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R42 PE09
28 June 2026

**Case Reference PAX92.324279 : Proposed Ballincor Wind Farm Development and
Associated Road and Infrastructure Works**

Grounds for our Objection to this proposed Development.

Dear Sir/Madam:

I am presenting this submission to object in the strongest terms to the proposed development at Ballincor — ref above. My principal reasons centre on my deep commitment to environmental preservation, in particular the protection of Sharavogue Bog SAC, the preservation of the River Brosna and in support of all of the species who enjoy this very special place.

Sharavogue Bog (SAC).

I am passionate about our native wildlife, in particular wetland bird species and our ever-diminishing wild areas. Sharavogue Bog is an extraordinarily unique area of raised bog that in the last 40 years has been saved from draining and cutting. In fact the bog is one of the first examples of rewetting in Ireland, with over 400 rewetting dams installed by the State in 2021 and 90% of the requisite drains now blocked.. The bog is a Priority Habitat under EU law and is at the most sensitive moment in a decades-long, State-funded restoration programme — with water tables higher now than at any previous point in that programme. Now under the protection of local people in the community this area of peatland must remain protected for future generations.

With several of the proposed turbines just metres from the edge of the bog — the developer's own documents put the SAC boundary at less than 10 metres from the wind farm perimeter at its closest and both T8 and T9 will be particularly problematic for the river and the Raised bog adjacent. This development is highly likely to have a negative impact on the bog for a number of reasons.

- The developer's own reports acknowledge groundwater connectivity between the site and the bog. NIS Table 6-1 confirms a groundwater pathway through the Shinrone groundwater body to a SAC designated for groundwater-dependent habitats and states that "a potential for adverse effect was therefore identified." And then, just two pages later in Table 6-2, that

pathway simply vanishes — no engineering measure, no mitigation, nothing to explain the change of mind. How is that supposed to give anyone confidence? How is this going to impact the hydrology of the bog? Is it likely to dry out areas of the bog? Will water tables drop because of haul road construction and the dewatering of eleven turbine foundations and three borrow pits dug between 4 and 5 metres below ground level — several metres below the existing peat water table?

- It is widely recognised that peatlands are formed over thousands of years and the species that call these areas home have evolved alongside this unique ecosystem. Sharavogue's position alongside the Little Brosna River makes it all the more unique. The developer's own EIAR records calcareous fen and upwelling base-rich water on the eastern margin of the wind farm site — the exact interface with the bog. The NPWS describes the lagg zone at Sharavogue as one of the best developed in Ireland and "very rare in Western Europe." That feature is entirely dependent on shallow groundwater. Slender Cottongrass, a plant protected under the Flora Protection Order, has been recorded in that same lagg zone. The proposed development is highly likely to impact wildlife access to this SAC from the surrounding landscape, and to disturb the very water regime the State has spent the last four years trying to restore.

The Little Brosna River

The Little Brosna River, a tributary of the Shannon, forms the main boundary line between the proposed development and Sharavogue Bog. That the developers would choose the river to act as the boundary line, to claim it as their own, is especially concerning. It is well known that migrating wetland bird species use our rivers as navigational routes to aid with moving from roosting sites to feeding grounds. The Little Brosna is connected to Ashtons Callow, an area that every winter attracts numerous species of wildfowl, particularly Greenland White Fronted Geese as well as Whooper Swans. The birds can be seen throughout the winter months flying along the route of the river. The River Little Brosna Callows SPA, just 7–8km north of the site, is of international importance for golden plover, black-tailed godwit and Greenland white-fronted goose and is home to over 20,000 wintering waterbirds. The entire world population of Greenland white-fronted goose winters in Ireland and Scotland — our responsibility for that bird is absolute. Its conservation objective is to restore, not maintain, favourable condition, because the population is already in trouble.

The size, scale and location of the proposed development will without doubt directly impact these birds and their movements along the river. To make matters worse, the developer carried out almost all of their bird surveys in the middle of the day — acknowledged in their own report — even though these are the very species that fly most at dawn and dusk and after dark. How can a planning authority be asked to make a decision about geese and swans on the basis of survey data that systematically missed the times of day when those birds actually use the airspace?

It is also worth noting at this point that there is an enormous cumulative effect that has not been fully considered by the developers. Within just a few square kilometres of the site there are now several wind developments that are either built or proposed — Knockshegowna, Lacka and Cloghan already built, Derrinlough with 21 turbines to the north, and Cush (8 turbines) and Carrig (7 turbines) recently granted. With Ballincor's 11 turbines added, the Brosna corridor that whooper swans use to commute between the Sharragh roost and the Callows SPA will be flanked by turbine infrastructure at both ends. No developer has assessed the combined collision risk or barrier effect on the birds that use that corridor. Each application has simply assumed the next one will not cause harm. This will directly impact the movements of wildfowl that overwinter in this area of the Shannon and Little Brosna callows every winter. Their approach to cumulative assessment is reductive, dismissive, disingenuous and unacceptable.

Direct impact on fish and the health of the Little Brosna

I have serious concerns that any development will not be properly policed during the construction phase. When a developer shows such degrees of complacency to the Planning application process, a process interrogated and adjudicated how can we trust that any mitigation proposals will be honoured to the letter. The mitigation proposed in this submission is woefully incomplete and inadequate. What measures will be put in place to control chemical spillages, contamination from concrete, silt entering the river either directly or indirectly through drainage channels? Who will monitor this? Will ACP be responsible for this, or will this fall to the local authority or IFI? We all know how short staffed these organisations are, so will this mean that the developers will be permitted to do as they please with no checks in place?

