

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

AN COIMISIÚN PLEANÁLA
LDG- 288960-26
ACP- _____
02 JUL 2026
Fee: € 50 Type: new
Time: 14.5 By: LC

David Cleary & Megan Curran

Address Lucka
Shinnone
Birr, Co. Offaly
DATE R42 Dx70
28/6/26

25th June 2026

**Case Ref: Planning Application PAX 92.324279 — Proposed Ballincor Wind Farm, Co. Offaly
Receptor 5**

Dear Inspector,

We are David Cleary and Megan Curran. We have lived at our home — identified as Receptor 5 in the applicant's register — for four years, with our six children. Two of our children are older. Four are very young: a seven-year-old, a four-year-old, and three-year-old twins. There are eight of us living in this house. It is the home we chose for our family, and it is the home in which our small children are growing up.

We have read the applicant's shadow flicker chapter, the noise chapter, and the visual impact assessment. We have also read the receptor-specific analyses prepared by our community group. We are making this submission because, on the applicant's own figures, our home appears to be one of the most seriously affected homes in the area when noise, shadow flicker and visual impact are considered together.

We are not, in the language of the planning system, an unaffected neighbour. We are one of the closest non-landowner residences to the proposed turbine cluster. Our property is identified in the receptor-specific work for this submission as one of the small group of homes worst affected by noise, shadow flicker and visual impact at the same time.

The applicant's assessments treat noise, shadow flicker and visual impact as separate exercises, each with separate thresholds. A property may be borderline on one issue, comfortably distant on another, and well screened on a third. That is not our situation.

Of the seven receptors reviewed in depth in this submission, our home has more turbines inside the relevant study boundary than any other except one. Seven turbines are within two kilometres of our home. T03 is 737 metres away. T04, T05, T02 and T06 are all between approximately 1.1 and 1.5 kilometres away. The nearest turbine is closer to our front door than the village shop.

The combined effect of these turbines on noise, on shadow cast through our windows, and on the view from every side of our house has not been assessed anywhere in the application as a single lived experience. We live the combined experience. We are concerned that the Board is being asked to decide on the acceptability of the impact on our home without being shown what that combined experience will be.

Noise

The applicant's noise consultant, AWN, predicts a cumulative night-time noise level at our home of 41.8 dB LA90 at 8 and 9 m/s wind speeds, against an assigned night-time criterion of 43.2 dB. That is a margin of only 1.4 dB. At 7 m/s, the predicted level of 41.7 dB is 1.3 dB below the 43.0 dB criterion that applies at that speed. On those figures, the applicant claims compliance.

We appreciate that noise modelling is technical, but for our family the issue is straightforward: the applicant's own prediction leaves very little margin before the night-time limit is reached.

That very small margin depends on a series of modelling assumptions which, while individually permissible, have the collective effect of reducing the predicted level just below the compliance threshold. These include a ground-attenuation factor of $G=0.5$, a 4-metre receiver height, and a daytime threshold set at the upper end of the WEDG range despite the exceptionally low background noise baseline – An honest assessment would have considered the very low background noise environment and chosen the lower of the 35-40db range. Taken together, these assumptions leave very little headroom.

The Institute of Acoustics Good Practice Guide, section 4.3.9, provides for a +3 dB valley correction where the JOULE geometric condition is satisfied between a turbine and a receptor and where the ground attenuation chosen is $G=0.5$. Our home is governed by NML6, the monitoring location at the centre of a confirmed cluster of valley-correction exceedances at neighbouring receptors. The same valley landform that triggers the correction at those neighbouring receptors also runs across this property.

The correction does not appear to have been applied anywhere in the application. The submission contains no reference to concave ground, no reference to valley propagation, no reference to section 4.3.9, and no receptor elevation data by which an independent reader could test the geometry.

If the +3 dB valley correction is applied to a margin of only 1.4 dB, the position changes materially. On the applicant's own figures, if the valley correction required by the stated methodology is applied, our home appears likely to exceed the night-time criterion assigned to it. We do not believe the Board can safely conclude that our home is compliant on noise unless this correction is properly applied and properly tested.

