

David and Ann Calvert

Brosna
South-East Area
Co. Offaly
R42 E181

An Coimisiún Pleanála
32 Marlborough Street
Dublin 1
D01 V902

AN COIMISIÚN PLEANÁLA	
LDG-	088742-26
ACP-	
30 JUN 2026	
Fee: €	50 Type: <i>Chg</i>
Time: 9:15	By: <i>Resk</i>

5 June 2026

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

Dear Inspector,

My name is Ann Calvert and I am writing jointly with my Husband David. We live in the Brosna area on the south-east of County Offaly and we have lived here all our lives. Our home sits on elevated site above the bog land, looking out over a landscape that has shaped everything about the way we have lived and the family we have raised.

I grew up as one of six children and we cut turf in this bog every summer. It was a family event — the turf was hand cut and footed and eventually brought home, and in between there were picnics, sandwiches, tea made from bog-hole water, and long afternoons swimming in the River Brosna. My father and brothers fished there for rainbow trout and cooked it at the riverside with wild onion and butter, and it tasted wonderful. My own children grew up doing the same things — playing in the bog, swimming in the river, walking there on spring, summer and autumn evenings with field guides to leaves and flowers and animals, watching the badgers and the otters and the grey swans. When our sons were in the Boy Scouts, groups of them canoed the length of the Brosna and ate by the bank. We are not occasional visitors to this landscape. It is the ground we have stood on every day of our lives, and the thought of what this development would do to it is something we feel very sad about. We respectfully ask An Coimisiún Pleanála to refuse this application for the reasons set out below.

The biodiversity of the bog and river corridor here is something the developer's assessment has not dealt with honestly. The Sharavogue Bog SAC lies within ten metres of the proposed site boundary. This is a Priority Habitat under European law — active raised bog subject to ongoing State restoration — and the legal test that applies is a binary one. The developer has waived both the Article 6(4) IROPI

derogation route and the Article 4.7 WFD derogation route, which means there is no fallback position. Either the project causes no adverse effect on the integrity of the SAC, or it cannot proceed. We do not believe that test is met. The Little Brosna River, which our children swam in and which remains one of the living threads of this landscape, currently has a WFD baseline status of Poor. The developer assessed it as Moderate. That discrepancy is not a minor administrative difference — it goes directly to whether the Weser judgment obligations are being applied correctly, and we believe they are not. Any further deterioration of a waterbody already classified as Poor is prohibited, and a development of this scale, with all the groundwater and peat disturbance that entails, cannot credibly claim a neutral effect.

There is a barn owl roosting in our neighbour's shed across the field from our home. We hear and see it regularly. That sound is one of the things we listen for on quiet evenings, and it matters to us in a way that is hard to put into planning language but that we believe An Coimisiún Pleanála is entitled to hear. Barn owls are a priority species under the Wildlife Acts and their presence within the immediate vicinity of a wind energy development of this scale is a material consideration in its own right. Beyond the barn owl, we have regularly seen buzzards, kestrels, hawks and other owls throughout this area for as long as we can remember. These birds are here because there is food here for them and their young, rabbits, hares, rats, moles and because the habitat supports them. Construction activity of the kind proposed will drive that prey population away, and once the prey goes the birds of prey follow. Research in this area is consistent: once displaced from a territory, these species do not return. We are also deeply concerned about the golden plover. The cumulative kill modelling for Ballincor combined with Carrig and Derrinlough reaches between 47 and 118 birds per year from a population already running at fifty per cent below its conservation target. That is not a marginal or speculative concern. It is an arithmetic consequence of approving this project alongside those that surround it, and it deserves direct engagement in the Inspector's report. We are equally concerned about the merlin. A confirmed breeding pair was recorded 2.8 kilometres from the site in 2025. The developer conducted no nocturnal survey work and used no acoustic equipment. That is not an adequate survey methodology for a species in this situation, and we do not believe the merlin impact has been properly assessed.

I am an Assistant Director of Nursing at the Midland Regional Hospital in Tullamore and David is a radiographer. We both work night shifts and we both sleep during the day. That is the practical reality of our working lives, and it is the context in which we have to understand the noise assessment for this development. The nearest turbine, T11, sits 1,916 metres from our home. We are aware that at that distance the predicted noise levels may fall within the limits set by the developer's assessment. What we cannot accept is that those limits are themselves appropriate. The WHO 2018 Environmental Noise Guidelines recommend a night-time limit of 45 dB for night wind turbine noise, with a strong recommendation to aim lower where feasible. The Offaly

County Development Plan, at DMS-109, requires the WHO 2018 guidelines to be applied. They were not assessed by the developer. The daytime limits applied are higher than night-time limits, on the assumption that people are awake and active during the day. In our household, that assumption is wrong on the days that matter most. When we come home from a night shift, the quality of the sleep we get in the hours that follow directly affects the clinical judgments we make for patients. I sleep lightly. David has intermittent sleep apnoea. Neither of us can afford the kind of broken sleep/rest that turbine noise, particularly amplitude-modulated noise in otherwise quiet rural conditions is known to produce. We also sleep with bedroom windows open in summer, and our bedroom faces toward the proposed site. The noise limits that the developer says will protect us were not calculated using the methodology that the applicable planning policy requires, and that is a failure that cannot be remedied by assurance alone.