These concerns are not hypothetical. The Little Brosna is already classified as “Poor” under the Water Framework Directive and is deteriorating — yet the developer's own impact assessment was carried out using a “Moderate” baseline, one full status class better than the truth. Under EU law, any further deterioration of a Poor waterbody is prohibited. The developer's pre-construction water sampling did not even measure phosphorus — the very pollutant most likely to enter the river from disturbed peat — yet the construction-phase monitoring plan claims to set triggers “against pre-construction values” that were never recorded. The whole monitoring framework is circular. Iron, which is plainly visible as ochre in the on-site trial pits, was not measured either.

The river supports Atlantic salmon, three species of lamprey, European eel (Critically Endangered globally), and a genetically distinct sub-population of brown trout in the Croneen tributary that Inland Fisheries Ireland has identified as a national priority. The word “Croneen” does not appear anywhere in the developer's biodiversity chapter. Fourteen drainage crossings are proposed through the site with no fish passage assessment. All of these are exactly the points IFI raised at scoping — and were not implemented. If our State agencies are not even being listened to at the application stage, what hope is there that they will be listened to once the diggers are on the ground?

Flooding and its impact further down stream

This river floods every winter, covering a large portion of the proposed development site to depths of several metres in times of high flood. These floods can remain in place for months at a time. The developer's own flood risk assessment confirms that four of the eleven turbines — T1, T2, T8 and T9 — sit in Flood Zone A or B. Under a 1-in-100-year event, T9 is 50% inundated. Under their own climate-uplift scenario, that rises to 75%, and the access tracks along the river are completely under water. Anyone who has stood on that land in February already knows this. How is construction going to work around this? Will the river's natural floodplain be interrupted? How will this impact the village of Riverstown and the town of Birr both further downstream? Will larger volumes of water now be allowed to rush downstream instead of being able to attenuate out into the river's natural flood plain?

The silt traps and settlement ponds the developer is relying on to keep construction sediment out of the river are designed for normal conditions. When the floodplain is under water — which it is every winter, not once in a hundred years — those controls are simply submerged. Construction material flows directly into the Little Brosna. And the flood season overlaps exactly with the season when salmon are migrating and spawning. The developer applied only a +20% climate uplift to their figures and never engaged the +30% "High End" scenario, even though these parts of the site are sitting in Flood Zone A.

It strikes me that of all the places to position a wind farm, a natural high risk floodplain that drains into a Poor-status river beside an actively restored Priority Habitat raised bog is certainly not the most sensible one.

Construction Traffic.

The scale of this project is simply enormous. Having witnessed first hand the massive volumes of stone and concrete required to construct the wind farm at Derrinlough in the last number of years, as local residents we are fully aware of the enormous quantity of raw materials needed to construct such a project, not to mention the abnormal loads of the turbines themselves.

The likelihood is that stone, concrete etc. will likely have to come from a quarry north of Birr, which will mean that every tonne of material will need to be transported through the town of Birr. Even the developer's own "southern" quarry route from Dowlings funnels back onto the N62 and R492 — the same narrow road that bottlenecks at the Blackbull crossroads. Whichever direction the lorries come from, they end up on the same stretch of road we use every day.

More than 8,000 vehicles pass through Birr on a daily basis and indeed the town has become quite congested in recent years. This development would require numerous daily truck movements to supply the raw materials, increasing the burden of traffic on the roads. Each of the eleven turbine foundations has to be poured in a single continuous operation — meaning, on those eleven days, 93 heavy vehicles must arrive on site, with 186 movements in and out, working out at one concrete truck on the road roughly every 6.6 minutes throughout the working day. The developer describes

this impact as “imperceptible.” It will not feel imperceptible to anyone driving the R492 on a pour day.

Our children travel the main Birr–Roscrea Rd (N62) as well as the R492 on the bus to school every day. This level of increased traffic will directly impact them and other road users in the area. The Blackbull junction is where heavy construction vehicles will turn off a 100 km/h national route onto a narrow regional road — a junction where, on the developer’s own admission, the turbine blade trailers cannot navigate without going off the road at Sharavogue crossroads. There will be tailbacks on the N62 every time a turbine delivery rolls through. What mitigation will be put in place to relieve congestion and the negative impact that this will have on local people travelling in the area? At a minimum, delivery restrictions during school run hours and independent before-and-after structural surveys of every bridge on the haul route should be required as conditions before any work begins.

Planning Burden

I have witnessed first-hand the enormous effort that has been made by our local community in contesting this development and scrutinising every element of the EIAR that has been submitted by the developer.

I feel it’s important to note that my observations are not simply NIMBYism but they are real and genuine concerns. No one is denying that we need clean sources of energy, however this need should not be allowed to come before the needs of the local environment and landscape — especially when the location chosen sits on a floodplain, beside a Priority Habitat SAC in active State-funded restoration, on a river already classified as Poor, in a corridor used by internationally protected migrating birds, and served by roads our children travel on every morning.

I sincerely hope that ACP will examine in detail every element of the EIAR and come to the same conclusions that our community has — that this proposed development is poorly considered, poorly prepared, poorly presented and will surely be poorly executed. It threatens to negatively impact the lives of numerous local households as well as the precious SACs of the Little Brosna River and Sharavogue Bog SAC.

I respectfully ask An Coimisiún Pleanála to refuse this application.

Dermot Ward.