

Arthur O' Grady,  
Eoghan O'Grady,  
Ballycushen,  
Ballyclough,  
Mallow,  
Co. Cork.  
14<sup>th</sup> June 2025.

The Secretary,  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1.

<b>AN BORD PLEANÁLA</b>	
LDG- _____	070839-25
ABP- _____	
17 JUN 2025	
Fee: € 220	Type: Chg
Time: 9-26	By: Reg Rest

Re; Planning Application Reference No. Cork County Council 24/05503

Dear Sir/Madam,

We wish to object to the planning permission granted to Tullacondra Green Energy Ltd. on 22.05.25 by Cork County Council, on the grounds outlined in our objections submitted to Cork County Council.

Enclosed are our letters of acknowledgement and a cheque for the fee.

We wish to make a specific observation on the Equine Welfare Assessment Report Appendix 22.1

Equine Veterinary Consultants were invited by Tullacondra Green Energy Limited and a report commissioned to 'review and respond to Equine Observations (EO) received'. Tullacondra Green Energy Limited (The Applicant) engaged Mr. Michael Sadlier.

Under the heading 'Relevant Experience', it is not obvious if Mr. Sadlier has similar consultative experience of Wind Farm developments and their effect on bloodstock.

## **Re: Assessment Approach and Methodology**

*Mr. Sadlier references Planning Precedent (Page 6)*

In our opinion, a precedence was set by An Bord Pleanála and Tipperary County Council: Application no. 07111 Green Organics Energy Limited

In this case, planning permission was refused on the grounds that the proposed non-agricultural development would impact negatively on the viability of existing stud farms and stables.

The planning inspectors report for An Bord Pleanála noted that it should be a consideration in the planning process, 'if one successful enterprise of benefit to an areas economy is placed at risk by a development which is not by its nature locationally tied to the area'.

The proposed wind farm development clearly falls into the category of being

- (a) A non-agricultural development
- (b) It is not specifically locationally tied to this area
- (c) Would clearly have a negative/detrimental impact on the viability of local equine businesses and local services and suppliers.

However, it is our believe that planning should be refused on several health and safety grounds to both horses, and people working with horses.

As an employer we have a statutory obligation to carry out a risk assessment and prepare a safety statement.

Injury to persons who work with horses is a significant occupational hazard which would be greatly increased by noise, blade movement, turbulence and flicker generated by wind turbines, as is the risk of injury to horses.

This is supported by reports and academic sources;

- Dr. D P Leadon, Clinical Consultant, The Irish Equine Centre.
- Dr. Carol Nolan, Veterinary Inspector Cork County Council
- Ryan McElligott, CEO Irish Racehorse Trainers Association
- Colin Kehoe, HRI Health and Safety Business Partner
- British Horse Society.

## **Re: Reports from Professional and Academic Sources**

***Report 1: Dr. Des Leadon, 11<sup>th</sup> September 2024***

***Report 2: 13<sup>th</sup> June 2025***

### Expert Opinion re Letter of Instruction Ref 23408-24/JN/PW

This expert opinion is based on my qualifications, my experience of the national and international Thoroughbred industry (as attached in my outline CV) and on my professional roles as an expert witness in Court (including the High Courts of Ireland and the UK and in the Supreme Court in Australia) and in particular as an expert witness in many planning objections and appeals in Ireland, in Co Tipperary, in Co Meath and in Co Kildare.

The potential aversive effects of noises emanating from windfarms have been the subject of legal cases throughout the Western world where proprietors of horse facilities adjacent to wind farms attest that the sound (as well as the flicker of moving turbine blades) is aversive to horses and has safety ramifications for horse riders and handlers. In this context it is important to recognise that the scientific literature shows that the sensory abilities of horses differ from those of humans in a number of aspects in that horses can see almost a full circle around themselves, see better in low light than humans and can hear sound frequencies that humans cannot<sup>1</sup>. It is therefore inappropriate to attempt to simply extrapolate between human perceptions and those of horses. Noise and extraneous movement thresholds for horses are significantly lower than those for humans.

