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R42YK44
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**Case Reference PAX92.324279 : Proposed Ballincor Wind Farm Development
and Associated Road and Infrastructure Works**

Grounds for my Objection to this proposed Development.

To the members of the Board,

I am a resident living on a farm just 4km from the proposed Ballincor windfarm. I live close to the granted Carrig wind farm so it is with real dismay that I now find a further wind farm proposed on the bogs beside me. I share the concerns of the community for this fragile landscape, for the rich diversity of habitats it holds and for the indigenous knowledge that is so evident among the people who live here. I want to object in the strongest possible way. This is not a suitable site for a wind farm. It will inevitably lead to the compromise and the destruction of habitats, and in many cases to the demise of some of our iconic red-listed birds and other species.

We are only one species. We have to consider the other species that share this terrain with us. We have a duty of care to them and they should also be protected by law. I am writing not as an ecologist or a consultant but as someone who has watched and listened to these birds for almost fifty years and who has already lived through this exact process once before.

My experience with the Carrig Windfarm process

I have been through this process before with the granted Carrig windfarm in 2025. In preparation for that proposal I recorded the birds on the nearby bogs — Clonfinnane, Sharragh and Fadden, meticulously, for three years. I conducted these recordings at various

times throughout the day and particularly at dawn and dusk. This was a labour of love. I was extremely dedicated to producing an accurate representation of the birds that were present.

I was shocked by what I read in the Developer's surveys. Species I knew to be there — that I had heard and recorded myself, in numbers — were undercounted, dismissed, and in some cases denied altogether. The surveys did not simply under-record them; they reported their absence. Birds I had listened to at dawn and dusk for years were written out of the record entirely as though the land were emptier than it is. My years of careful observation were set against a survey that had not looked at the right times or in the right places.

I presented my findings in my observation on the proposed Carrig Wind Farm, and it was my observation that was disregarded entirely. That is the heart of my objection to Ballincor, because I see the same pattern again. A survey is only as good as when and where the watcher is actually present. If you are not out at dawn and dusk you will not record the birds that move at dawn and dusk and then their absence from your tables is mistaken for their absence from the land. That is not a true picture. It is the shadow cast by a survey that looked away at the very moments that mattered.

The Curlew – Confirmed by Birdwatch Ireland 2025

My lived experience almost fifty years, tells me that there is breeding curlew on our local bogs. They are still there. I have recorded them at dawn and at dusk, often from half past four on a summer morning, and I have consistently heard the call of the curlew, and again in the evening, up to eleven o'clock at night. I have heard curlew alarm calls, which indicate breeding birds. These are not casual observations. They are the patient record of a person who knows this ground.

In 2025, BirdWatch Ireland surveyed in this area [*BirdWatch Ireland breeding bird survey, Ballyduff/Clonfinnane SAC, May–June 2025*]. I have read their report. It is plain that my findings were almost identical to theirs. The breeding curlew I have heard for half a century were confirmed by the professionals when they finally came and listened at the right time of day. The difference between us was not accuracy. It was that nobody asked me, and nobody credited what I knew.

It is very hard to have faith in a system that does not take into account, and does not respect the lived experience of the people who live here so I make this submission again, for Ballincor, in the hope that this time someone in authority will listen before the permission is granted rather than after.

The bird surveys for Ballincor are not adequate

When I read how the bird surveys for this application were carried out, I recognised the same pattern that troubled me about Carrig. The survey effort may look substantial on paper, many hours, many seasons, but when you look at when the watchers were actually out, the picture falls apart. They were out in the middle of the day. They were not out at the times the birds are actually moving.

Most of the survey work — eight of the nine seasons — was carried out by one company (Ecology Ireland) between 2020 and 2024, with the watching concentrated in the middle of the day. Only a single, final season, in the winter of 2025/26, was carried out by a different company (TOBIN) to a proper modern standard. One good season cannot make up for eight poor ones. And the developer's own figures show just how poor the earlier seasons were.