The shadow flicker picture is, if anything, more troubling because of the specific way our property sits in the landscape. Our home is on noticeably elevated ground above the bog land. The turbine bases will be at between 42 and 62 metres Ordnance Datum. Our receptor elevation is recorded at 76.2 metres OD — 31.2 metres above the turbine base — which means our kitchen and bedroom windows sit above the bottom of the blade sweep. The shadow flicker study was conducted in WindPRO with terrain screening deactivated, despite the EIAR at Section 16.2.4 claiming that it had been applied. That is a material inconsistency between what the model actually did and what the assessment document says it did. The study boundary was set at 1,630 metres. At a sun elevation angle of three degrees — a standard consideration for morning and evening shadow at these latitudes — shadows from turbines of this tip height travel to 3,435 metres. Our home at 1,916 metres from T11 falls well within the shadow reach that was never modelled. Because we were outside the 1,630 metre study boundary, we were not included in the shadow study at all, even though the geometry of the terrain and the sun path means we are exposed. The bedroom and kitchen windows that face toward the site are the same windows through which rotating shadow would enter. The Commission should not accept the developer's shadow assessment as adequate for our property.

The roads in question touches both our daily lives and, given our professional backgrounds, something larger. We use the R492 every day. It is the only viable direct access route to our village during construction. We also travel the R439 between Birr and Banagher and the N62 regularly, and we use the Sharavogue crossroads daily. We have no objection to roads being used — they exist to be used — but a construction programme of this scale, with the abnormal loads and the extended heavy vehicle movements that are standard on a development of eleven turbines at 180 metres tip height, will cause damage and disruption that is not trivial. These roads were not built to take this volume, this weight of traffic. The more serious concern, and the one that deserves specific attention given what I do for a living, is the emergency access situation. If there is a major incident at the construction site, the nearest trauma centre is in Tullamore, forty-five minutes away under normal conditions. Ambulance response

to a site in this location will take up to an hour. Stabilising patients and transferring them on roads already compromised by construction traffic presents particular risks, and helicopter rescue will not be possible at the turbine construction site itself. These are not hypothetical concerns. They are the practical consequences of approving construction activity at this scale and distance from emergency services, on the only road that serves the surrounding community.

I would also like to point out at this juncture the difficulties that will be met by emergency vehicles trying to access the village of Shinrone and immediate surrounding areas. Once again there will be most likely delays to this population, when they need emergency help/care.

We are also concerned about infrasound. The science in this area is still developing, and we do not claim certainty about the effects on health at our distance. What we do know is that the precautionary principle exists precisely for situations where the evidence base is incomplete and where the potential harm is serious. At 1,916 metres, with a household that includes a person with sleep apnoea and two healthcare workers whose performance depends on adequate rest, dismissing infrasound concern as unquantified is not a sufficient answer.

A matter of particular concern to me is the effect on pollinators. When our son was younger, it was local honey from bees working this very landscape that helped clear his hay fever. That is not folklore, it is something we witnessed. The bog and river margins here support the plant communities that pollinators depend on. Peat disturbance, habitat fragmentation, and the disruption of drainage patterns that come with a development of this footprint will affect those communities, and the effect on bee populations in this area is something the developer has not adequately addressed.

The Offaly County Development Plan designates this area as Not Suitable for wind energy development. It sits within the red zone of the Wind Energy Strategy. That designation is not a technicality. It reflects a deliberate policy decision about where this kind of development is and is not appropriate, made by the elected members of Offaly County Council on the basis of landscape, habitat, and community impact considerations. Following the Court of Appeal judgment in Coolglass, that designation carries real and significant weight. The burden falls on the developer to demonstrate why departure from it is justified. We do not believe that burden has been discharged. The biodiversity failures alone — the SAC proximity, the WFD baseline error, the inadequate bird survey methodology, the cumulative golden plover impact — are each independently capable of justifying refusal. Taken together, and set against a CDP designation that says this is not a suitable location, the case for refusal is, in our view, clear.

We are not people who object to things easily or often. We are both healthcare professionals. We understand the importance of evidence. We have read the documents we were able to access and we have tried to be as accurate and specific

as we can in raising the concerns that affect us. This landscape is not abstract to us. The river the developer's assessment speaks of in measured technical language is the river where I learned to swim. The bog where the shadow study boundary was drawn is the bog where our family cut turf and our son's paddled canoes. The shed across the field is where the barn owl roosts tonight. We ask the Inspector to give these concerns the weight they deserve, and we respectfully request that permission be refused.

Yours faithfully,

David Calvert



Ann Calvert



Niall Calvert



James Calvert



Margaret Calvert