“Noise aversion” or “noise anxiety” are terms used when an animal over-reacts to noise and unpredictable noise cause the greatest fear reactions. These noises can have long lasting effects and have been reported to adversely affect for food intake, growth and production rates<sup>2,3</sup>. Severe noise anxiety is reported to cause serious welfare consequences, impacting both physiology (e.g., gastrointestinal signs, sweating) and behaviour (e.g., running, collisions with and breaking fences) of the horse<sup>4</sup>. Very anxious horses showed signs of noise reactivity frequently and their reaction did not improve with time (they do not habituate to these stimuli).

Because they are a prey species, sensory systems of horses evolved to enable a prompt detection of potential danger, throughout a combination of visual, auditory and olfactory cues<sup>5 6</sup> and unexpected and hitherto unknown noises elicit rapid flight reactions more frequently<sup>7</sup>. Horses are most easily

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<sup>1</sup> Sensory abilities of horses. Rorvanq et al. *Front Vet Sci.* 2020; 7: 633.

<sup>2</sup> Tracey J.P., Fleming P.J.S. Behavioural responses of feral goats (*Capra hircus*) to helicopters. *Appl. Anim. Behav. Sci.* 2007;108:114–128

<sup>3</sup> Head H.H., Kull R.C., Campos M.S., Bachman K.C., Wilcox C.J., Cline L.L., Hayen M.J. Milk Yield, Milk Composition, and Behavior of Holstein Cows in Response to Jet Aircraft Noise Before Milking. *J. Dairy Sci.* 1993;76:1558–1567

<sup>4</sup> Maria Giorgia Riva, Francesca Dai, Mirja Huhtinen, Michela Minero, Sara Barbieri, and Emanuela Dalla Costa. The Impact of Noise Anxiety on Behavior and Welfare of Horses from UK and US Owner’s Perspective. *Animals* 12(10), 1319, May 2022

<sup>5</sup> Christensen J.W., Keeling L.J., Nielsen B.L. Responses of horses to novel visual, olfactory and auditory stimuli. *Appl. Anim. Behav. Sci.* 2005;93:53–65

<sup>6</sup> Saslow C.A. Understanding the perceptual world of horses. *Appl. Anim. Behav. Sci.* 2002;78:209–224

scared by noise that arises outside their field of binocular vision<sup>8</sup>. Light flashes and unknown odours have also been reported to be potent inducers of fear reactions. It is noteworthy that compared to visual and olfactory stimuli, unexpected unknown noises (and movements) seem to elicit rapid flight reactions more frequently

There is a high rate of incidence of injury (26%) among horse rated as either anxious or very anxious in the face of noise and / or light related flashes and simply moving horses to adjacent paddocks was found to be ineffective in 37% of cases. Noise has also been shown to elicit restlessness, vocalisation and colic / gastro-intestinal disturbances<sup>9 10</sup>.

Many management strategies used in efforts to control the effects of noise have been shown to be ineffective. Placing horses in stables to try to prevent adverse effects is also unsatisfactory as those in single stables exhibit even stronger reactions to unknown stimuli, with an increased risk of accidents and adverse effects on welfare, which can include long term behavioural abnormalities<sup>11</sup> Sedation can often give disappointing results and cause undesirable side effects and long term sedation is impractical and inhumane.

Injury to those persons who work with horses is a significant occupational hazard and can extend to thousands of accidents with associated fatalities<sup>12 13</sup>.

Very many high value Thoroughbred horses are insured through Underwriter syndicate members of the Lloyds Livestock Committee in London. Many of these horses, singly or collectively, are insured for substantial seven figure sums. The Lloyds Livestock Committee have advised through personal communication that the normal terms and conditions of their all-risks mortality policy are null and void if horses are knowingly maintained or placed in situations of risk. They have advised that policies for horses on studfarms immediately adjacent to industrial scale solar plants may be subject to significant additional charges and exclusions or may be forfeit altogether.

