

AN COIMISIÚN PLEANÁLA
LDG- 088456-24
ACP- _____
02 JUL 2026
Fee: € 50 Type: C4
Time: 11:15 By: Han

Hazel Perdue

Loughkeen

Carrig

Birr

Co Offaly R42W867

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

To whom it concerns,

My name is Hazel Perdue. I grew up in Loughkeen and it has been my home for 65 years. My house is a listed building, constructed in 1820 as the Rectory to Lockeen Church. The nearest proposed Ballincor turbine is approximately 1,100 metres from my home. I also live under the existing Knockshegowna wind farm — I can see four of those turbines from the front of my house, and I have lived with their effects every day and every night for years. I am writing as someone who knows from direct daily experience exactly what this kind of development does to a person, a home, a farm, and the wildlife that depends on the land. I am not speculating about future harm. I am already living with it.

An endangered native breed was never considered

I breed Irish Draught horses. I inherited this from my father, who bred Loughkeen Dancing Lord — Horse of the Year Show winner in the UK six years in succession. The Irish Draught is Ireland's first traditional working horse and a native horse breed. It is classified by the United Nations Food and Agriculture Organisation as endangered maintained, and the breeding tradition itself is listed on Ireland's National Inventory of Intangible Cultural Heritage, maintained by the Department of Housing, Local Government and Heritage. Fewer than 1,000 purebred foals are registered in the entire country each year. The breed survives only through the active conservation effort of breeders like me, supported by Horse Sport Ireland, the Irish Draught Horse Society of Ireland, the Royal Dublin Society and the Irish Cattle Breeding Federation.

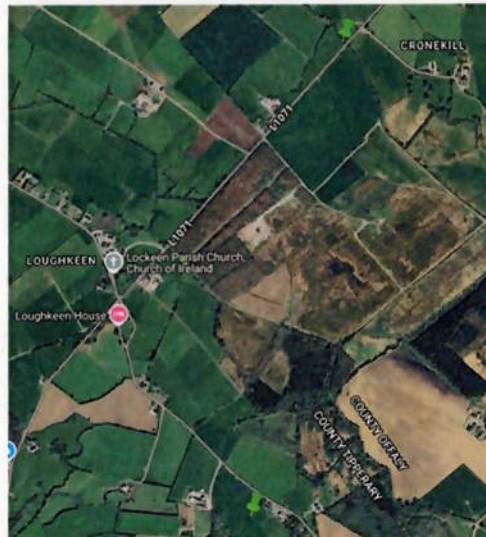
Nowhere in RWE's Environmental Impact Assessment Report, not in the shadow flicker chapter, not in the noise chapter, not in the cultural heritage chapter, is the Irish Draught mentioned. Not once. The conservation programme they are part of was treated as if it did not exist. The listing of the breeding tradition on the State's own Intangible Cultural Heritage inventory was treated as if it did not exist. These animals

are a national heritage asset. Every purebred foal born here is a contribution to a studbook that is running critically low.

Sustained cortisol elevation in mares , the kind produced by chronic, unavoidable, intermittent stress is associated in peer-reviewed equine research with impaired conception rates and early embryonic loss (Nagel et al., 2012, *Theriogenology*). The Irish Draught's famously calm temperament does not exempt it from this physiology. A foal that is not born here because shadow flicker, ground vibration or low-frequency turbine noise disrupted a mare's breeding season is not replaceable from the market. It is a loss to a national studbook.

The shadow flicker assessment is materially defective at this property

My property is Receptor 31 in RWE's shadow flicker assessment. Table 16-1 of the EIAR reports zero shadow flicker days at this property and presents it as unaffected.



I include 2 Visual impact images (see green pins above – location of these images) closest to my property to give you some idea of the visual impact from my home and farm every day. We are elevated so have no natural screening available to us.





RWE's own WindPRO software output, in Appendix 16-1, records that shadow flicker occurs here on **59 days every year** — nearly two months. The Table 16-1 figure shows zero only because none of those 59 days breach the 30-minute daily threshold designed for human residents of buildings. A document that presents 59 annual shadow days as zero is not a document on which a 25-to-30-year planning permission can safely be granted.

