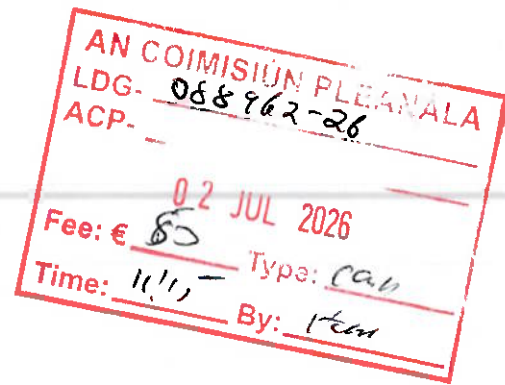


Colman Hogan
Ballyegan
Birr
Co. Offaly
R42 WY95

An Coimisiún Pleanála
32 Marlborough Street
Dublin 1
D01 V902



11 June 2026

**Re: Objection — Planning Application PAX 92.324279 — Ballincor Wind Farm,
County Tipperary/Offaly**

Dear Sir/Madam,

My name is Colman Hogan and I live at Ballyegan, outside Birr in County Offaly. My family has been here since 1969. I have farmed this land all my life, raised my children here, and my grandchildren visit and grow up knowing this place. When I think about what this development would mean, it is that continuity I keep coming back to, we are handing on and what we are taking away. I am asking An Coimisiún Pleanála to refuse permission for the Ballincor Wind Farm, and I want to set out clearly why.

I am writing in respect of two properties in Ballyegan that I own. The first is my own home and my brother Jim lives at the second, in the same townland, and I am making this objection on behalf of both. Jim's property carries Eircode R42 A008 and appears as Receptor 9 in the developer's assessment, at a distance of 1,678 metres from the nearest proposed turbine, T1. My own property, Eircode R42 WY95, does not appear in the developer's receptor register at all as it is outside the 2km boundary. We are in the same townland. Jim's house was identified and assessed — mine was not. It means my home has received no shadow flicker assessment, no noise assessment, and no consideration in any chapter of the EIAR. I am asking the Inspector to note this gap and to give it appropriate weight.

Jim has lived at Ballyegan his whole life. He has particular vulnerabilities that make the potential impacts of this development more acute for him than for most. What I will say is that he is not in a strong position to manage disruption to his home environment, and the chronic, continuous nature of the impacts this development would bring — noise, shadow, visual intrusion — is something that concerns me deeply on his behalf as well as my own.

The strongest argument against this application, in my view, is what it would do to Sharavogue Bog SAC, which sits with its boundary just ten metres from the development site. This is a Priority Habitat under European law and is currently in active State restoration. The developer has not availed of either the Article 6(4) IROPI derogation route or the Article 4.7 Water Framework Directive derogation route. That means the binary legal test applies in full: if the development cannot be shown to have no adverse effect on the integrity of the SAC, it cannot lawfully proceed. I do not believe that test can be passed here. Construction, drainage disruption, peat disturbance, and years of heavy traffic in the immediate proximity of an active raised bog restoration programme cannot be ring-fenced from harm by a line on a map or a list of mitigation measures.

When I was growing up, there were grouse out there, snipe, curlew. The curlew is very scarce now. Every year the children and grandchildren still hear the cuckoo, but I find myself wondering whether that will continue. The frogs are nearly gone — Jim wants frogspawn and it is very difficult to find now. When we were young, the teachers in Ballyegan school brought frogspawn into the classroom so the children could watch it develop into tadpoles. That is gone. The butterflies we used to chase as children have largely disappeared, the marsh fritillary, a very rare find these days. The gadfly, the bog insects, the whole living texture of that place has been thinning out across decades. This is not a vague feeling. It is something I have watched happen species by species, something that fills me with sadness. Placing eleven industrial turbines in the immediate proximity of what is left is not something the habitat can absorb.

The birds question is serious and I want the Inspector to know I have looked into this. There is a confirmed breeding merlin recorded around 3 kilometres from the site in 2025. The developer conducted no nocturnal survey work and used no acoustic equipment in the ornithological assessment. For a site of this ecological sensitivity, those are not minor gaps — they are reasons why the survey cannot be relied upon.

The flooding question is one I am genuinely frightened by. At Jim's house, the water already comes up nearly to the back of the building in flood times. The flooding on the nearby callows this year lasted for six months or more. That is not an exceptional year, that is the situation as it stands before any development on the bog. The bog acts as a sponge and a buffer. Disrupt it with construction and infrastructure and that function changes. When I hear talk of floating roads being constructed across Sharavogue Bog, my immediate question is where the displaced water goes. There is only one answer. The Little Brosna River, which is connected to the hydrology of this whole area, already has a WFD baseline status of Poor — the developer assessed it as Moderate, which is not accurate. Under the Weser judgment, a water body already failing to meet good status cannot lawfully be made worse. For those of us at the low end of this landscape, that is not a technicality. It is the difference between a dry floor and a ruined house. I have no mechanism to protect Jim's home from flooding.

