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Paul Mann
 Farm Lodge,
 Sharavogue,
 Birr,
 Co. Offaly,
~~R224920~~
 R42PA97
 17/06/2026

Case Reference: PAX92.324279 – Ballincor Wind Farm, Counties Offaly and Tipperary
 Receptor number 160 (the family home I plan to refurbish and live in)

Dear Sir/Madam,

My name is Paul Mann. I live at Farm Lodge, Sharavogue, Birr, Co. Offaly. I work on the family farm, land which my family has worked for generations. I am writing as next generation owner of Receptor 160, the 200-year-old farmhouse on the family holding, built by my great-great-grandfather and lived in by every generation of the family since. It is the house I plan to refurbish, make my home, and raise my own family in. It overlooks the Little Brosna river and valley, with views stretching west for miles, and it enjoys unhindered evening sun. It will be my forever home, and the start of the next stage in the life of this 200 year old historic homestead.

This planning application makes that future almost impossible.

Three turbines within 1,000 metres of the home – one within 714 metres of the boundary wall

Three of the eleven proposed Ballincor turbines will be approx. 715m from my house, Receptor 160. Nine of the 11 turbines sit in a near-straight line to the west of the house, beside the Little Brosna river, directly between the windows and the evening sun, across the open callow and floodplain landscape that has defined the view from this house for the lifetime of my family. The image below is an attempt to demonstrate proximity and visual impact.



PICTURE FROM KITCHEN WINDOW



MORNING PHOTO



BEFORE WINDFARM



AFTER WINDFARM

This is not a marginal proximity. It places R160 inside the inner ring of every adverse impact this development will create - noise, shadow flicker, visual dominance, vibration during construction and the practical loss of any quiet outdoor amenity space at the property. The house I plan to live in carries one specific distinction in the developer's own assessment: it is the most severely affected shadow-flicker receptor of any of the 315 properties they modelled.

Shadow flicker at R160 — what the developer's own data shows, and what they chose not to put in front of the inspector

I have read Chapter 16 of the developer's planning application carefully, and I have read the appendix the chapter is supposed to be drawn from (Appendix 16-1). What is in the appendix and what is in the chapter are two very different things.

The developer's WindPRO software, produced by their own consultants, records the following for Receptor 160:

- Shadow flicker would occur on 212 days of the year. That is over seven months of the year, every year, for the 35-year operational life of this development.
- The worst-case annual total is 99 hours 59 minutes, almost 100 hours per year. The permitted limit under Department of Environment guidance is 30 hours. The figure for R160 is more than three times the limit.
- The worst-case daily maximum is 60 minutes — exactly double the 30-minute daily limit.
- These numbers have been compressed or reduced by the Applicant to somehow fall under Compliance thresholds but the manner in which they have done that should raise serious questions:
 - After the single sunshine-data correction that the independent technical review was able to fully verify (substituting Met Éireann's nearby Gurteen station data for the older, lower-sunshine Birr figures the developer actually used), the Expected annual figure for R160 rises to 20.2 hours, leaving less than 10 hours of headroom before the 30-hour limit is breached. That single correction consumes almost a third of the available margin in one step and several other modelling errors identified by the independent review (the deactivated terrain screening, the elevated-receptor geometry, the 3-degree solar cutoff) remain uncorrected, every one of them operating in the developer's favour.
 - The 212-day figure does not appear anywhere in Chapter 16. The chapter only reports 86 days at this property — the days on which the duration exceeds 30 minutes. The remaining 126 days, on which shadow flicker still occurs but lasts less than 30 minutes, were calculated by the

developer's own software and then left out of the chapter entirely. The total shadow-days figure is in column-form in Appendix 16-1 for every receptor. It was simply not reproduced in the chapter the planning inspector reads first.

A planning authority reading Chapter 16 in good faith would form a fundamentally misleading impression of what daily life at R160 will be like. The chapter shows 86 affected days. The truth, on the developer's own data, is 212. That is the difference between a sometimes-affected home and a home where shadow flicker is part of life on almost two thirds of the days of the year.

This is the home I plan to live in. The next 25 years of my life, the years when I would otherwise be refurbishing this house, raising children in it, and farming the land around it, will be spent inside a property the developer's own software identifies as the worst shadow-flicker case in their entire assessment. The shutdown system the developer relies on is calibrated to a 30-minute daily threshold; for 126 of the 212 affected days, shadow flicker at R160 falls below that threshold and the shutdown will not engage. Those 126 days are simply lived with.

A house I will not be able to mortgage

I am at the stage of life when a person normally borrows against a family property in order to refurbish it and make it their own home. I have looked into this seriously. Once a planning application of this scale is in the public domain, and once the developer's own modelling identifies a specific dwelling as the worst shadow-flicker receptor in a 315-property assessment, no Irish lender will treat that property the way they would treat an unaffected rural home.