It is therefore entirely reasonable to state as in the Letter of Instruction Ref 23408-24/JN/PW that major wind farm proposals and adjacent viable thoroughbred breeding enterprises are incompatible land uses. I am in full agreement with the need identified in same, for a carefully evaluated buffer between these entities.

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<sup>8</sup> Algiers B. A note on behavioural responses of farm animals to ultrasound. *Appl. Anim. Behav. Sci.* 1984

<sup>9</sup> Gronqvist G., Rogers C., Gee E. The management of horses during fireworks in New Zealand. *Animals*. 2016;6:20

<sup>10</sup> Dai F., Rausk J., Aspegren J., Huhtinen M., Cannas S., Minero M. Use of Detomidine Oromucosal Gel for Alleviation of Acute Anxiety and Fear in Horses: A Pilot Study. *Front. Vet. Sci.* 2020;7:573309

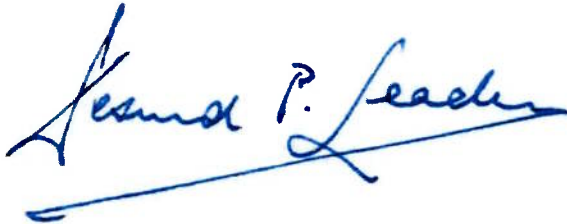
<sup>11</sup> Lesimple C., Fureix C., LeScolan N., Richard-Yris M.A., Hausberger M. Housing conditions and breed are associated with emotionality and cognitive abilities in riding school horses. *Appl. Anim. Behav. Sci.* 2011

<sup>12</sup> Holler A.C. *Am Ind Hyg Assoc J* 1984 Jan;45(1):34-8.

<sup>13</sup> Gimsing S. Hesterelaterede arbejds-skader 1992-1999 [Horse-related occupational injuries 1992-1999]. *Ugeskr Laeger*. 2001 Oct 22;163(43):5982-5.

In this context I would cite the following from Whisperview Trading and Carriganog Racing, Carriganog, Owing Hill, Piltown, County Kilkenny, in response to Kilkenny County Council's notice pursuant to Section 12(1)(b) of the Planning and Development Acts 2000 (as amended), inviting submissions to the Draft Kilkenny City and County Development Plan 2021-2027 (the Draft Plan). "*Given the importance of the bloodstock industry nationally, regionally, and locally, and the sensitivity of equine facilities to environmental change and impacts, a specific policy should be included in the Renewable Energy Strategy that requires any renewable energy proposal within the County to include a detailed assessment of potential impacts on equine facilities within a 5km radius. Any proposed development that has the potential to adversely impact the industry or the perception of the industry, will not be permitted.*" (My underlining). This is an eminently reasonable reconciliation of the needs for preservation of one of Ireland's premier industries and national assets, and the needs for the creation of renewable energy.

Signed and dated Monday 9<sup>th</sup> September 2024

A handwritten signature in blue ink that reads "Leonard P. Leadon". The signature is written in a cursive style with a long horizontal stroke at the end.

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Dr D.P. Leadon

MA MVB MSc FRCVS DipECEIM, European College and RCVS registered Consultant in Equine medicine

## Abridged Curriculum Vitae

Dr Desmond Leadon MA, MVB, MSc, FRCVS, DipECEIM, European College & RCVS registered Consultant / Specialist in Equine Medicine

### Qualifications

- Fellow of the Royal College of Veterinary Surgeons with more than 40 years of clinical veterinary experience. Diplomate of the European College of Equine Internal Medicine.
- Registered Consultant in Equine Medicine from both the RCVS and the European College of Equine Internal Medicine.

### Positions Held

- Head of Equine Clinical Pathology at the Irish Equine Centre for 30 years. Current position there is that of Clinical Consultant.
- President British Equine Veterinary Association (1993-1994)
- President World Equine Veterinary Association (2001-2006)
- Founding Diplomate and former Vice-President of the European College of Equine Internal Medicine (2002 to 2008).
- International Director of the American Association of Equine Practitioners (2009 to 2012)
- Past Presidents Advisory Committee of the World Equine Veterinary Association (2006 to date).
- Chairman – Veterinary Advisory Committee - European Federation of Thoroughbred Breeders Associations.
- Chairman – Veterinary Advisory Committee - International Thoroughbred Breeders Federation

### Presentations and Publications

- More than 200 presentations to national and international meetings and 80 contributions to the scientific literature.

