

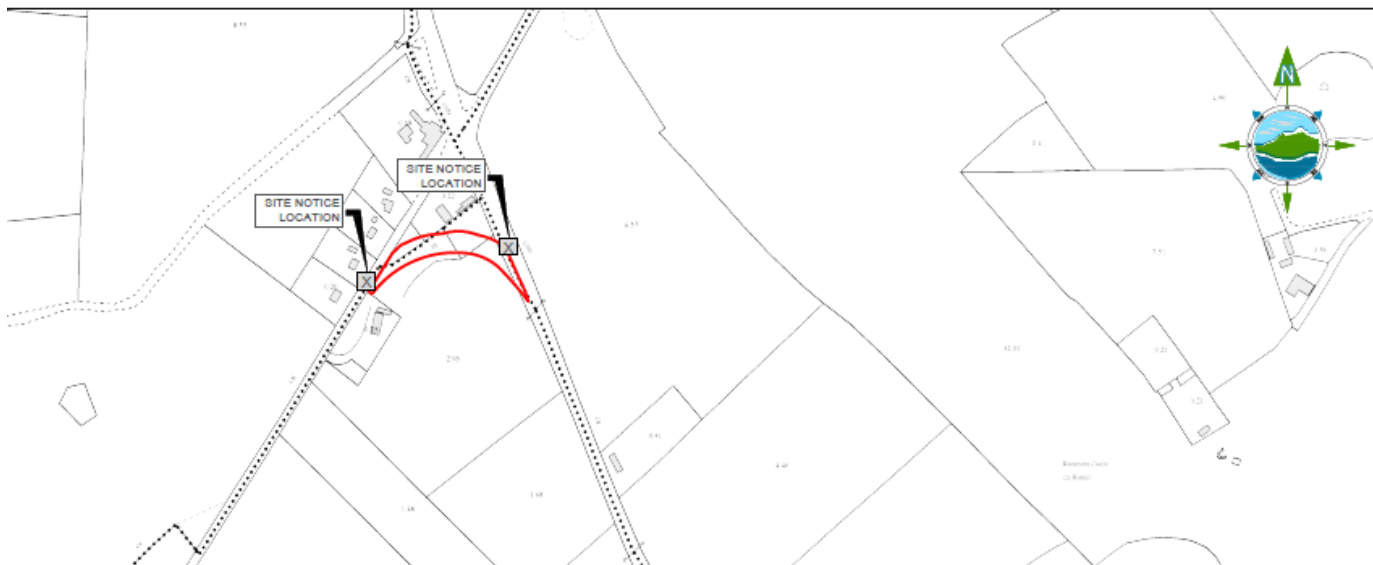
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02/07/2026

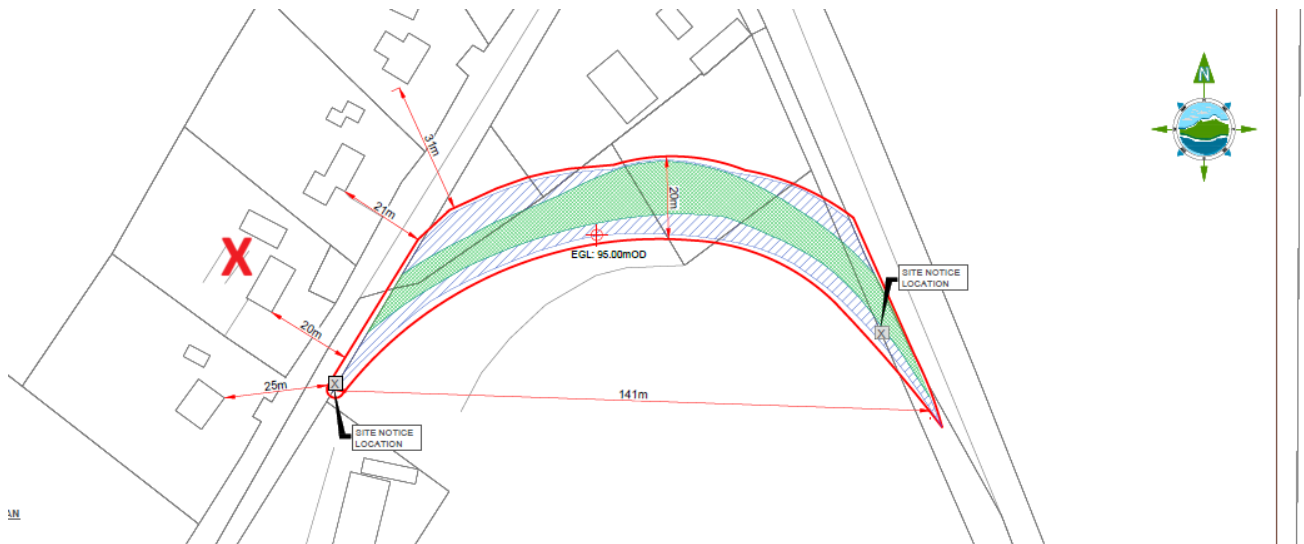
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

**Re: Objection – Planning Application PAX 92.324279 – Ballincor Wind Farm, Co. Offaly / Co.
Tipperary (temporary access road and impacts on the Little Brosna River)**

Dear Inspector,

I am writing to object to the proposed Ballincor Wind Farm, and in particular to the temporary access road that forms part of the application. I have lived at Sharavogue for many years.