There are two practical consequences. First, any valuer instructed by a bank to assess R160 is professionally required to flag the planning application as a material consideration, and to record the specific findings against the property. The valuation produced will be lower than it would otherwise have been — possibly substantially lower. Second, the loan-to-value ratio that an Irish bank will offer against a home with confirmed exposure of 99 hours 59 minutes of shadow flicker per year, on 212 days of the year, with three industrial turbines visible within 1,000 metres, will be poor, if indeed a loan is offered at all. I am being asked, in effect, to invest the cost of a refurbishment in a property that no lender will fund at ordinary terms, that no buyer will pay full market value for, and that no insurer will price as an ordinary rural home, all so that a multinational energy developer can extract revenue from this valley for 35 years.

This is not a hypothetical. The peer-reviewed research is consistent across multiple jurisdictions, Ireland, the UK, the Netherlands, Germany, the United States, Denmark and Canada, that wind turbines reduce the value of nearby homes. The strongest effects are within one kilometre and for rural detached properties. Exactly my situation. One major study found specifically that turbines over 150 metres in tip height produce larger property-value impacts than ordinary machines. The Ballincor turbines are 185 metres. The only Irish study that uses Irish Property Price Register data (Gillespie and McHale, 2023, University of Galway CERIS) found statistically

significant negative effects on Irish house prices near Irish wind turbines and is cited by An Bord Pleanála's own inspectors in their reports on comparable applications. It is not referenced anywhere in the developer's submission.

The property-value research also shows clearly that the harm begins at the planning application stage, not when the turbines are built. The moment this application became public, any solicitor, valuer or estate agent involved in a transaction at R160 is required to disclose it. I am experiencing planning blight on the home I plan to refurbish before a single sod has been turned, before any permission has been granted and there is no compensation mechanism for any of it under Irish planning law. Refusal of permission is the only available remedy.

The family farm — sterilised for the next generation

I am the next generation on this farm. My intention is to continue working it for the rest of my working life and to pass it on to the generation after me. The proposed siting of these turbines puts that whole intergenerational plan in question.

The geometry is unusually punishing. The current family home and R160, the house I plan to live in, both sit on the outer boundary of the holding. The entire farm lies between our houses and the proposed turbines. There is no part of this land that is not in the immediate visual, noise and operational envelope of multiple 185-metre turbines. Any future dwelling on this holding, for me, for my children, for the generation after them, would be no less compromised than R160. A young family member returning home in twenty years' time, wanting to build a house on their own family land, would be looking at the same turbines, the same shadow flicker, the same noise, the same problems with insurance, valuation and mortgage that I am facing today.

This is a material planning consideration the standard EIA process does not capture. The assessment treats each existing dwelling as a separate point in a table. It does not engage with what happens to the long-term residential potential of a family holding when three 185-metre turbines are sited within 1,000 metres of the house and across the holding's primary view. The development would impose a permanent intergenerational burden on this farm, removing or severely constraining the ability of future family members to live on their own land, for the operational life of the development and beyond. The site has been farmed by my family for hundreds of years. This application would end that as a generational possibility in one decision.

The callows, flooding and the access track

Part of the family holding consists of callow land on the opposite side of the Little Brosna river, directly across from where the developer proposes to lay access tracks. In places those tracks would sit within 20 metres of the river's edge. I have farmed and walked these callows since I was a child.

They flood every winter. Three feet of water across the callows, from November to March, reliably, every year. This is the lived experience of farming this land and it is borne out by the developer's own Flood Risk Assessment. The applicant's own data confirms that T1, T2, T8 and T9 sit in

Flood Zone A or B; that T9 is 50% inundated in a 1-in-100-year event and rises to 75% under climate-change scenarios; and that the site access tracks along the river corridor are fully submerged under the same scenario. The applicant's own NIS acknowledges hydrological connectivity between the site, the river, and the Sharavogue Bog SAC — whose boundary comes within 10 metres of the development and then denies it. The issue of drainage ditches and a shared groundwater body are never fully explored.

The idea that hundreds of metres of compacted hard-surface access track can be driven across an active floodplain, alongside excavation for turbine bases, and not affect flood behaviour on the opposite side of the river is not credible. I am not a hydrologist; I do not need to be. Water finds its own way. Compress one side of a floodplain and the water that used to spread there has to go somewhere and the somewhere is the other side, my side, where my grazing is. That will happen from the site entrance all the way along the callows to the SAC, with no doubt in my mind. The notion that the water in the development site will somehow have no connection or effect on the water table across the river is similarly nonsense.

The callow supports a significant portion of my summer grazing. If the grazing is degraded through extra flooding, contaminated runoff from concrete works, road residues, fuel, or sediment from disturbed peat, my livelihood is reduced. Animals may not be visibly sick; they may simply not do as well. There is no engagement with that possibility anywhere in the developer's documents.