### Expert Advice

- Member of the International Movement of Horses Committee of the International Federation of Horseracing Authorities.
- Pre-movement inspector for the International Racing Bureau, the Hong Kong Jockey Club and the Saudi Cup.
- Commissioned to travel with horses to the 2020 Tokyo Olympics.
- Expert Advisor to the FVO of the EU on the transport of Horses.
- Member of the EFTBA delegation to EU Commissioner Phil Hogan and his officials at the EU Commission on the movement of horses
- Pre-Auditor (with Professor W Bayly) for South Africa's bid for the resumption of direct horse exports to the EU (2019).
- Expert Veterinary Advisor to the Lloyds Livestock Committee.
- Member of International Horse Sport Council Task Force on the Transport of Horses post Brexit and on the 2021 EU Animal Health Laws (2020 to present).

### Awards

- Presented with the « Outstanding Contribution to the Thoroughbred Industry Award » by the Irish Thoroughbred Breeders Association (2014)

## Supplement to Expert Opinion Report

re Letter of Instruction 23408-24/JN/PW dated 11<sup>th</sup> September 2024

Date 13<sup>th</sup> June 2025

This supplementary report has been prepared at the request of Noonan Linehan Carroll Coffey LLP and is based on the Decision issued by Cork County Council on 22<sup>nd</sup> May 2025, the letter issued by Carol Nolan, Veterinary Inspector, for appeal to An Bord Pleanala.

### **Planners report and conclusions**

#### **1. Equine Welfare Assessment**

The Planners report refers to a report commissioned by the developers. Its title is Equine Welfare Assessment. Its author lists 19 previous reports all of which were produced for developers and none of which were commissioned by members of the equine industry. This report consistently refers to the absence of refereed journal publications on the adverse impacts of wind turbines on equine welfare. It makes no reference to the need for application of the "Precautionary Principle" where this type of information does not exist viz; "In essence, it means that if a potential risk exists, action should be taken to prevent or mitigate it, even if the full extent of the risk is not yet known." The report also fails to acknowledge the fact that any study that sought to impose and measure adverse effects on animals would never be licensed and would contravene every animal welfare guideline consideration and legislation. The only certain means of ensuring that there are no adverse animal welfare impacts from these developments is not to place them in the immediate locale of the NSR's (Noise Sensitive Receptors) that are represented by Thoroughbred racehorses and breeding stock – as cited in the final para of my report of 11<sup>th</sup> September 2024, with reference the Whisperview Trading and Carriganog Racing to response to the Draft Kilkenny City and County Development Plan. This report is also factually incorrect. It states that "there is no evidence of a gallop or fences in the paddocks closest to the wind turbines". In reality Plot 5 is within some 75 metres from Turbine no 3. Furthermore all areas of Ballycushen are used in conjunction with the training of racehorses and the associated breeding enterprise. This report is highly selective in its references to published material and for example refers to a conference proceedings presentation on noise levels at the Melbourne Cup – which is in no way analogous to the proposed development and whose authors never intended it to be used for this purpose. It also repeatedly refers to a British Horse Society document, without acknowledging the importance of its statement that 20% of riders had experienced an adverse reaction to wind turbines. This is not compatible with the conclusion that "no medium to long term impacts are anticipated from the proposed development". Adverse reactions to wind turbines are an ever present and enduring hazard to horses, particularly for volatile Thoroughbreds and those who ride and work with them.

