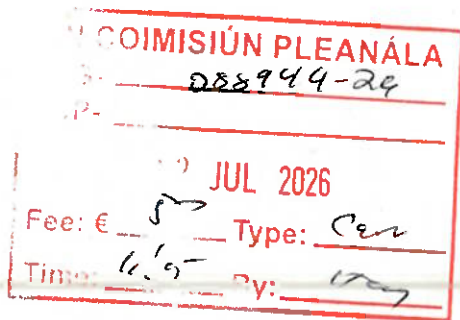




Gerry and Sinead Mahon
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An Coimisiún Pleanála
32 Marlborough Street
Dublin 1
D01 V902

16 June 2026

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

Dear Inspector,

We are writing to object to the above application. We live in the Rathbeg area of County Offaly, and this is our first home together. We bought it in 2017 and we fell in love with it, the views, the quiet country laneway, the bog stretching out below us, and the peace of it. We have two children, aged four and seven, who have grown up here. Every week we take them down by the edge of Sharavogue Bog on what they call their nature walk, looking out for birds, listening, watching the bog mist lift on a clear Offaly morning. We have heard the cuckoo several times out there. One day we counted four kestrels hovering with their young. The whooper swans pass over regularly and land in their hundreds in a field close to where Turbine 1 is proposed. This is not background to our objection. It is the objection.

Sharavogue Bog SAC sits with its boundary ten metres from the proposed site. It is one of the finest raised bogs in the country and is a Priority Habitat under European law. The State is actively restoring it right now. The question the law asks is a simple one: will this development harm that bog? If it will, or if that cannot be ruled out, then the permission cannot be granted. The developer has taken away its own ability to argue that some harm might be acceptable. That means the bar is a clean one. No harm, or no permission. We do not think the developer has come close to clearing that bar. The risks from drainage changes, peat disturbance, construction vibration and altered water movement through the bog during an active restoration programme have not been properly examined. We ask the Inspector to look very carefully at whether the Appropriate Assessment in this application genuinely answers that question to the standard the law requires.

The whooper swans we watch coming in over the fields near Turbine 1 are not something we mention lightly. Whooper swan is listed under Annex I of the EU Birds Directive, which means they carry the highest level of legal protection available under

European wildlife law. They winter here from Iceland, arriving from October onwards in family groups, and the flocks that land in the fields around this site number in the hundreds. They are not a species that adapts easily. Research is clear that whooper swans are among the bird species most vulnerable to wind turbine collision and displacement. Their flight pattern is part of why: they typically fly at low altitude, between five and thirty metres above the ground, on their daily movements between roosting and feeding sites. That puts them directly in the rotor sweep zone of modern turbines. They are also heavy, not particularly manoeuvrable in flight, and they have a narrow field of forward vision, which makes detecting obstacles harder. Dawn and dusk, which is when they move most, is when the light is poorest. International research and EU-level guidance is unambiguous that whooper swans are at elevated risk from turbine collision at sites like this one. The EIAR does not, in our view, assess that risk with anything like the seriousness it deserves, for a species this legally protected and this physically vulnerable, landing in their hundreds in a field metres from the proposed turbine foundations.

We are identified in the receptor register as H065, with our nearest turbine, T08, at 1.74 kilometres. Our home sits at 62.8 metres elevation, placing us 11.8 metres above the base of the turbines. That matters. When you stand at our living room window or sit in our main bedroom, you are looking out across the bog from above it. All eleven of the proposed turbines will be visible from our home. We can already clearly see the Knockshegowna turbines at 4.3 kilometres away and can sometimes hear them depending on the wind. On a clear day we can also see turbines in the direction of Roscrea and Nenagh. What the EIAR does not honestly reckon with is that this development would not simply add turbines to a view that already has some in it. It would place eleven 180-metre structures across the immediate foreground of a landscape, the bog, the fields, the open Offaly sky, that is the reason we are here at all. We bought this house because of that view. It was not one factor among several. It was the thing.

The visual impact assessment in this application is, in our view, one of the most misleading parts of the entire submission, and we want to explain why.

Photograph 1 below is taken from Viewpoint VP23b in the developer's own Landscape and Visual Impact Assessment. It shows Rathbeg Lane from behind a high hedge, with a red bin filling the foreground. If you look carefully at the middle ground on the left of that photograph, our house is just about visible. There is also a blade tip, if you look very closely, in the middle ground above the bin. But the turbines are almost nowhere to be seen. An inspector reviewing this image would reasonably conclude that the visual impact on this area is negligible. That conclusion would be wrong.



Photograph 1: Viewpoint Ref VP 23b (From application). Our house is just visible in the middle ground left. A blade tip is barely discernible above the bin. The turbines are otherwise invisible.

Photograph 2 is also from the developer's application, Viewpoint VP23a, taken nearby. Here the turbines are shown fully, right across the horizon. But now our house has gone. The angle chosen places us outside the frame. So the developer has produced two photographs of this area. One shows our house, with barely a trace of a turbine. The other shows the turbines, with no house in sight. At no point in the entire visual impact assessment are our home and the proposed turbines visible in the same image. An inspector reviewing these photographs would have no way of knowing what eleven 180-metre turbines will actually look like from where we live.



Photograph 2: Viewpoint Ref VP 23a (From application). The turbines are prominent across the full horizon. Our house does not appear.

Photograph 3 was produced by Greater Birr Wind Action Group, of which Gerry has been a member since it was set up last October. The group put real money into commissioning this work properly. The software used is the same professional photomontage software that wind energy developers use for their own assessments, and the person operating it received formal training before producing these images. This photograph was taken from Rathbeg Lane, which is a public road. Our house is the first house visible in the middle ground on the right. The turbines are right there behind it, across the full width of the horizon. This is what the developer could have shown. They chose not to.



