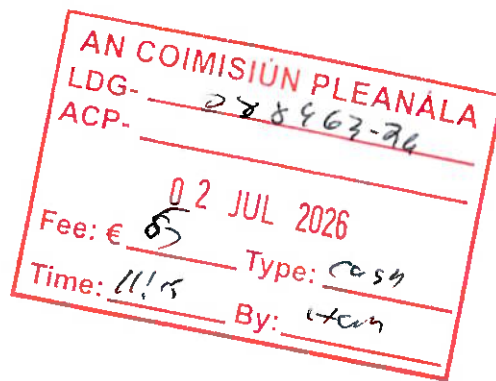




Elizabeth Burke
SHARAVOGUE
BIRR
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R42 X302

An Coimisiún Pleanála

64 Marlborough Street
Dublin 1, D01 V902

Re: Objection to the proposed Ballincor Wind Farm — Case Reference PAX92.324279

Dear Sir/Madam,

My name is Elizabeth Burke and I wish to formally object to the proposed Ballincor Wind Farm and all associated infrastructure.

I am resident in Receptor 254. I have lived in the parish of Kilcolman all my life. I work as a mental health nurse in the community, caring for clients across the Offaly area. In 2021 I was lucky enough to purchase my own home at Sharavogue. The main reasons I bought here, apart from being close to my home place, were the quiet location, the scenic landscape, the local amenities, and the good neighbours. Everything I love about where I live, and a number of the things I rely on to do my job, would be directly affected by this development.

I am setting out my objection under three headings: the local road, the wildlife I have personally seen on the land around me, and the noise and light from the turbines.

1. The local road between Blackbull and Shinrone (R492)

My home sits on the road that runs between Blackbull and Shinrone. This is the R492, and it is the road the developer has chosen as the main haul route for the entire construction of the wind farm. I use this road numerous times every day. I use it to go to work and to visit clients across Offaly. My pets walk on this road. My neighbours and their children use it. It is the road my daily life is built around.

The developer's own transport assessment describes the R492 as "relatively narrow, with limited hard shoulders and several bends." That is an accurate description. Yet the same assessment elsewhere describes the same road as "generally in good condition" and "suitable for heavy goods vehicles," and concludes that the impact of construction traffic on local roads will be "imperceptible" and "not

significant." Both descriptions of the road cannot be true at the same time, and the conclusion of "imperceptible" is not credible to anyone who actually lives on this road.

The scale of what is planned is not minor disruption. For each of the eleven turbine foundations, the concrete must be poured in a single continuous operation that cannot be stopped halfway. Each pour requires 93 heavy vehicle deliveries in one day — that is 186 heavy vehicle movements, or roughly one concrete truck passing my home every 6-7 minutes for the entire day. This will happen eleven separate times during construction. We can expect most two full years of road disruption, closures and diversions. Turbine blade deliveries are confirmed to take place outside normal hours, including at night, under Garda escort.

I want to raise specific concerns:

Will I be delayed getting to clients? I provide community-based mental health care. My visits are time-sensitive. When concrete trucks are running every 6.6 minutes, when turbine convoys are crawling along a narrow road, and when sections of the R492 and R439 are closed for trenching, my ability to reach the people who depend on me will be directly affected. The transport assessment does not address the impact on community healthcare workers at all.

Can the road physically take this traffic? These are historic, un-engineered rural roads without deep structural foundations. Two years of heavy axle loads will cause pavement failure, edge breaking and damage to the road body. The developer has not carried out any independent before-and-after structural surveys of the historic bridges and culverts on the haul route.

Narrowness and the Sharavogue crossroads. The developer's own documents admit that the public road at Sharavogue crossroads, which is on my doorstep, cannot physically accommodate the turbine delivery vehicles without going onto private land using temporary hardcore. The delivery route for a major industrial development depends on improvised infrastructure at a junction I use every single day. Computer simulations do not reflect what this means on a real road with real hedges, walls, school buses, farm vehicles and pets.

The Blackbull junction. Where the R492 meets the N62 at Blackbull is a serious safety hazard. The N62 carries traffic at 100 km/h. When slow heavy construction vehicles and oversized turbine convoys try to turn off it onto the narrow R492, traffic will back up onto the national route. School buses, farm machinery, ordinary commuters and emergency vehicles, including those that might be needed for the clients I care for, will be caught in those queues.

Noise on the road and safety. Noise from a continuous stream of HGVs will rise sharply. Walking the road which I do regularly, with my pets, will be considerably more dangerous. This is a road without footpaths.

Two to three years of an industrial construction operation on a road that was never designed for one cannot be described as "imperceptible." The transport assessment is not consistent with the reality of living, working and caring for people from this road.

2. The local wildlife — particularly the owls

Within three months of moving to Sharavogue in 2021, I saw a barn owl sitting in the tree in my front garden, and a long-eared owl flying over the bog. To see either of those birds in person is rare in Ireland today. To see both, within weeks of moving in, was something I have never forgotten.

Since then, owl boxes have been put up around the area, and only in recent weeks a barn owl has been confirmed using one of them to nest. This is not something that happened by accident. People in this area have taken an active role in supporting the recovery of the barn owl population. Most of my neighbours have owl boxes on their property. The children of the area have engaged fully with the project — they understand which boxes are theirs, they know which birds have been seen, and they take real pride in being part of the restoration. What is happening on this small patch of west Offaly is one of the genuine conservation success stories in Ireland today. It is the highest density barn owl area in the country, and the recovery has been driven by ordinary people, on their own land, with their own money, alongside their children.

