

AN COIMISIÚN PLEANÁLA
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Nicky Joynes
Ballinamoe
Shinrone
Birr, Co. Offaly
R42 WP48

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

25th June 2026

Case Ref: Planning Application PAX 92.324279 — Proposed Ballincor Wind Farm, Co. Offaly

Receptor 109

To whom it may concern,

My name is Nicky Joynes. I have lived at this property in Ballinamoe, Shinrone, Co. Offaly, for 21 years. I live here with my son, and I keep horses on the property. I am writing to ask An Coimisiún Pleanála to refuse planning permission for the proposed Ballincor Wind Farm under reference PAX 92.324279.

We moved here 21 years ago for the peace and tranquility of the quiet countryside. I am surrounded by nature. The birdsong in the morning is something else. Ravens nesting close to the property. There are otters, swans and cygnets on the river, every year. Bats are commonplace and highly visible on summer evenings. I walk, I garden, I sit outside and listen to the birds and the wildlife. That is the place I chose for me and my son, and the reason I have stayed for 21 years. The character of this land — open bogland, big sky, quiet, is the reason this place is worth living in. None of that survives the development that has been proposed.

My home is identified as Receptor 109 (H109) in the developer's own register. The nearest of the proposed eleven turbines, T06, would stand approximately 754 metres from my house — the developer itself records me as the closest non-stakeholder residence to T06, the highest turbine on the site. Three further turbines sit within the shadow flicker study area at my home: T07 at 922 metres, T05 at 1,167 metres and T08 at 1,425 metres. There are already eight wind turbines at Knockshegowna, around 1.6 kilometres in from my property. The Carrig wind farm has been permitted further to the south-east. If Ballincor proceeds, I will be living inside a triangle of three wind farms — and the developer's own dataset confirms it.

I do not sleep as it is when the wind blows in my direction off the Knockshegowna turbines. They are 1.6 kilometres away. The proposed Ballincor turbines would be more than twice as close, on machines more than twice the height. The developer's own noise consultant predicts a cumulative

night-time noise level at my home of 42.3 decibels against an assigned limit of 43.2 decibels. That is a margin of 0.9 decibels — the narrowest margin recorded at any non-stakeholder residence in the entire assessment. There is no headroom in that figure. There is also no application of the +3 decibel valley correction that the developer's own chosen methodology (IoA Good Practice Guide §4.3.9) requires where the ground geometry meets a defined condition. The developer's own coordinates confirm the condition is met at all eleven proposed turbines as seen from my home. Adding the correction the methodology requires, on the figures the developer itself published, pushes the predicted noise at my home over the night-time limit. On the developer's own numbers, applied under the developer's own method, this development cannot lawfully operate at night at my property.

There is one further point on noise that should not be passed over. My home is the location from which the entire NML6 background noise baseline for this development was measured — the limits at every other NML6 property in the area were derived from data taken in my garden. Some time ago RWE placed what they called a "tester" in my garden. They did not really communicate with us. They did not really seem to care how we felt about it. That tester is the instrument the noise limits for the whole NML6 zone now rest on. Its measurements were conducted in summer only explicitly avoiding the wind speeds where the predicted noise at my home is at its worst (8 to 9 metres per second), the background data the limits are calibrated to is not measured at all — it is extrapolated. **A planning decision built on a limit projected from a summer survey, applied at a property where the margin against that limit is already 0.9 of a decibel, and where the correction the methodology requires has not been applied, is not a planning decision built on evidence.**

Shadow flicker is no better. The developer's own software records 39 hours and 52 minutes of shadow flicker per year at my home in the worst case — above the 30-hour annual threshold the planning system applies — with a single-day maximum of 41 minutes, above the 30-minute daily threshold, on 31 days of the year. Chapter 16 of the developer's report records those 31 days. The developer's own Appendix 16-1, on exactly the same model run, records 123 days of shadow flicker per year at my home. 92 of those days — days the developer's own software identified — do not appear anywhere in the chapter placed before the Board. They are days on which shadow flicker happens at my home for less than 30 minutes. The developer omitted them. For a property where the rotation of turbine blades will cast shadow through my windows on roughly one day in every three for the operational life of this development, that is not a small omission.