Twenty years of agri-environmental work being undone in one decision

This farm has been in agri-environmental schemes for over twenty years. No fertiliser or slurry is spread near the river. Cattle are fenced away from the riverbank. The whole approach has been managed, year after year, under State-supported schemes specifically designed to protect water quality and biodiversity along exactly this stretch of the Little Brosna. The State has paid this farm for two decades to protect this corridor.

The Little Brosna is hydrologically connected to six European-protected sites — the Sharavogue Bog SAC, the River Shannon Callows SAC, the River Little Brosna Callows SPA, the Middle Shannon Callows SPA, Dovegrove Callows SPA, and Lough Derg SPA. The State has spent the last several years actively restoring Sharavogue Bog through over 400 rewetting dams. The bog is at its most sensitive moment of restoration. The river that runs past my land is the conduit between the proposed construction site and every one of those protected sites downstream.

The proposed development is directly and unambiguously contradictory to the agri-environmental work this farm has been doing under State direction for twenty years, and to the State's own active restoration of the bog 10 metres from the development. That contradiction has to be answered before any permission is granted.

The wildlife on the river and the callow

The callows and the river are home to barn owls, otters, swans, cranes, ducks and a wide range

of other wildlife. Walking by the river with the dogs is part of normal life here. The swans use this stretch of river regularly. They fly up and down it daily and can be seen landing in the callow from the family home. If these turbines are built I will be watching swans being struck by 185-metre rotating blades and dying in the callow. The barn owl population that uses this corridor is on the developer's own records. The cumulative impact on the wildlife of the river and the callows, considered honestly across construction and operation has not been adequately assessed.

The R492 and the proposed site entrance

The proposed site entrance is on the R492 and very close to the family farm entrance. Between the family home and the proposed development entrance there are two bridges, a humpback bridge over the old railway line and a bridge over the river, both with restricted visibility, a deep dip on the approach from one direction, and a continuous white line through the bend. The developer's planning drawings show a straight, flat, open road. The actual road is nothing of the kind.

There have been numerous accidents at the humpback bridge already, because of the combination of the bend and the rise. Sharavogue Bridge, built in 1850 and listed in the Offaly Record of Protected Structures for architectural and technical interest has no structural capacity assessment anywhere in the developer's submission despite being asked to carry two years of HGV traffic and oversized turbine component deliveries. That is a serious omission.

Separately, the water pipeline construction between Parteen and Dublin crosses the R492 just 300 metres from the proposed development entrance. The R492 will become a construction-traffic-only road for the duration. None of the landowners making land available for this development live on the R492. They will not have to use this road every day, and they will not have to live with the evening-sun flicker either. The people who will live with both are the people who already live here.

The site has been deemed unsuitable by Offaly County Council

This area is designated in the Offaly County Development Plan Wind Energy Strategy as unsuitable for wind turbine development on grounds of significant environmental, heritage and landscape constraints. Offaly has already provided substantial tracts of land for wind farms elsewhere in the county and has zoned other areas as suitable. There is no acceptable planning reason for this particular application on this particular site, in direct conflict with the County Council's own strategy.

My objection comes down to the following:

- Three 185-metre turbines within 1,000 metres of the family home I plan to refurbish, one within 714 metres of the boundary wall.
- Receptor 160 identified by the developer's own software as the worst-affected

shadow-flicker receptor in the entire 315-property assessment: 99 hours 59 minutes annual worst case, 60 minutes worst daily, 212 affected days a year with 126 of those days completely omitted from Chapter 16.

- A home that will be effectively un-mortgageable and significantly devalued from the planning stage onward, with no compensation under Irish law.
- A family farm sterilised for residential use by the next generation.
- Access tracks running along an active floodplain, 20 metres from the river edge in places, with the developer's own data confirming that the safety measures will fail in flood conditions and that those flood conditions coincide with the migration and spawning seasons for the protected fish species in the river.
- A direct and unanswered contradiction with twenty years of State-supported agri-environmental work on this corridor and the State's active restoration of Sharavogue Bog SAC 10 metres from the development.
- A dangerous proposed site entrance on a road that cannot carry the construction traffic, and no structural assessment of an 1850 protected bridge.
- A site Offaly County Council has formally designated as unsuitable for wind energy.

The developer has reviewed each of these issues in turn across their submission, written long technical reports on each one and concluded that every single one is "not significant." The Community submission has challenged every assertion, shown methodologies to be absent, flawed, inaccurate, inadequate or incomplete. There is a reason the methodologies and baseline data are absent, inaccurate, inadequate or flawed; to honestly and exhaustively assess the appropriateness of this site is to deem it unsuitable.

You, the Inspector who will ultimately determine the Environmental Impact Assessment of this development is asked to consider each on its own merits. I hope you set the highest standards and thresholds for the Applicant because the stakes are high for all concerned. There is no second site I can move my future to.

I respectfully ask An Coimisiún Pleanála to refuse this planning application.

I thank you for taking the time to read my objection.

Yours sincerely,

Paul Mann
Ali McCarthy