To permit, in the middle of that, an eleven-turbine industrial development for which not a single nocturnal owl survey was carried out when one of those turbines sits 160 metres from a confirmed nest would be to undo years of voluntary community conservation work. I would be heartbroken if this development meant the end of these birds in our part of Offaly. So would my neighbours. So would the children. This is not a small concern. It is supported by a great deal of evidence the developer has either ignored or simply not gathered.

West County Offaly, the area where this wind farm is proposed, has been identified by BirdWatch Ireland as containing the highest density of breeding barn owls anywhere in Ireland. The 10 km grid square covering most of the Ballincor site contains at least six confirmed breeding pairs. The entire Irish barn owl population is only 562 to 702 breeding pairs nationwide. Barn owls are Red Listed on the Birds of Conservation Concern Ireland list and they are legally protected under both the Irish Wildlife Acts and Article 5 of the EU Birds Directive..

The developer's argument that the owls are safe because they hunt close to the ground and turbine blades sweep higher is simply wrong. Yes barn owls do hunt low but they do not stay low. When they commute between their nest and their hunting grounds they fly at considerable height on fixed, regular flight paths. Any turbine placed between a nest and a feeding area will be in that flight path, at rotor height. A nest at 160 metres from a turbine means that owl will fly through the rotor zone regularly and predictably.

Barn owls also have what is sometimes called sensory blindness in flight: they hunt by listening, and their silent flight means they have no auditory cue to detect or avoid spinning turbine blades coming the other way. With a national population this small, the loss of even a small number of adult breeding birds is a serious national conservation problem.

On top of all this, the developer never carried out a single nocturnal survey for a nocturnal bird, across a six-year survey period. No night-time vantage point watches, no acoustic monitoring, no dusk or

dawn transects. Their own report admits that daytime surveys cannot properly detect a nocturnal species. They had no night-time data, so they concluded there was no risk because they had no data.

The long-eared owl I saw flying over the bog is another protected species that depends on the same kind of habitat, open ground for hunting, woodland edge for roosting, and undisturbed bog. The biodiversity assessment for this development confirms that significant areas of bog woodland, scrub and cutover bog along the southern edge of the site. These habitats directly support owl species and will be permanently destroyed.

I do not want to be part of the generation under whose watch the owls disappeared from this corner of Offaly. The assessment for these birds is incomplete, the survey work that was legally required was not done and the developer's conclusion of no significant effect is not supported by their own evidence.

3. Noise and lights from the turbines — physical and mental health effects

I work occasional night shifts as part of my role as a community mental health nurse. After a night shift I sleep during the day. Like anyone who works shifts, the quality of my sleep and my ability to function safely on the road and in clinical settings the next day, depends entirely on my home being a quiet, dark place to rest. This is currently true of where I live. The proposed turbines would change that.

The measured night-time background noise in this area is approximately 17 to 19 dB(A) at low wind speeds. That is effectively silent. The clinical research on sleep disturbance from wind turbine noise consistently finds that adverse effects are most pronounced in exactly this kind of quiet baseline environment, where there is no other sound to mask the turbines. The gap between the silence I currently have and the level at which sleep architecture is measurably affected is very small.

Sleep disruption is the single most consistently documented health effect of wind turbine exposure in the literature and in the media. Independent research has also identified the swooshing or thumping character of turbine noise as one of the most significant variables for adverse sleep effects. The developer's own noise chapter acknowledges that amplitude modulation is an inherent characteristic of these turbines but does not properly assess it.

As a shift worker, my exposure to turbine noise will be during daylight hours when I am trying to sleep, as well as at night. There is no time of day at which this development would not affect me.

The noise limits the developer relies on come from the Wind Energy Development Guidelines 2006, which were written for turbines about half the size of the ones now proposed. The World Health Organisation Environmental Noise Guidelines for the European Region (2018) recommend night-time noise limits significantly lower than the 2006 Irish guidelines. The Offaly County Development Plan requires consistency with the WHO 2018 guidelines for the Offaly part of this project. No calculations showing compliance with WHO 2018 were provided.

As a mental health nurse I see every working day what chronic stress, sleep deprivation and lack of control over one's environment do to people's mental health. The peer-reviewed literature on residents

near wind turbines consistently records chronic stress and anxiety among the most frequent self-reported health effects. Chronic, uncontrollable exposure to noise and low-frequency vibration activates the body's stress axis, producing sustained elevated cortisol and autonomic arousal. There is no off switch. I am not prepared to have this introduced into my own home, and I am not prepared, as a clinician, to accept that the developer's assessment which contains no proper assessment of mental health impact on residents has done enough.

On the question of lights: the turbines proposed for Ballincor are large enough that aviation warning lighting is likely to be required on them. Red flashing aviation lights, visible across the surrounding countryside at night, would be a permanent and unavoidable visual intrusion. I bought my home for the dark night sky and the quiet of the bog. Replacing that with eleven flashing red lights, on and off all night, every night, for the 35-year life of the development, is a fundamental change to the place I chose to live.

I am asking An Coimisiún Pleanála to require:

- An assessment of the specific health impact of sleep disruption on shift workers and other vulnerable groups within the receptor zone;
- Independent, proactive noise monitoring for the operational life of the development — not a developer-operated complaints system;
- Full disclosure of any aviation lighting that will be required, with an assessment of its visual impact at night on residents.

Conclusion

The road I live on cannot safely carry this construction. The barn owls I have personally seen in my own garden are protected at the highest level under Irish and European law, and the survey work that was legally required to assess the risk to them was not carried out. The noise environment I depend on for sleep after night shifts will be measurably degraded, and the mental and physical health consequences of that have not been properly assessed.

For these reasons, I respectfully ask An Coimisiún Pleanála to refuse permission for the Ballincor Wind Farm and all its associated infrastructure.

Yours sincerely,



Elizabeth Burke