Of the four turbines inside my shadow flicker study area, two of them — T07 and T08 — sit only 6.5 degrees apart in the line of sight from my house. That is close enough that the sun passes behind both at once. The result is a daily compound shadow window of approximately 26 minutes on every suitable shadow day — a doubled, arrhythmic, two-turbine flicker the developer's 30-minute daily limit was never designed for. T06 and T05 produce a wider compound window of around 76 minutes a day. The developer has not assessed compound multi-turbine flicker at my property, or any other property, anywhere in this application. Further, because my home sits at 73.5 metres above sea level on slightly elevated ground, the blade bottoms of three of the four turbines within my shadow zone

— T07, T05 and T08 — sit below the level of the floor I walk on. The shadow flicker from those turbines arrives at the lowest sun angles. It is the longest, most horizontal, most penetrating shadow the geometry can produce.

I will be able to see the Ballincor turbines from my kitchen, my bathroom and my sitting room windows. All 11 of the proposed Ballincor turbines will be visible from my home. Together with the 8 Knockshegowna turbines already at the front of my property, and at least 3 of the 7 Carrig turbines that will be visible once that consented development is built, that is 22 wind turbines across three separate wind farms, visible from my home in a single field of view.

I look out across the bog at Knockshegowna hill and I can see Riverstown and Birr in the distance. The Ballincor cluster would occupy approximately 129 degrees of my visible horizon — more than a third of the full circle from a single point — at 185 metres tip height, on flat bog, in the foreground of every view that currently makes this place worth living in. The developer classifies this reality as negligible or not significant. It is not. In any ordinary understanding of landscape and residential amenity, this is visually dominant, visually overbearing and profoundly intrusive.

The character of the open landscape and the natural areas for wildlife that this place is — and that I moved here 21 years ago to live in, will be lost permanently if this development goes ahead. The otters, swans and cygnets on the river, the bats I see on summer evenings are protected under EU and Irish law. Otters are listed on Annex II of the Habitats Directive. Bats are protected under Annex IV. Swans are protected under the EU Birds Directive and the Wildlife Acts. The independent ornithological review of the developer's bird survey, lodged with the Community Submission, sets out in detail why the survey effort was structurally incapable of properly assessing the species at greatest risk — nocturnal species in particular, including the bats I see here and the barn owls that the developer's own scoping evidence places at the highest density in Ireland in this area. Eleven 180-metre turbines on flat bog represent a real collision risk for birds and for bats, and an ongoing displacement risk for species that need exactly the kind of quiet, intact midlands landscape this is. The wildlife on my property is part of why I am here. None of it has been adequately considered in this application.

Some years ago I had a bad accident involving a horse. The air ambulance was at my home within 15 minutes — it flew straight across the bog. That route is the route the proposed eleven 185-metre turbines would obstruct. Air ambulance operations have published separation requirements from wind turbines of this scale, and an approach path across bog with eleven structures rising more than 180 metres from it is not the unobstructed corridor the helicopter took to reach me that day. For a rural family with horses, with no realistic road-ambulance time advantage to compensate, the loss of that flight path is a concrete safety issue. It is the same air-ambulance route that has already, once, made the difference at my home.

On the financial position I will be brief. This house is the home I have built and invested in for 21 years. The peer-reviewed literature on wind turbine impacts on rural property values is consistent — measurable, statistically significant reductions, with the largest effects for the closest properties and

the tallest machines. We are within 754 metres of an 185-metre Nordex N163, with a confirmed shadow flicker exceedance, a 0.9-decibel noise margin, and the developer's own Profound-Substantial visual classification at our home. A house in that position will not sell for what an identical house in a comparable area without those features will sell for. The capital loss to me and my son is clear.

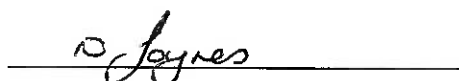
On the construction phase, the volume of concrete required for the turbine bases, the heavy haulage traffic on rural roads not built for it, and the cumulative disruption it brings, are real impacts that the application has not adequately engaged with at the level of the people who live here.

The Offaly County Development Plan designates the area within which this site sits as unsuitable for wind energy development. Since the Coolglass ruling, that designation carries real weight, and the reasons it was made — landscape sensitivity, ecological designation, the proximity of European sites, the rural residential pattern — apply to my home in full force. The application before the Board has not demonstrated any basis on which that policy should be set aside.

I clearly object to this application and ask An Coimisiún Pleanála to refuse it. Please, for the sake of our stunning countryside and boglands, and for the sake of the home and the land I have made a life in for 21 years, refuse planning permission for the proposed Ballincor Wind Farm.

Thank you for considering this submission.

Yours faithfully,

A handwritten signature in cursive script, appearing to read 'Nicky Joynes', is written over a horizontal line.

Nicky Joynes

Ballinamoe, Shinrone, Birr, Co. Offaly, R42 WP48

Receptor 109, Ballincor Wind Farm study area