Photograph 3: Greater Birr Wind Action Group photomontage, Rathbeg Lane. Our house is the first house in the middle ground on the right. The Ballincor turbines are clearly visible behind and around it.

We ask the Inspector to carry out a site visit to Rathbeg Lane. No photograph fully captures what this landscape looks and feels like from where we live, but standing here makes it immediately clear.

Because our home sits above the bogland and faces toward the proposed site from an elevated position, shadow flicker is a real concern. The developer's shadow study ends at 1,630 metres. At three degrees of sun elevation, shadows from turbines of this height can reach 3,435 metres. Our property at H065 sits outside the study boundary, which means the flicker effects on our home were never assessed at all. Given our elevation relative to the turbines and the orientation of our living room and main bedroom, that gap is not acceptable to us. We are not claiming a confirmed exceedance. We are saying the developer should have found out before asking the Inspector to approve this.

The noise question worries us, and we want to be honest about what we know and what we do not. We can already hear the Knockshegowna turbines from 4.3 kilometres away on certain wind directions. The proposed turbines at Ballincor would be more than twice as close and three times the height. The developer's noise assessment uses the IoA Good Practice Guide methodology but has not applied the JOULE valley correction required under section 4.3.9 of that guide. When that correction is applied to the developer's own figures, it produces ten confirmed exceedances across the receptor network. Our property H065 is designated NML3 in the noise modelling. We are not saying with certainty that our home would see an exceedance. But we are not satisfied the assessment as submitted tells us it would not, because the methodology used is incomplete. The WHO 2018 guidelines on environmental noise are also referenced as a requirement under Offaly County Development Plan policy DMS-109,

and those guidelines were never assessed by the developer. That matters to people who sleep with their windows open in summer.

We have read about families who have had to leave their homes because of noise from nearby wind turbines. We know that claim gets dismissed and we are not repeating it as established fact. But the research behind those experiences has been moving in one direction for several years now, and it is worth the Inspector knowing where it has got to. A Swedish professor, Ken Mattsson of Uppsala University, has spent years measuring how infrasound from large turbines actually travels through landscapes, and what he has found is that it goes much further and at much higher levels than the methods used in standard planning assessments have ever suggested. Those standard methods, it turns out, use a measurement scale that was never designed to capture low-frequency sound and simply misses a large part of what turbines produce. In October 2025 this research reached the European Parliament, where a formal petition from organisations across several EU countries called for a proper common European framework on wind turbine noise. The EU Environment Committee started gathering evidence. In March 2026, weeks before this submission closes, a conference called Unheard but Not Harmless: Public Health and Wind Energy Infrasound was held at the European Parliament in Brussels. Professor Mattsson presented there and made the point that infrasound levels are higher at night, when it travels further and gets into buildings more easily, and that the effects include sleep disturbance, migraines and general ill-health over time. This is not a fringe argument anymore. It is peer-reviewed research being examined at EU level right now. The turbines proposed at Ballincor are exactly the kind of large modern turbines this research is about. This application contains no infrasound assessment. We ask the Inspector to require one.

The R492 is the road our son travels to school and our daughter to pre-school in Shinrone. We make that journey four times a day, every school day. It is also identified as the main access and delivery route for the proposed site. Construction of a wind farm of this scale involves very substantial heavy vehicle movements over an extended period. We have seen no assessment that satisfies us that a road used daily by schoolchildren, farm traffic, and local families can absorb that level of construction traffic without serious risk. A construction programme that puts heavy plant on the R492 four times a day past our children is not something we can accept without a proper, independent traffic and road condition assessment. We have not seen one in this application.

We want to say something honest about what this development means for our family and for this small community, not just in terms of property values but in terms of what kind of place this will be in twenty or thirty years time. We bought here in 2017 because this was a special place to raise children. Every parent wants their children to feel that there is nowhere like home. The idea that our children might grow up grateful to eventually move away, to get a proper night's sleep, to escape the noise and the flicker and the constant turn of blades on the horizon, is something we find genuinely hard to

sit with. And it goes beyond our own family. When a place like this stops feeling like somewhere worth staying, young families stop choosing it. Nobody new moves in. The community hollows out slowly and quietly and by the time anyone notices it has already happened. We raise this not to be dramatic but because an Inspector who has read this far deserves to know what is actually at stake for the people who live here.

The Offaly County Development Plan says this area is not suitable for wind energy development. It is in the red zone of the Wind Energy Strategy. That was not a casual decision. It went through the full planning process and it means something. The Supreme Court's decision in Coolglass last year confirmed that a designation like this one carries real legal weight and that a developer who wants to go against it has to make a serious case for why it should be set aside. We have read this application carefully and we do not find that case being made. What we find instead is an Appropriate Assessment that does not honestly answer the question it is supposed to answer, bird surveys that missed species and movement patterns that matter, a noise methodology with a known gap in it, a shadow study that stopped short of our house, and a visual impact chapter that never once shows our home and the proposed turbines in the same photograph. That is not a case that justifies departing from the County Development Plan designation.

We are asking the Inspector to refuse this application. We understand why renewable energy matters and we are not against it as a matter of principle. But this site, beside an SAC that is still being actively restored, in an area the County Development Plan has designated as unsuitable, within two kilometres of homes where young families are trying to build a life, is the wrong place. The bog below our house, the kestrels we counted hovering last summer with their young, the whooper swans coming in low over the fields in October, the quiet of a clear Offaly morning. These things have value. They are not replaceable. And if this permission is granted, they will be gone.

Yours faithfully,

Gerry Mahon
Gerry Mahon

Sinead Mahon
Sinead Mahon