#### **2. Planners report – further information assessment**

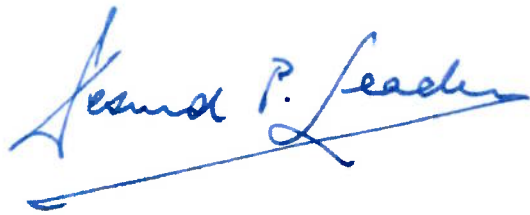
The Planners report itself cites the 2006 Wind Farm Guidelines as making "no reference to livestock equine establishments, or bloodstock activity and that the current iteration makes no reference to same". Furthermore it states that there is an absence in the absence of national, regional or local

policy in the present context. Irelands bloodstock industry is a national asset and the deliberate absence of policy as a means to facilitate these developments, while placing these assets at risk, is wrong and very damaging to the industry as a whole and to its individual stakeholders.

3. Carol Nolan, Veterinary Inspector, Cork County Council.

I note the email issued by Carol Nolan, Veterinary Inspector, Cork County Council and her conclusion that there are significant implications for personnel and equines arising from this development and I am in full agreement with her.

Signed;

A handwritten signature in blue ink that reads "Seamus P. Leach". The signature is written in a cursive style and is underlined with a single horizontal line.

**Report 3: Dr. Carol Nolan, Veterinary Department Cork County Council, 30/09/2024**

*I refer to planning application ref number 24/5503.*

*The proposed wind turbine development presents an adverse risk to equine holdings in the locality and in particular to an established thorough-bred enterprise within an adjoining land holding.*

*Thorough-breds are recognised as highly strung. They spook more easily due to their highly evolved sensitivity to their environment. According to the British Horse Society horses are spooked by the noise, blade movement and shadow flicker created by wind turbines.*

*The three elements of wind turbines with potential to result in significant risk to the safety of horses and personnel include;*

- Blade movement and particularly when a blade comes into sudden view;*
- The effect of shadow flicker which is particularly pertinent in the case of thoroughbred horses;*
- Noise effect of large turbines, particularly at start -up. The Noise effect is accentuated by virtue of the scale of the development.*

*The proposed development is directly adjacent to a thorough-bred racing enterprise and does not meet the British Horse Society recommendation of a minimum separation distance of three times blade tip height from a business with horses, (525M) in this instance.*

*There are significant potential safety implications for personnel and equines within the impact area of shadow flicker.*

***I recommend refusal. Carol Nolan 30/09/2024***

**Report 4: Dr. Carol Nolan, Veterinary Department Cork County Council, 20/05/2025**

*To the above referenced planning application (24 5503) and a veterinary public health assessment of same, I refer.*

*The proposed wind turbine development presents a significant adverse risk to activities on an equine racing enterprise located on directly adjacent lands.*

*In particular - concern arises due to the fact that it is a bloodstock enterprise. Thorough-Breds have a highly evolved sensitivity to their environment and in my opinion there is a significant risk to health and safety from the proposed development.*

*In the absence of published guidance by Irish Equine Bodies, guidance from the British Horse Society is noted here. A minimum separation distance of three times blade tip height from a business with horses, (525M) is recommended by the British Horse Society. This development is large in scale with 9 turbines proposed. The proposed development is directly adjacent to the racing enterprise, the siting of which does not meet the minimum distance as recommended.*

*The three elements of wind turbines with potential to result in significant adverse risk to the safety of personnel and horses include;*

- *Blade movement and particularly when a blade comes into sudden view;*
- *The effect of shadow flicker which is particularly pertinent in the case of thorough-bred horses;*
- *Noise effect of large turbines, particularly at start -up. The Noise effect is accentuated by virtue of the scale of the development. There are significant safety implications for personnel and equines within the impact area of shadow*

*There are significant safety implications for personnel and equines within the impact area of shadow flicker from the development.*

**I recommend refusal.**

*Carol Nolan Veterinary Inspector*

## **Correspondences**

### **1: Irish Racehorse Trainers Association**

Our Ref: AOG/RMC

29th August 2024

Dear Sir/Madam,

I write to you on behalf of Arthur O'Grady who is a member of the Irish Racehorse Trainers Association (IRTA). In recent weeks Mr O'Grady contacted me as the head of his representative body to outline his concerns about the development of a wind farm adjacent to his premises.