Compounding this, RWE modelled only one turbine (T03, at 1,164m) against my property. Turbine T02 sits at 1,707m — 77 metres outside the 1,630m study boundary — and was excluded for that reason alone. T02 is geometrically identical in character to T03; its blade bottom sits below the observer's eye level; its arc points at this property. It was set aside on an administrative threshold, not a substantive one. And the entire assessment was carried out against the building, not against the paddocks and fields where the horses are actually kept. The 30-hour annual and 30-minute daily thresholds were developed in 1990s Germany for human residents. They have no validity for equine welfare, and no relationship whatsoever to the reproductive health of a conservation breeding herd.

I am already being harmed by Knockshegowna. Ballincor will be worse.

I do not need to imagine what living under wind turbines does, because I am already doing it. Four of the eight Knockshegowna turbines disturb my sleep most nights — the sound is like a fridge generator humming persistently in the background and it does not stop. I get shadow flicker from Knockshegowna already; not every day, but regularly enough that I know exactly what it looks like and how it feels in my own house.

Over the last five years I have developed abnormal sleeping patterns and **a serious and progressing case of tinnitus**. I cannot prove in a courtroom that one caused the other. But I can tell An Coimisiún Pleanála that I have lived in this house for 65 years, that the tinnitus appeared and worsened in the period since the existing wind farm began operating, and that I am now being asked to accept eleven more turbines — larger turbines, closer turbines — on top of what is already harming me. I will be surrounded

by noise. There is no version of this development in which my health gets better. There is only the question of how much worse it will get.

I am not in a position to move. This is my home. I will have to live with whatever this Board decides for the rest of my life.

The endangered birds nesting on my farm

For the last three years I have hosted breeding Barn Owls on this farm. I put up two owl boxes to support the population. In that time we have had 4 chicks each year and we have chicks again this year. Every bird is ringed and recorded with Birdwatch Ireland. John Lusby visits regularly to track and ring them. The wider area within which the proposed wind farm has been identified as **the highest breeding area in Ireland for this endangered species**, and the population is growing locally because of the work that has gone into supporting it. The programme has been massively successful, is a source of great community and civic pride. We are a community now dedicated to the wildlife in our area which makes this proposal at this time all the more senseless.





I have also seen the white-tailed eagle on this land. I regularly see snipe and lapwing, and I hear the curlew - species in serious national decline. None of this is accidental. It is the product of habitat that has been protected and farmed sympathetically over decades. Construction and operation of eleven industrial turbines adjacent to a confirmed national stronghold for breeding Barn Owls is not a marginal ecological question. It is a direct threat to a recovering population of a Red-listed species.

A nationally significant bat population

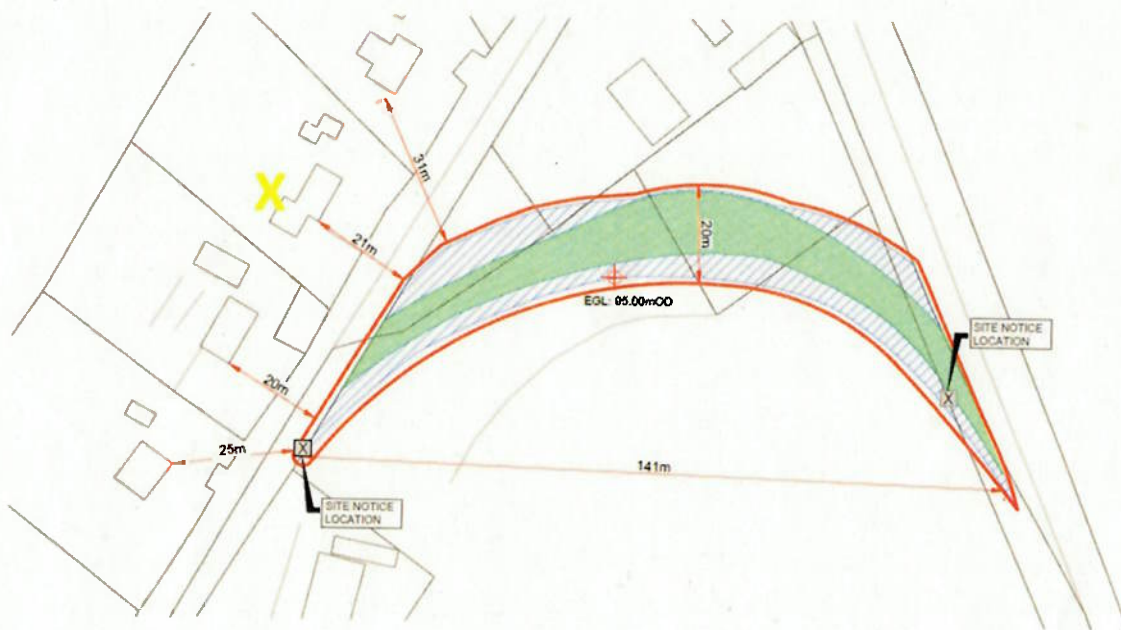
The bat population on this farm is so numerous and so diverse that we were selected for formal bat surveys, and the results placed our population **among the highest and most diverse in the country**. Bats are particularly vulnerable to wind turbine mortality — both through direct collision and through barotrauma. A development of this scale, in this place, will not coexist with the population we host. It will diminish it.