We are also concerned that the worst-case at our home occurs at 8 m/s, the wind-speed band where AWN's own Table 11-10 records the governing NML6 background as **extrapolated** rather than measured. The survey was conducted in summer only. Therefore, the figure against which our home is judged at its worst-case wind speed is not a measured value. It is a projection from a summer-only dataset, taken at a single monitoring location, and used to set the limit applied to a home surrounded by multiple turbines. This again demonstrates an active and deliberate approach designed to at any cost meet a compliance threshold.

We do not consider this an adequate basis for permitting an 11-turbine development with an operational life of approximately 35 years.

Shadow flicker

The shadow flicker figures matter to us because this is not an occasional or distant effect. It is predicted to occur at our own home, through the rooms our children use every day.

The applicant's WindPRO output for the worst-case turbine scenario, the N163, records 40 hours and 4 minutes of shadow flicker per year at our home. This is above the 30-hour annual threshold applied in the planning system. The maximum daily exposure is 33 minutes, above the 30-minute daily threshold, on 13 days of the year. These are the figures produced by the applicant's own software, using the applicant's own coordinates.

Chapter 16 of the Environmental Impact Assessment Report reports those 13 days. However, the applicant's own Appendix 16-1, on the same model run, records 123 days of shadow flicker at our home per year. This means that 110 days of predicted shadow flicker do not appear in Chapter 16.

Those 110 days are days on which our home is predicted to experience shadow flicker lasting less than 30 minutes. Compliance with the 30-minute daily threshold does not mean shadow flicker does not occur on those days. It means only that the duration is below the threshold selected for reporting in the chapter.

For a family with very young children, that distinction matters. The chapter does not present the full number of days on which shadow flicker is predicted to occur at our home. As a result, we do not believe the Board is given a complete picture of the number of days on which our family may experience shadow flicker.

There is also a further issue that does not appear to be addressed in the chapter. Turbines T03 and T02 are separated by just 9.1 degrees of bearing as seen from our home. Two turbines that close in bearing can produce a daily compound shadow window, where the sun passes behind both turbines within the same period. The receptor-specific analysis estimates this compound window at approximately 36 minutes per day on suitable shadow days. T05 and T06, at 19.9 degrees of separation, produce a wider compound window of approximately 80 minutes per day.

The applicant's chapter does not appear to analyse multi-turbine simultaneous flicker at our property or elsewhere. This matters because the 30-minute threshold relied upon in the assessment appears to treat flicker as a single-turbine exposure. It does not separately address the irregular or compounded effect that can arise when more than one turbine contributes to flicker through the same windows.

The applicant relies on an Expected annual figure of 6 hours and 26 minutes to show compliance. We are concerned that this Expected figure is based on the wrong sunshine baseline. The WindPRO model was run on Birr 1981–2010 sunshine data, a dataset whose midpoint is now more than forty years in the past. The EIAR footnote also appears to misattribute this data to Mullingar.

The contemporary Met Éireann station at Gurteen, approximately 4.5 kilometres from the site and operational since 2008, records 27.5% more annual sunshine than the Birr data used. Applied to our home, the corrected Expected figure rises to approximately 8 hours and 12 minutes. That correction addresses only the sunshine baseline. It does not address the omitted shadow days, the compound flicker issue, the geometry, or the absence of a disclosed method explaining how the Expected value is derived from sunshine and wind-direction fractions.

We are being asked to accept the Expected figure without being shown the full method by which it was produced.

Our concern is that several assumptions in the applicant's assessment appear to reduce the predicted level of impact at our home. Even after those assumptions are applied, the results remain very close to, or above, relevant thresholds. If the valley correction is applied, the noise position appears materially worse. For a household with four very young children, where individual sensitivities and longer-term effects are unknown, we do not believe this provides a safe or complete basis for assessing the real impact on our family. It is impossible to have confidence in the methodology and we ask the Inspector to interrogate the approach taken.

Visual impact — surrounded, dominant and overbearing

The visual impact is not an abstract landscape issue for us. It is the outlook from our kitchen, our garden, our children's bedrooms, and the place where our children play.

