

Dominic Slevin

Ardavagga

Shinrone

Birr

Co. Offaly

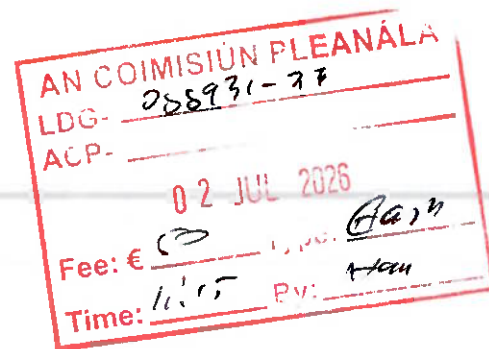
R42 TX65

An Coimisiún Pleanála

32 Marlborough Street

Dublin 1

D01 V902



5 June 2026

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

Dear Sir/Madam,

I am writing to object to the above planning application. I live with my family in the south-east of County Offaly, where four adults share the house, including my daughter who commutes to Athlone every day and my son who has dyslexia and dyspraxia. We sit on elevated ground — 72 metres OD — which means we already look out across open bogland with nothing between us and the landscape to the south and west. There is no tree cover, no hill, no screening of any kind on the front of the house. We already see the Derrinlough turbines, the Borris-in-Ossory machines and Knockshegowna clearly from our windows, and we have lived with that view long enough to understand what it means to have a turbine horizon become your normal. What is being proposed here would be something different in scale and proximity, and I want the Inspector to understand that this is not a generalised concern — it is the specific anxiety of people who know exactly what they are looking at.

My receptor reference is H104. The nearest turbine in this application, T11, is 1.41 kilometres from my home. I want to be clear about what that figure means in practice for a household on elevated ground. The turbine bases across the bog sit at between 42 and 62 metres OD. My home sits at 72 metres OD, some 27 metres above many of those bases. Because of that elevation, my property does not look up at these turbines from below — for several of the proposed machines, my eye level sits above the bottom of the blade sweep. That is not a marginal difference. It transforms the visual and acoustic relationship between this house and the site in ways that the developer's assessments have not properly grappled with.

The section of the EIAR I am most concerned about from a technical standpoint is the noise assessment. The noise modelling for my property is referenced under

NML4. The developer's own figures, before any correction, sit close to the relevant limits. What was never applied is the JOULE valley correction required under section 4.3.9 of the Institute of Acoustics Good Practice Guide — a mandatory correction for sites where turbines sit in low-lying terrain relative to nearby receptors. That correction was triggered at this property. The developer left the exceedance unquantified rather than address it. An assessment that identifies a mandatory correction, applies it nowhere, and then presents results as compliant is not a valid noise assessment. Ten exceedances have been identified across the development using AWN's own figures once that correction is properly applied. I am an electrical engineer and I work from home full time. I am in this house through the working day as well as at night, and the noise question is not academic for me — it is a matter of whether I can do my job and whether my family can sleep.

On sleep specifically: my son's dyslexia and dyspraxia are documented, and one of the things we have learned about him over the years is that high-frequency noise causes him real, physical distress. We found this out when we bought ultrasonic vermin repellents for the house — devices that worked well and that we were pleased with. Within a very short time he was crying with pressure and pain in his head. We removed them and the problem stopped. Every bedroom in this house faces the front — toward the turbine site — and that experience with the repellents has stayed with me when I read about the low-frequency and high-frequency components of wind turbine noise and what they can do to sleep and concentration. My daughter also suffers from chronic headaches, and she is worried about what sustained turbine noise will mean for those. I am not presenting these concerns as clinical evidence. I am telling the Inspector what this family's actual experience has been and what our actual fears are, and I think those fears are grounded in something real.

The WHO 2018 guidelines on environmental noise, which the Offaly County Development Plan requires to be assessed under objective DMS-109, were never applied by the developer. That is not a minor omission. Those guidelines exist precisely to protect residents at distances like ours from developments like this one, and the developer's decision not to engage with them leaves a material gap in the EIAR that cannot be closed by the Inspector inferring compliance from figures that were never tested against that standard.

I walk the bog below this house every single day. It is not a generalised amenity to me — it is the ground I know. The cuckoo comes back every spring and I listen for it. There are pheasants and pine martens. My daughter walks the dog down there too. The thing that has stopped both of us in our tracks, more than once, is the white-tailed eagle. We saw one again just last week. A bird that size, moving the way it moves, is not something you forget. I raise this because the cumulative threat to raptors from this development alongside Carrig and Derrinlough is something the EIAR handles inadequately. The modelled cumulative kill of golden plover across those three developments is estimated at between 47 and 118 birds per year from a population already running at roughly 50 per cent below its conservation target. That

is not a sustainable loss from a population already in difficulty, and the assessment does not show that it is.

