

AN COIMISIÚN PLEANÁLA
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Lee Deane
Corolanty
Shinrone
Birr
Co. Offaly
R42 AE77

An Coimisiún Pleanála
32 Marlborough Street
Dublin 1
D01 V902

30 June 2026

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

Dear Sir/Madam,

I have lived at Corolanty, Shinrone for almost 10 years. My wife and I have two children, aged seven and fifteen. I work as a mobile mechanic, covering roughly a forty-kilometre radius from my front door, and I also do some of my work from home. The house sits with three bedrooms and a living room facing out toward where these turbines would be built. My property is identified as Receptor 54 (reference H054) in the developer's assessment, and the nearest proposed turbine, T11, would stand 1.45 kilometres from where we sleep. I am writing to ask An Coimisiún Pleanála to refuse this application, and I want to explain why.

The noise assessment for my property is the part of this application I find most troubling. My property is designated H054, assigned to monitoring location NML4, and it sits at 72 metres above sea level, more than 23 metres above the base of the nearest turbine. My home looks across at and down on these machines. The ground drops between the turbine locations and my property, which is precisely the terrain profile that triggers the mandatory valley correction under Section 4.3.9 of the Institute of Acoustics Good Practice Guide. That correction is not optional. It is a required step under the methodology the developer's own consultants adopted. Using the developer's own turbine coordinates and elevations, the valley correction formula is triggered at my property by ten of the eleven proposed turbines. The developer never applied this correction anywhere in the nine noise documents submitted with this application. When it is applied at properties where a predicted level does exist, ten homes across the site show confirmed night-time exceedances. My property should have been assessed, the correction should have been applied, and the result should have been disclosed. None of that happened. I am left unable to tell An Coimisiún Pleanála whether my

home will exceed its noise limit at night, because the developer has not given me the information I would need to answer that question.

Beyond the missing data, Offaly County Development Plan policy DMS-109 requires that wind turbine noise be assessed against the 2018 WHO Environmental Noise Guidelines. That assessment was never done. The WHO guidelines are stricter than the limits the developer used, so properties that pass the developer's standard may fail the standard the County Development Plan actually requires. I sometimes sleep with a bedroom window open in summer, and the main bedroom faces toward the proposed turbines along with my children's rooms. I do not consider this noise assessment adequate, and I do not think the Board should either.

The developer's own model records no shadow flicker at my property. I note that finding, but I have limited confidence in the assessment that produced it. An independent review of the shadow flicker chapter found that the developer stated that they used sunshine probability data from a station over 60 kilometres away, using old weather data. A Met Éireann station at Gurteen, 4.5 kilometres from the site, records 27.5% more annual sunshine and was never used. The independent review also found that the developer's report describes a terrain screening calculation as having been carried out, when the developer's own software files show it was switched off. My home sits above the blade bottom height of ten of the eleven proposed turbines. The shadow flicker model was built on data I do not trust, and I do not think it can be relied on as a demonstration that my home is unaffected.

I am a mobile mechanic and my livelihood depends on being able to move. Every morning I load up and go, servicing breakdowns and repairs across every road in this area, the R492, the R439 between Birr and Banagher, the L1071, the N62, the R433, and the smaller lanes in between. My reputation rests on arriving quickly. A customer broken down on a back road is not wanting to be stranded for hours. The construction phase for a development of this scale will bring abnormal loads and heavy machinery onto roads that are already narrow, and the routes I depend on for a fast response will be compromised. I have not seen any traffic management plan in this application that takes seriously the impact on working people who use these roads every day, several times a day, not occasionally, but as the means by which they earn their living.