Note the distance measured from development boundary to the wall of my home is 20m and closer still to the curtilage of my home – the ground I use every day. I have read what has been submitted, and I do not believe it comes close to justifying works of this scale being carried out this close to a private residence.

I want to begin with the consultation, because it colours everything that follows. There was no initial contact with me and no consultation of any kind before this proposal took shape. I only became aware of it through conversation in the local community. I received no meaningful engagement on the location of the road, on the impact to nearby homes, or the mitigation that would be needed to make it tolerable.

The road is to be built immediately beside the curtilage of my home and within a few metres of areas outside my home. The scale of excavation, the heavy construction activity, and the HGV traffic proposed at that distance from a dwelling are wholly inappropriate. Noise, vibration, dust and disturbance on that scale, sustained over a prolonged period and this close to the house, would make normal life at home impossible for the duration of the works. The application contains very little detail on how a home in this position would be protected, and no assessment I can find that treats my house as the near receptor it plainly is.

The works also threaten the services my home depends on. The water supply serving the house may be directly affected by the excavation for the road; any interruption or damage to it would leave my household without water. Nothing in the documentation explains how this infrastructure will be protected, maintained or, if necessary, relocated, and there is no contingency plan set out for the event of a service failure during the works.

I am particularly concerned about ground stability. The extent of excavation and soil removal needed to build this road, carried out this close to my dwelling and its curtilage, raises a real risk of subsidence and ground movement affecting the house. Before any approval could be contemplated, a full independent structural and geotechnical assessment of my property should be required, together with a condition survey carried out before a single machine arrives on site, so that any damage caused by the works can be identified and put right.

The road safety concerns are just as serious. The existing roads in this area are narrow and were never built for the volume of heavy construction traffic this development would bring. In places two HGVs simply cannot pass each other without difficulty. Adding substantial construction traffic to these roads will put residents, pedestrians and other road users at real risk, particularly at the points where vehicles turn into and out of private entrances, including my own. I do not believe adequate consideration has been given to alternative access either. There is existing road infrastructure in the area that, in my view, could serve the site without the need to drive a new temporary road up against established homes like mine.

Beyond my own private issue I have deep concern for the impact of the bigger wind farm development on the River Brosna. I have fished the Brosna for years. I know that stretch of water as well as anyone. On more than one occasion, otters have come up onto the bank close to where I was fishing and stayed there, unhurried, going about their business a few feet from me. I mention this because the developer's own ecological survey treats otter presence on this river as marginal – it records a single potential holt as inactive, and it admits that much of the drainage and ditch network could not even be accessed because of the depth of the bog. A survey that could not reach the ground it was meant to assess, and which concludes near-absence, does not match what I see with my own eyes on that riverbank. The otters are there. They use that stretch. That first-hand fact ought to carry weight against a survey the developer itself acknowledges was incomplete. They didn't see it because they never looked.

This matters in law, not just in sentiment. The otter is strictly protected under the Habitats Directive wherever it occurs, not only inside designated sites, and its holts and resting places are protected structures under the Regulations. It is also a qualifying interest of the River Shannon Callows Special Area of Conservation downstream. The developer's own assessment accepts that, without mitigation, disturbance to otters here would be a likely significant negative effect. When my own experience of otters on this bank is set beside a survey the developer admits was hampered by lack of access, I do not see how the Commission could be satisfied that this development is safe for the species.

The river itself is already in trouble, and the plan puts it at further risk. The Little Brosna is classified as being in Poor condition, and under water law no development may make an already-Poor river worse, even temporarily. Yet the assessment of harm to the river was carried out against a better baseline than the river actually has. One small stream running through the site to join the Little Brosna a short distance below has been rated as seriously polluted in the developer's own ecological survey, and nothing in the impact assessment responds to that finding. The pollution controls the developer relies on – settlement ponds and silt traps – depend on the site staying dry enough to manage. This floodplain floods every winter, reliably and for months. Will the mitigation strategies work in severe flood conditions? The turbine and construction locations closest to the river are the very ones the flood data shows will be worst affected. This is the stretch the otters feed on. The risk to the river, and to everything that lives in and along it, has not been properly assessed and has not been shown to be controllable.

For all of these reasons – the closeness of this road to my home, the risk to the structure of the house, the road danger, the failure to consult me at all, and above all the inadequate protection of a river I know well and the otters that live on it – I believe this development would cause a significant and

unacceptable impact on my home, my safety and my surroundings, and would put a protected species and an already-fragile river at real risk. I ask the Commission to refuse permission.

Should the Commission nonetheless be minded to consider approval, I respectfully ask that stringent conditions be attached, including at a minimum:

- A full independent pre-construction structural and geotechnical survey of my property and its curtilage, with an agreed condition record and a remediation mechanism for any damage caused by the works;
- A detailed traffic management and road safety plan addressing the narrowness of the local roads and the safety of access points to private homes;
- Effective dust, vibration and noise mitigation, with monitoring, given the proximity of the works to my house;
- A binding requirement that any other derogation licence be obtained, and any other hort survey completed with full site access, before – not after – any permission takes effect;
- Independent verification that river and stream sediment controls will function under the flood conditions this site experiences every winter, before any in-river or near-river works proceed;
- Ongoing environmental and structural monitoring throughout the works, with appropriate remediation and compensation for any damage, disruption or loss arising.

I ask that An Coimisiún Pleanála give full and careful consideration to the concerns set out above before any determination is made on this application.

Yours faithfully,

Michael Costello