Visual encirclement

From this farm I face the prospect of being completely surrounded by industrial turbines: the eight of Knockshegowna behind me, the proposed eleven of Ballincor in front of me, the granted seven to the north in Carrig, with the Derrinlough windfarm also in view at a distance. There is no aspect of my home, my yard, or my paddocks that will be free of them. The cumulative visual impact assessment treats each cluster as a separate exercise. Standing on this farm, I do not. The valley is closing in on every side.

A listed building, and a listed living tradition

My home is a protected structure, built in 1820. The Irish Draught breeding tradition practised on this farm is listed on the National Inventory of Intangible Cultural Heritage. Chapter 13 of the EIAR addresses built heritage in the vicinity of the site but does not address living cultural heritage at all. It does not name the Intangible Cultural Heritage inventory. It does not name the Irish Draught. A 19th-century listed Rectory occupied by a breeder practising a State-listed cultural tradition, surrounded on three sides by turbines, has not been assessed in cultural heritage terms in any meaningful sense.



Separately I am the owner of a cottage at the Black Bull, Sharavogue, immediately adjacent to the proposed access point at the Black Bull, x marks my cottage in image above. The proposed temporary access road for the Ballincor Wind Farm development will be constructed in extremely close proximity to my cottage and its curtilage, and the level of excavation, heavy construction activity and sustained HGV traffic associated with it is wholly inappropriate beside an established residential property.

There has been no direct consultation with me as an affected property owner, no engagement on the location or impacts of the proposed route, and no information provided about the mitigation measures intended to protect properties along it. That alone is a serious procedural failure on a development of this scale and duration. The image above represents the full planning detail which is woefully vague.

I share, in respect of my cottage, every substantive concern of my neighbours at this location: noise, vibration, dust and disturbance over a prolonged construction period; the risk to water and electricity services serving my property and the road safety implications of routing substantial HGV movements onto a road network that is already narrow, already unsuitable for two heavy goods vehicles to pass safely, and already the scene of near-misses witnessed by residents.

Insufficient consideration has been given to alternative access arrangements that would not require the construction of a temporary road beside established homes.

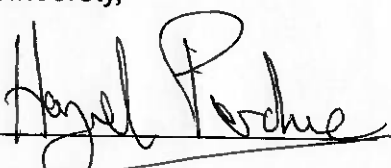
The wider damage

Beyond all of the above, the construction itself — the excavation, the volume of concrete poured into bog and peat, the access tracks, the haul roads, the heavy traffic over years represents a level of physical disruption to a sensitive landscape that the EIAR understates and the local road network cannot absorb. I will not repeat in detail what neighbours and other objectors have set out in respect of the bog, the river and the flooding, but I support those objections fully and note that the same construction footprint that threatens those features threatens the wildlife I have described above.

I am asking An Coimisiún Pleanála to **refuse** this application. The shadow flicker assessment, the noise assessment and the cultural heritage assessment are each materially incomplete in respect of my property. None of them identified, acknowledged, or assessed the impact of this development on a conservation breeding operation for an endangered native breed whose tradition is listed on the National Inventory of Intangible Cultural Heritage. None of them grappled honestly with the fact that this property already records 59 shadow flicker days a year from a single modelled turbine, with a second within-arc turbine excluded by 77 metres. None of them grappled with the harm already being done to my health by the existing wind farm I live under.

The Irish Draught is Ireland's national horse breed. It is endangered. It is being actively conserved on this farm, as it was by my father before me. A property contributing to that conservation effort, in a listed building of national age, hosting a nationally significant Barn Owl population and one of the country's most diverse bat populations, is not a standard residential receptor. It was assessed as one. **That is not good enough.**

Yours sincerely,


Hazel Perdue