salmon numbers in the Little Brosna are already badly down. The remaining spawning habitat is critical. Atlantic Salmon return for spawning between October and January. The developer's electrofishing programme was conducted in July. No salmon were detected. The conclusion drawn is that salmon are not significantly affected. The honest reading is that the surveys were timed to miss them.

Sediment on the spawning grounds, vibration in the water

Two further observations. First, the spawning patches I have watched at Sharavogue and Riverstown are already affected by siltation, patches of redd that should be clean gravel are accumulating fine sediment. Anything that adds to that load - construction runoff, peat disturbance, road wash, concrete-base excavations on the floodplain — will land on the same spawning grounds. The developer's own Flood Risk Assessment confirms that turbines T8 and T9 sit in flood zones. Under flood conditions the sediment-settlement pond system is reversed, discharging accumulated construction sediment directly into the Little Brosna at peak flow. Peak flow on this river coincides with the migration and spawning season for salmon, trout and lamprey. I do not need to be a fisheries scientist to know what that combination produces in the spawning grounds I have watched for years.

Second, I have noticed an exaggerated sense of vibration in the water when significant works are underway nearby. Fish, particularly migratory fish navigating to and from spawning grounds, are sensitive to vibration. The cumulative vibration profile of two years of construction works (piling, excavation, continuous concrete pours, HGV traffic on access tracks running 20 metres from the river edge in places, and then 35 years of operational rotor pulse) is not engaged with anywhere in the developer's submission as a stressor on the river's fish populations. It should be.

The shared issues — the things every household along this river is saying

Mine is one of a number of submissions from this immediate area, including from the household I live in and from neighbours alongside the proposed site. My neighbours, and the community group's technical work, set out the issues with the site itself: the floodplain it sits on; the access track running within 20 metres of the river edge in places; the Sharavogue Bog SAC boundary 10 metres from the proposed development and in active State-funded restoration through more than 400 rewetting dams installed since 2021; the cumulative visual impact of Knockshegowna, Carrig and Ballincor across this single valley; the formal designation of this area in the Offaly County Development Plan Wind Energy Strategy as unsuitable for wind energy on grounds of significant environmental, heritage and landscape constraints; the inadequate consultation; and the direct contradiction between this development and twenty years of State-supported agri-environmental restoration along this river. I do not repeat those points here. I rely on those submissions in full and adopt them as part of my own.

What I want this Board to take from my own submission is one further point. Every one of those structural problems with the application sits on top of a habitat whose ecological richness the developer's submission has, in my view, fundamentally failed to grasp. The combination is what makes this proposal exceptional in the wrong way. A poor site selection in a degraded landscape would be one thing. A poor site selection through the middle of one of the most ecologically productive corridors left in this part of Ireland is something else.

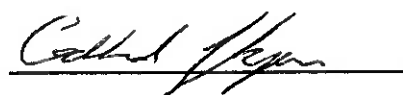
Conclusion

I have offered observations rather than survey data, and I have tried to be honest about what each one is. They are the observations of one local person over a long time on this river and around this bog. They are consistent with the formal evidence: the SPA designations, the I-WeBS counts, the IFI Croneen records, the BirdWatch Ireland barn owl density data, the Annex II protections for the species I have watched and they tell the same story. The story is that this is a thriving, functioning ecosystem of considerable conservation significance, and the developer's documents do not describe a place I recognise.

I respectfully ask An Coimisiún Pleanála to refuse permission for the Ballincor Wind Farm and all its associated infrastructure.

I thank you for taking the time to read my submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Cathal Flynn', written over a horizontal line.

Cathal Flynn