The Dawn and Dusk Gap

The idea that surveys are not carried out at dawn and dusk is the issue that matters most to me because dawn and dusk are precisely when I do my own listening and precisely when the curlew, the swans and the wildfowl are on the move. An analysis of the Ecology Ireland and Tobin survey effort and corresponding bird data shows the following:

Time of day	Ecology Ireland (8 seasons)	TOBIN (1 season)
At sunset, winter	16 minutes in total across 4 winters	869 minutes in one winter
After dusk, winter	0 minutes across 4 winters	538 minutes in one winter
At sunrise/dusk, summer	0 minutes across 4 summers	no summer survey done

Look at the difference. At sunset in winter, the single most important moment of the day for wildfowl flying out to roost, the main survey recorded sixteen minutes in total across four entire winters. The one proper season recorded eight hundred and sixty-nine minutes at the same time of day in a single winter. After dusk, the main survey recorded nothing at all, across four

winters. In the summer breeding season, when the curlew are calling and displaying, there were zero minutes of survey at dawn and dusk across four summers and one whole summer, 2022, is simply missing from the record with no explanation given.

The developer's own modeller admits, in writing, that there was not enough survey effort to even calculate what the birds were doing in the evenings in the main dataset. That is an admission that the very part of the day when collision and disturbance risk is highest was never properly watched. Everything I have personally recorded at half four in the morning and at eleven at night, they did not record at all for eight seasons out of nine.

The Wrong places and no night-time surveys at all

It is not only the times of day I have issue with. The surveyors were watching from the wrong places. One of the proposed turbines (T5) sits outside the view of every single survey point, at every height, in every season. There is no actual recorded flight data for that turbine location anywhere in nine seasons. A good deal of survey time was also spent watching areas outside the zone that actually matters around the turbines. No night-time listening, no acoustic recorders and no radar were used at any point even though the area is mapped by BirdWatch Ireland as having the HIGHEST sensitivity to wind energy development so extra attention and care should be mandatory.

The Species that were brushed aside

What upsets me most is the same thing that upset me about Carrig: the disregard for individual species that I know to be here. When a survey misses dawn and dusk, it does not miss birds evenly, it misses exactly the birds that move at dawn and dusk. And then those birds are written down as 'rarely recorded' or 'limited site use', as though their scarcity in the data were a fact about the birds rather than a fact about the survey.

Curlew

There are only around 105 breeding pairs of curlew left in the whole country. The loss of a single pair is close to one per cent of the entire national population. I have heard breeding curlew on my bog for almost fifty years, and BirdWatch Ireland confirmed them present in the breeding season in 2025 on the adjoining Ballyduff/Clonfinnane bog. Yet in this application the curlew is lumped in for assessment alongside common birds like coot and gulls, with no

individual collision assessment, no targeted breeding survey, and no breeding disturbance analysis. A bird that rare, that I can personally vouch for, deserves to be assessed on its own, not folded into a list and dismissed.

Merlin

Merlin is a protected Annex I bird. BirdWatch Ireland confirmed a breeding pair, and located the nest, on the Ballyduff/Clonfinnane bog in May and June 2025 — only 2.8km from the proposed turbines, well within the distance a merlin will travel to hunt. The application dismissed the idea that this bird has any connection to the site yet the nest was located, in the breeding season, within hunting range. The dismissal is contradicted by the evidence.

Whooper Swan

There is a long-established whooper swan roost at Sharragh, on NPWS land, with a flight line that runs through this development zone toward the Little Brosna. We know this flight line is real and dangerous because the ESB had to fit collision deflectors to the powerlines in that very area after repeated swan strikes. The swans commute along it before dawn and after dusk, exactly the times the surveys did not cover. The developer's own modeller admits the collision risk to whooper swan may have been under-estimated for this reason, and then concludes the impact is 'negligible' anyway. You cannot admit you have under-counted and **then declare the count harmless in the same breath.**

Golden Plover and the others

A flock of around 3,500 golden plover was recorded within 500m of the site boundary — these are birds of the internationally important Little Brosna SPA. Their dawn and dusk movements, when they flock and are most at risk, were not recorded. And these are protected, qualifying-interest birds. The same story repeats for the Greenland white-fronted goose, the lapwing, the snipe and the rest of the long list of red- and amber-listed birds I have set out at the end of this submission.