As Mr O'Grady has outlined to you a wind farm represents a hazard for his business as there will exist a significant health and safety hazard to both horse and rider. Mr O'Grady notes that the British Horse Society has found that horses are spooked by the noise, blade movement and shadow flicker created by wind turbines.

The potential health and safety hazards presented by this proposed development could have a very grave impact on Mr O'Grady's training business to the point where closure and the winding up of the business is a very real and live possibility.

Any development that could impact on one of the IRTA's members to this extent is one of grave concern to this organisation whose members play such a vital role in rural communities throughout the country. I would ask you to take on board these pressing concerns as the closure of such a business which plays its part in maintaining a vibrant rural community would be regrettable in the extreme.

Yours Sincerely,

Ryan McElligott

CEO Irish Racehorse Trainers Association

## 2: Horse Racing Ireland, Date:05/06/2025



**a:** Ballymany, Co. Kildare, R56 XE37  
**t:** + 353 (0) 45 455 455  
**m:** 086 4425226  
**w:** [www.hri.ie](http://www.hri.ie)

Dear Sir/Madam,

I write to you in support of the O'Grady Family who's farm and equine business will be adversely affected should the proposed wind farm be granted planning permission Reference No. in Planning Register 24/05503.

I have visited the O' Grady farm at Ballycushen and noted that one grass gallop would be less than 5 metres in distance from the tip of T3 wind turbine when it's facing in a particular direction and the blade in a horizontal position, and another grass gallop within 25 metres of T4, similarly when the wind turbine is facing in a particular direction and the blade in a horizontal position.

Several grass paddocks would be in very close proximity to wind turbines. Approximately 60 acres of Ballycushen farm is within 525 metres of a wind turbine. I would have grave concerns for employees and family members working with highly strung thoroughbred horses due to adverse safety risks arising from

- Blade movement particularly when a blade comes into sudden view
- The effect of shadow flicker
- Noise effect of large turbines. The noise effect is accentuated by virtue of the scale of the development.

I have noted that 6 of the 9 proposed wind turbines would be in breach of BHS Guideline as they would be within 525 metres of the equine business.

There are three small children aged 3, 8, and 14 that live on the farm. All three have ponies and are involve in the local Duhallow pony club. It would be particularly dangerous for these children exercising and handling their ponies. I would be certain the O Grady farm would find it extremely difficult to obtain insurance for it employees due the increased safety risks that could be in place should this development go ahead.

Yours Sincerely,



**Colin Kehoe**

HRI | Health & Safety Business Partner

Every Racing Moment.



## **British Horse Society (BHS) Guidelines**

The BHS policy recommends a minimum separation distance of 200m or three times blade tip height (whichever is greater), between a turbine and any route used with horses or a business with horses (Page 9 of Appendix 22.1).

Key advice for Planning officers and Developers is as follows:

*“The BHS strongly recommends that the views and concerns of local equestrians should be recognised and considered when determining separation distances and that normally a minimum separation distance of 200m or three times blade tip height (whichever is greater) will be required between a turbine and any route used with horses or a business with horses.*

*This minimum separation distance may not be appropriate in all situations. Every site should be considered independently because there are likely to be many interdependent factors involved.”*

*‘One turbine is much easier to cope with than many: the more turbines, the greater the threat’ (Page 13-14 of Appendix 22.1).*

Carol Nolan, Veterinary Inspector Cork County Council, notes in her recommended refusal that the noise effect is accentuated by the virtue of the scale of the proposed development ( Planning No: 24 5503).

The BHS policy statement on the advice on wind turbines and horses for riders, includes additional points for consideration.

- “Undulating ground which alters the height at which moving blades are in view is different from flat ground where all movement is well above eye level from any approach.
- Encountering a moving turbine at close quarters because it was obscured on approach by a hill, wood or building is a greater risk than approaching a turbine clearly in view from several hundred metres” (Page 15 of Appendix 22.1).

### **Business with Horses (Page 17 of Appendix 22.1)**

Mr. Sadlier, the author of the report referenced here, fails to recognise the business of EO1 and EO2 is the entire farm, which includes grass gallops, schooling grounds, paddocks etc.