Our home is classified in the applicant's own Landscape and Visual Impact Assessment dataset, Appendix 8-4, as Profound-Substantial for visual impact from the Ballincor turbines alone, and as Profound-Substantial on the cumulative assessment as well. These are the highest classifications in the methodology the applicant itself adopted. They are reserved for the small number of receptors where the visual change is judged to be of the greatest significance. Our home is one of them.

From our property, the applicant's data records five Ballincor turbines visible out of the 11 proposed, three Lacka turbines already visible on the hill to the south-west, and, if Carrig Wind Farm is built as recently permitted, seven Carrig turbines visible. That is fifteen turbines visible across the combined developments.

The proposed Ballincor turbines are up to approximately 185 metres in tip height. They are not minor structures on a distant horizon. They will sit on flat bogland, with the nearest turbine approximately 737 metres from our home, rising more than a hundred metres above the surrounding landscape.

The Knockshegowna (Lacka /Skehenagh) turbines already visible from this property are familiar turbines on a hill in the middle distance. The Ballincor cluster would be different in kind because of its height, proximity, and position in relation to our home.

The word our family uses for this is "surrounded". The view from one side of the house already includes Knockshegowna in the middle distance. The view from another side would include Ballincor in the immediate foreground. The view from a third side would, on the applicant's own visibility analysis, include the permitted Carrig turbines once they are built.

From the children's bedroom windows, from the kitchen, and from the back garden where our four young children play, there would be no direction we could look without seeing rotating industrial structures across the landscape.

The applicant's LVIA does not present a photomontage from our property showing the combined simultaneous visual experience of Knockshegowna, Ballincor and Carrig as they would appear to us. That cumulative visual experience is what will determine what daily life in this house feels like. It has not been visualised in the application.

The technical term the LVIA uses is "visual dominance". For our home, the concern is that the proposed turbines, combined with existing and permitted turbines, would create a near 360-degree industrial visual envelope around a home occupied by a family of eight. Our four youngest children will not remember the landscape as it is today. They will grow up with this as their normal.

Six children, eleven turbines, thirty-five years

The applicant's health chapter, Chapter 5, was supposed to assess the impact of this development on the people who will live near it. In our view, it does not properly assess the combined health and wellbeing implications for a household such as ours.

Instead, the health chapter appears to defer to the noise chapter and the shadow flicker chapter. Those chapters, in turn, assess compliance with technical thresholds, but do not assess the lived effect of noise, shadow flicker and visual dominance together. The result is that no part of the application appears to ask what 35 years of exposure to these combined effects may mean for a child who is three years old today.

We are not asking the Board to accept that our children will be harmed. We are asking the Board to acknowledge that the application does not appear to have asked the question in a complete or child-specific way and the Board upon interrogation cannot be satisfied that they have done so.

The literature referred to in the community submission is not advocacy material. The WITNES polysomnographic study by Persson Wayne et al. demonstrated, through physiological measurement, that wind turbine noise can produce EEG arousals during sleep, alter sleep stages, and reduce slow-wave sleep. The Morsing et al. study identified amplitude modulation strength as an important variable in adverse sleep effects. The applicant's own noise chapter acknowledges that amplitude modulation is an inherent characteristic of the proposed turbines, but it has not been specifically assessed.

The measured night-time background near this site is roughly 17 to 19 dB(A), which is effectively very quiet. That matters because sleep disturbance effects are most concerning in quiet baseline environments, where there is little existing acoustic masking.

Children are not small adults. The peer-reviewed sleep and noise literature consistently identifies young children, alongside older adults and those with sleep or cardiovascular conditions, as among the populations most vulnerable to chronic environmental noise exposure.

Of the eight people living in this house, six are children. Of those six, four are aged seven and under. They are precisely the population the precautionary principle exists to protect, and they are the population whose position has not been specifically assessed in the applicant's material.

Property value

We bought this home four years ago. It is our family home, and like the homes of most rural families, it is our principal financial asset.