The merlin breeding record 2.8 kilometres from the site, confirmed in 2025, was not in the developer's survey data because the developer carried out no nocturnal survey work and used no acoustic monitoring equipment. A species confirmation that post-dates the EIAR but was discoverable with appropriate methodology is not something that can be waved away. The white-tailed eagle we see regularly on the bog is a bird operating in exactly the territory that this development would industrialise, and I do not accept that the raptor assessment is adequate given the survey limitations that are now on record.

Sharavogue Bog SAC lies ten metres from the development boundary. It is a Priority Habitat under the Habitats Directive and it is under active State restoration. The hydrological connections between the site and the bog are not severed by a planning boundary, and any drainage disruption or peat instability during construction has the potential to affect the integrity of a site with the highest possible level of EU environmental protection. The developer has not pursued either the Article 6(4) IROPI derogation or the Article 4.7 WFD derogation. That means the binary legal test applies: if there is any reasonable scientific doubt that the development will not adversely affect the integrity of the SAC, permission must be refused. The Little Brosna River, which drains this catchment, has a WFD status of Poor. The developer assessed it as Moderate. That error in baseline matters because the Weser judgment requires that no development be permitted which risks preventing a water body from achieving its target status — and you cannot make that assessment accurately from a baseline that is wrong.

The visual impact on our house is something I have tried to describe in terms of what it actually means to look out of your kitchen, your living room, or your bedroom and have that be your view. We already see three wind energy developments from those windows. The Ballincor turbines, at 180 metres to tip, would be the closest by a significant margin — T11 at 1.41 kilometres — and because we are elevated above much of the site, we would see these machines not as distant structures on a flat horizon but as a presence that fills a 23.6-degree arc of the landscape directly in front of the house. The cumulative visual effect of Ballincor added to what we already see from Derrinlough, Knockshegowna, and what may follow from Carrig has not been honestly assessed. Each application treats the visual baseline as if the previous development is the normal against which the new harm is measured, but that logic produces a ratchet that never closes. At some point an Inspector has to say that a household has absorbed enough of this landscape change, and I would ask that this Inspector make that finding here.

The shadow flicker assessment placed my property within the study area and predicted zero hours. I would ask the Inspector to note that the WindPRO model used for this assessment had terrain screening deactivated — this is documented in Appendix 16-1, and it contradicts the claim in EIAR section 16.2.4 that terrain

screening was applied. For most properties that gap may be academic, but for a household that sits above the turbine blade bases, the failure to model terrain accurately is a material error. The shadow geometry for a property at 72 metres OD looking at turbines based at 42 to 62 metres OD is not the same as it would be for a ground-level receptor, and the zero-hours prediction should not be accepted without a corrected assessment.

My daughter uses the R492 and the N62 every day to get to work in Athlone. That journey already takes an hour in normal traffic conditions. Both roads carry heavy traffic and the junction at Sharavogue is one we all use daily. The R492 also passes close to our home. Construction traffic for a development of this scale — eleven turbines at 180 metres tip height, with blades and nacelles that require abnormal loads — will use these roads for an extended period, and the transport assessment has not persuaded me that the disruption to daily commute traffic will be manageable or that the roads themselves are designed to take what is being proposed. The question of emergency access is also one I want to put on record. Tullamore is our nearest hospital and Birr is our nearest fire brigade. If construction traffic or an incident on the site were to block or significantly delay movement on the R492 or N62, emergency access to and from this area would be compromised in a way that cannot be undone after the fact.

The Offaly County Development Plan designates this area as not suitable for wind energy development under its Wind Energy Strategy. That is a red-area designation, and it exists for reasons that are directly relevant to what is being described in this letter — the cumulative landscape impact, the proximity to sensitive ecological designations, and the effect on communities who are already living with wind energy development on their horizon. Following the decision in Coolglass, An Coimisiún Pleanála is required to give that CDP designation real and meaningful weight. The burden is on the developer to justify departure from it, and I do not consider that burden to have been discharged in this application. The noise assessment is incomplete. The shadow model contains a documented error. The ecological assessment rests on survey work that missed a confirmed breeding merlin. The hydrological baseline for the Little Brosna is wrong. Any one of those failures would give grounds for refusal. Together they represent an application that is not ready to be decided on its merits.

I am asking the Inspector to refuse permission for this development. My family has lived with wind turbines on our horizon for years. We know what they look and sound like. What is being proposed here is closer, larger, and more numerous than anything we currently see, and it is being proposed on the basis of assessments that contain material errors and omissions that the developer has not corrected. The bog below this house is where I walk every morning, where my daughter walks the dog, where we have both stood still watching a white-tailed eagle crossing the sky. I would like that to remain the kind of place it is. I ask the Inspector to refuse this application in full.

Dominic Slevin

A stylized, cursive handwritten signature in blue ink, appearing to read 'Dom Slevin'.

Mairead Slevin

A cursive handwritten signature in blue ink, appearing to read 'Mairead Slevin'.

Jacklyn Slevin

A cursive handwritten signature in blue ink, appearing to read 'Jacklyn Slevin'.

Daniel Slevin

A cursive handwritten signature in blue ink, appearing to read 'Daniel Slevin'.