The wider picture — one ecosystem, carved up between applications

All of these bogs, Sharavogue, Ballyduff/Clonfinnane, Clonfinnane, Sharragh, Fadden, are in close proximity and many of them are designated as Special Areas of Conservation. It beggars belief that the destruction of these areas is allowed to continue in a way that the people who

live here are not comfortable with. Some of us try to make our voice heard. Others do not, for fear of falling out with neighbours or because they do not feel they have a voice, or because they feel it is a fait accompli before they even start.

This is one connected ecosystem and it is being assessed one application at a time. Carrig, Cush, Derrinlough, Ballincor. Each developer assesses only their own project, concludes it does no harm on its own, and treats every other project as harmless background. Nobody adds it all up. It is the logic of saying that because no single raindrop is responsible for the flood, there can be no flood. The NPWS itself said in 2024 that the combined effects across this area have not been assessed. That is still true of this application.

What I am asking the Board to do

I believe it is sometimes important to challenge our neighbours. We all share the same universe and when we harm our environment we ultimately harm our own health and our own future. No community wants this battle inflicted on them. People just want to get on with their lives. But sometimes we have to take on a battle we did not choose, because if we do not, we may lose the habitats that have sustained nature over generations. People do not object for the sake of objecting. It is a long and arduous journey.

I understand that we also have a climate crisis. I do not dismiss it. But we cannot solve one crisis at the expense of the other and we cannot keep plundering our biodiversity in the most brutal manner while telling ourselves we are protecting it. The County Development Plan exists for a reason and if it were adhered to, it would help preserve these ecosystems. There should be dedicated rangers patrolling our sensitive areas, so that accurate knowledge is gathered in advance and better-informed decisions can be made.

I ask the Board to refuse this application and at the very least to find that the bird surveys are not adequate to support it. The onus should not be on the community to prove that protected species are protected. A bare assertion that adequate survey was done is not the same as evidence that it was. On the developer's own figures, this survey missed the times of day and the places where these birds actually are.

When will someone in authority shout stop? This cannot continue. We need a more transparent system and an honest conversation about where this is going and how we can preserve what is left for future generations.

Don't take me for granted. I know more than I let on, see more than you realise, and care more than you can imagine.

— Charles F. Glassman

I offer that quotation on behalf of the birds. I have spent fifty years listening to them. I am asking you to listen too.

Yours faithfully,

Sheila Hooton

Appendix — The birds I have recorded in this landscape

These are the species I have recorded in my own watching of this landscape over the years, grouped by their conservation status on the Birds of Conservation Concern in Ireland list.

Red-listed birds are of the highest concern; amber-listed birds are of medium concern. Many of these are the very species the survey effort was least able to detect.

Red List (highest concern)	Amber List
Woodcock	Whooper Swan
Barn Owl	Greenland White-fronted Goose
Kestrel	Merlin
Curlew	Skylark
Lapwing	Bittern
Golden Plover	Short-eared Owl
Snipe	Kingfisher
Redshank	Common Sandpiper
Dunlin	Sand Martin
Oystercatcher	Swallow
Redwing	House Martin
Meadow Pipit	Swift
Yellowhammer	Starling
Grey Wagtail	Willow Warbler
Whinchat	Spotted Flycatcher
Wood Warbler	Wheatear
Ring Ouzel	Goldcrest
Marsh Harrier	Linnet
Common Redstart	Greenfinch
	Tree Pipit
	Wigeon
	Teal

Red List (highest concern)**Amber List**

Mallard

Gadwall

Coot

Mute Swan

Greylag Goose

Ringed Plover

Little Ringed Plover

Great Northern Diver

Great Crested Grebe

Black-headed Gull

Arctic Tern

House Sparrow

Pied Flycatcher

Western Yellow Wagtail

Brambling