The independent property impact report submitted with this objection sets out peer-reviewed evidence from several countries and methodologies, including the 2019 AECOM study commissioned by the Department of Housing. That evidence indicates that large wind turbines within two

kilometres of residential properties can produce measurable reductions in value, with the largest effects in rural high-amenity areas, for the tallest turbines, and in the closest distance bands.

We are inside the closest distance band. The proposed turbines are at the upper end of the tallest category. The rural amenity character of this area is precisely the character that the literature identifies as being most affected. Applied to our home, those findings point to a serious potential impact on the value and marketability of our property.

We did not invest four years of our family's life in this home in order to absorb that loss without objecting.

Local environment and community

This place matters to us not only as our home, but as part of a small rural community whose neighbours have shown a real and sustained commitment to the wildlife and landscape around them. We have watched neighbours plant hedgerows, maintain field margins, and protect the habitats around the bog. The biodiversity value of this area is not hypothetical. It is the work of identifiable people, sustained over years, in a landscape that the planning policy maps already designate as unsuitable for industrial wind development.

We will not repeat in full the case made elsewhere in the larger community submission on ornithology, bats, hen harrier, kingfisher, otter, the SAC and the protected bog. We simply say this: the applicant's case that renewable energy benefits outweigh local environmental costs can only be sustained if those local environmental costs have been accurately measured. In our view, they have not.

Request to refuse permission

We are asking the Board to refuse permission for this application as submitted, and we are doing so on the basis of the applicant's own figures, applied to our home.

On noise, the applicant's own predicted level at our property — 41.8 dB LA90 at 8 to 9 m/s — sits only 1.4 dB below an assigned criterion of 43.2 dB. There is very little headroom, and the section 4.3.9 valley correction in the Institute of Acoustics Good Practice Guide does not appear to have been applied at NML6-governed receptors, including ours. We do not believe the Board can safely satisfy itself that this home is compliant on noise unless that correction is properly assessed.

On shadow flicker, the applicant's own WindPRO output records 40 hours and 4 minutes of annual exposure at our home, above the 30-hour threshold, and 123 days of annual shadow flicker, of which Chapter 16 reports only 13. The Expected figure relied on by the applicant is based on Birr 1981–2010 sunshine data, which is materially lower than the contemporary Gurteen record. The

method by which the Expected value is derived has not been disclosed, and the application contains no clear analysis of compound multi-turbine flicker at our home.

On visual impact, our home is classified as Profound-Substantial both for Ballincor alone and cumulatively. Fifteen turbines would be visible across the combined developments, yet no photomontage from our property shows the cumulative visual experience our family would live with.

Taken together, these findings raise serious doubt as to whether the application has properly described and assessed the likely significant effects on our home, as required under the EIA process. In our view, the shortcomings in the assessment all run in the same direction: they understate the impact this development would have on our family and on neighbouring homes around the perimeter of the development.

We respectfully ask the Board to refuse permission.

If, contrary to that request, the Board is minded to grant permission, we ask that it does not do so without first requiring:

1. A corrected noise assessment that applies the section 4.3.9 valley correction at all NML6-governed receptors, including our home, that recognises the low background noise levels and adopts the lower range thresholds, that captures the noise impact beyond 7/8m/s in real world data not extrapolation.
2. A corrected shadow flicker assessment using contemporary Gurteen sunshine data, with a disclosed derivation method for the Expected value, an analysis of compound multi-turbine exposure, and a reporting approach that shows all predicted shadow flicker days, including those below 30 minutes.
3. A cumulative photomontage from our property showing the simultaneous visual experience of Knockshegowna, Ballincor and Carrig as it would be experienced from our home.
4. A specific health and wellbeing assessment, by a qualified independent assessor, of the combined effect of noise, shadow flicker and visual dominance on a household with four children aged seven and under, conducted before any decision is made rather than left to post-permission monitoring or a developer-operated complaints system.

We do not believe that the lived experience of the people in this home has been adequately or accurately assessed. We respectfully ask the Board to consider the real combined effect of this development on our family, and to refuse permission.

Yours faithfully,

David Cleary and Megan Curran

Megan
Curran.

David Cleary