Jim has kept bees since the mid-1970s — thirty hives now, built up over nearly fifty years from a swarm our father caught in a tree in 1977. The bees travel over three miles for forage, which takes them across and around Sharavogue Bog. He supplies local honey and the demand for it is real and consistent. What turbines of this scale will do to those colonies — to their navigation, to their foraging behaviour, to the substrate vibrations through which they communicate — has not been assessed in this application. The research on infrasound and its effects on pollinators exists and the Inspector should look at it carefully. I am not claiming I can prove the outcome. I am saying the question has not been answered, and for a development of this scale beside an SAC in a landscape that depends on pollination, it should have been.

I have suffered from migraines for most of my life. Photosensitive migraine is a condition I manage day to day, and the prospect of regular shadow flicker from turbines at this proximity concerns me in a direct and personal way. The shadow study submitted with this application was modelled without terrain screening in WindPRO, despite the EIAR claiming that screening was applied. At three degrees of sun elevation — a real and regularly occurring condition in these latitudes, in the morning and evening hours of winter months — shadows from 180-metre turbines reach out a lot longer than the assigned 1630m. The study cut off its analysis at 1,630 metres. This does not mean that Jim will have no shadow flicker, it means that his property was not assessed which is just not good enough. That property at 1,678 metres from T1 falls just 58m outside that boundary.

On noise, the methodology is flawed in ways the Inspector should know about. The JOULE valley correction required under the Institute of Acoustics Good Practice Guide at section 4.3.9 is mandatory for terrain of this kind and was never applied by AWN Consulting. Using AWN's own figures with that correction applied, there are ten confirmed exceedances across receptor locations in the study. The WHO 2018 environmental noise guidelines are required by the Offaly County Development Plan under DMS-109 and were never assessed. The noise environment at his property matters to him every single day, and the assessment that is supposed to protect him has not been carried out to the standard the County Development Plan requires.



The visual impact from Ballyegan will be severe. Both properties sit on elevated ground above the bogland where the turbines would stand. Above is the photo from the application montage and that house in the photo is Jims. (R 9). It is taken from an angle that reduces the impact as it is taken downhill. This is not a true picture of the scale of the intrusion for Jim's home. Jim already has a clear view of Knockshegowna Wind Farm. Carrig Wind Farm, once built, will be visible. What is being proposed here is not a single wind farm viewed in isolation — this community is being surrounded on multiple sides, and Ballincor, at 180 metres to blade tip and at the closest proximity, would be the dominant element. The cumulative visual effect has not been properly addressed in the EIAR. Eight or more of the eleven proposed turbines will be visible from both properties, on elevated ground, with no meaningful screening between Ballyegan and the bog.

The N62 is the road both households travel every day. Construction traffic for eleven turbines at 180 metres, on bogland, with all the associated infrastructure, will be substantial and prolonged. I have not found in what I have read a clear account of how that traffic will be managed, what road strengthening is proposed, or what the cumulative effect on this road will be over the construction period. That is not a peripheral concern for people who live and work along that route.

The Offaly County Development Plan designates this area as **Not Suitable** for wind energy development. It sits within what the CDP marks as a red area in the Wind Energy Strategy. Following the Coolglass decision in 2026, that designation must be given real and substantial weight, and the burden falls on the developer to justify departure from it. Nothing in this application meets that burden. Ballincor Area is in

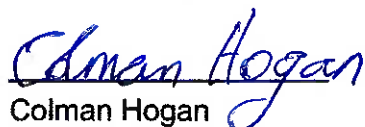
the red zone for the following reasons: the sensitivity of this landscape, its bogland ecology and its hydrological situation.

I want to return, in closing, to the fact that my property was missed entirely in the application. They set a 2km boundary and because I was outside that, my house deserved no assessment or consideration. Research says that noise, shadow flicker and certainly infrasound can all travel much longer lengths than 2km so I am not reassured that our house will be unaffected by these developments on that level.

There is a particular quality to the evenings along Sharavogue Bog that I would find it hard to describe to someone who has not lived beside it. The cool air off the bog, the quiet, the sense that something wild and old is still out there. The wildlife that remains — the cuckoo, whatever bees survive, whatever birds still nest on the margins — depends on that ground being left in some kind of peace. I have watched enough disappear already across my lifetime to know that these things do not come back once they are gone.

For all of these reasons, and most particularly in light of the CDP designation, the unresolved Habitats Directive and WFD legal tests, the inadequate ornithological survey, and the flooding risk to existing homes, I am asking An Coimisiún Pleanála to refuse this application.

Yours faithfully,


Colman Hogan