The visual impact of this development on our home is something I feel strongly about. My home sits on elevated ground looking across at the proposed turbines, and from my position every one of the eleven machines will be visible against the skyline. Three bedrooms and the living room face directly toward the site. I chose to live here partly because of the landscape, the Slieve Bloom on one side, the bog on the other, and it is genuinely beautiful. Knockshegowna Wind Farm is roughly four kilometres from us and I am aware of it in the landscape but it does not dominate. What is proposed here is closer and at a fundamentally different scale. Eleven turbines at 180 metres tip height, visible from the rooms where my family lives, would change what this place looks and feels like. I also think this matters for the

value of the property. I am not going to pretend I can put a precise figure on it, but I bought here for the setting and the landscape, and I do not think it is unreasonable to say that a house looking out at a close-range wind farm is worth less than the same house was before. That is a real loss for our family and I think it deserves to be acknowledged.

The owls at the rear of our garden are something I think about in all of this. They fly over the children's tree house regularly and our youngest in particular has grown up with them. I raise this not as a standalone planning argument but because it reflects something genuine about this place and the wildlife that shares it with us. The broader ecological picture in this application is, I think, seriously deficient. The developer's own biodiversity assessment accepts that this development will result in the total loss of the local breeding population of marsh fritillary, a butterfly protected under EU law. The proposed solution is to move them to a different site and then move them back. That plan cannot work. No devil's-bit scabious was found at the other site, and that plant is the only one the caterpillars can feed on. The butterfly conservation body whose own guidance the developer cited in the application states clearly that translocation to allow the destruction of occupied sites is not acceptable. The developer cited that guidance and then proposed exactly what it prohibits. The Slender Bog Cotton is protected under the Flora Protection Order growing in the part of Sharavogue Bog SAC closest to the construction works. The developer described it as being sufficiently far from the works to need no further assessment. The NPWS records show that it is at the bog edge, which is the strip most directly exposed to any disturbance of the groundwater system. The developer itself identified this as a pathway for construction effects. The report then claims that no further assessment is needed, a claim that cannot be accepted in my view.

The bird survey record underpinning this application is not adequate for a site of this sensitivity. Six years of surveys were carried out, and almost none of that survey effort was at dawn or dusk. The developer's own collision risk expert confirmed in writing that the surveys did not cover bird activity at the times when the most vulnerable species are most active. For whooper swans and golden plover, the critical movement periods are before sunrise and after sunset, and those periods are almost entirely absent from the data. Six of the species that are qualifying interests of the River Little Brosna Callows Special Protection Area received no individual collision risk assessment in this application at all. The developer's own model records twenty-five separate limitations and uncertainties. That is twenty five limitations that they openly admit to in their study. Curlew were confirmed breeding in this area in the 2025 season, using survey methods the developer never employed across six years of fieldwork. Ireland has approximately 105 breeding pairs of curlew remaining. The NPWS has stated on record that losing one pair is close to one per cent of the national breeding population. No targeted dawn survey for curlew was conducted at any point in this application process. That is not a precautionary approach and it is not a complete picture of the risk.

The wind energy element of the Offaly County Development Plan designates this area as unsuitable for wind energy development. That designation is not a preliminary position that

applicants are free to argue around. Since the Coolglass ruling, planning authorities and An Coimisiún Pleanála are required to give that due diligence. This application has not demonstrated any basis on which the CDP policy should be set aside. That designation was given to this site because of high scenic sensitivity, elevated topography, below average wind speeds, recurring flooding, the Little Brosna SPA and Sharavogue SAC and those reasons still stand. No amount of postering from the applicant will change the structural and physical characteristics of this site.

I am asking An Coimisiún Pleanála to refuse planning permission for this application. There are problems with the shadow flicker data, the biodiversity proposals, the bird surveys and the CDP designation, and I have set them out above. But the matter I keep coming back to is the noise. The developer's own consultants adopted a methodology that requires the valley correction. They did not apply it. When it is applied, ten homes on this site exceed their night-time noise limits. My home was never given a predicted level at all, so I cannot even check whether mine is the eleventh. That is not an adequate basis on which to grant permission for a development that will operate through every night for the next twenty-five years beside the bedrooms where my children sleep.

Yours faithfully,

Lee Deane

A handwritten signature in cursive script, reading 'Lee Deane', written in dark ink.