The training, breeding, rearing, sales preparation, breaking of horses, pony riding etc. is only 76 metres from T3; 103 metres from T4; 305 metres from T7; and less than 500 metres from three others.

Carol Nolan, Veterinary Inspector Cork County Council, further notes in her recommended refusal that a minimum separation distance of three times blade tip height from a business with horses, (525M) is recommended by the British Horse Society. Therefore, she concludes that the proposed ( Planning no: 24 5503), does not meet the minimum distance as recommended by the BHS.

Furthermore, sixty acres of the business which is adjacent to the boundary of the proposed wind farm, owned by the EO1 and EO2, would be inside the minimum recommendation of BHS of 525 metres. This would have profound implications for the operation and the viability of their businesses. See Dr. Desmond Leadon's Report.

## **Methodology used in compiling Mr. Sadlier's Report (Appendix 22.1)**

After a thorough review, we have identified several key issues with the report's methodology.

For example, on page 29, Mr Sadlier states he visited the site of the proposed wind farm development in the company of two members of the Tullacondra Green Energy team on the 23<sup>rd</sup> October 2024.

No visit or contact with EO1 or EO2 was made, although observations were documented about their activities and business.

Mr. Sadlier mentions a visit to a Point-to-Point fixture in October 2024 where he got the opinion of a parking attendant and two spectators (page30).

Mr. Sadlier describes a visit to a showjumping yard with four 99m tip height turbines on the same part of the farm (page 31).

However, this is hardly comparable to a thoroughbred horse racing yard and ancillary businesses adjacent to a nine-turbine wind farm, with a tip height of 175 meters.

### **Impact on groundwater (page 37)**

Mr. Sadlier has not fully addressed concerns posed by EO1, EO2, EO5 and EO6. However, in our opinion, there are major omissions on the applicants' survey of karst features. There are numerous 'sluggera' and swallow holes in the area. Aquifer vulnerability in the GSI maps range from extreme to moderate.

We have grave concerns that our water supply from a deep well will be negatively impacted in both volume and purity.

## Habituation

This concept is only partially successful, even with non-thoroughbreds. Recent reports have shown Cavalry horses bolting through London streets in April 2024 and July 2024. These incidents have caused injury to both individuals and horses, and involved horses being spooked by loud noise or other distractions (The Guardian, 2024).



## Activities associated with falls (page 54)

Mr. Sadler uses figures on hacking/trail riding, schooling on the flat and showjumping. This is not comparable to galloping breaking or schooling racehorses over fences.

### **Insurance for Equine Mortality and Employee Indemnity (page 57)**

Dr. Leadon in his report states that Lloyds Livestock Committee have advised that the normal terms and conditions of their all-risk mortality policy are null and void if horses are knowingly maintained or placed in situations of risk.

He quotes "that it is entirely reasonable to state that major windfarm proposals and adjacent thoroughbred enterprises are incompatible land uses".

Therefore, the proposed development would have a profound and irreversible effect on our businesses.

Employment, support for local businesses, service provision etc. would be severely impacted.

### **Noise (pages 59 to 76)**

On page 70, Mr. Sadler quotes chapter 13 of the EIAR. He states that the results of the baseline noise monitoring (BN1) at the nearest equine holding (EO1 and EO2) is shown in chapter 13. However, no monitoring was carried out at EO1 or EO2.

The BN1 which he refers to was about 750 meters to the North/West.

Refer to Figure 13.2 Baseline Noise Monitoring Locations BN1 – BN4 in the EIAR Chapter 13.

On page 70 he also refers to Fig 3.11 Noise and Vibration at Property 27 (close to the stables of EO 1 and EO 2) is in the region of 40dB.

On page 71 he states in the case of EO1 and EO2, the farm boundary is adjacent to the lands on which the wind turbines are being located.

This land is used for all of our equestrian enterprises ie. Schooling, galloping, rearing etc.

On page 75 he references Fig 3.14 prepared in accordance with the guidelines set out in chapter 13 noise and vibration of the EIAR.

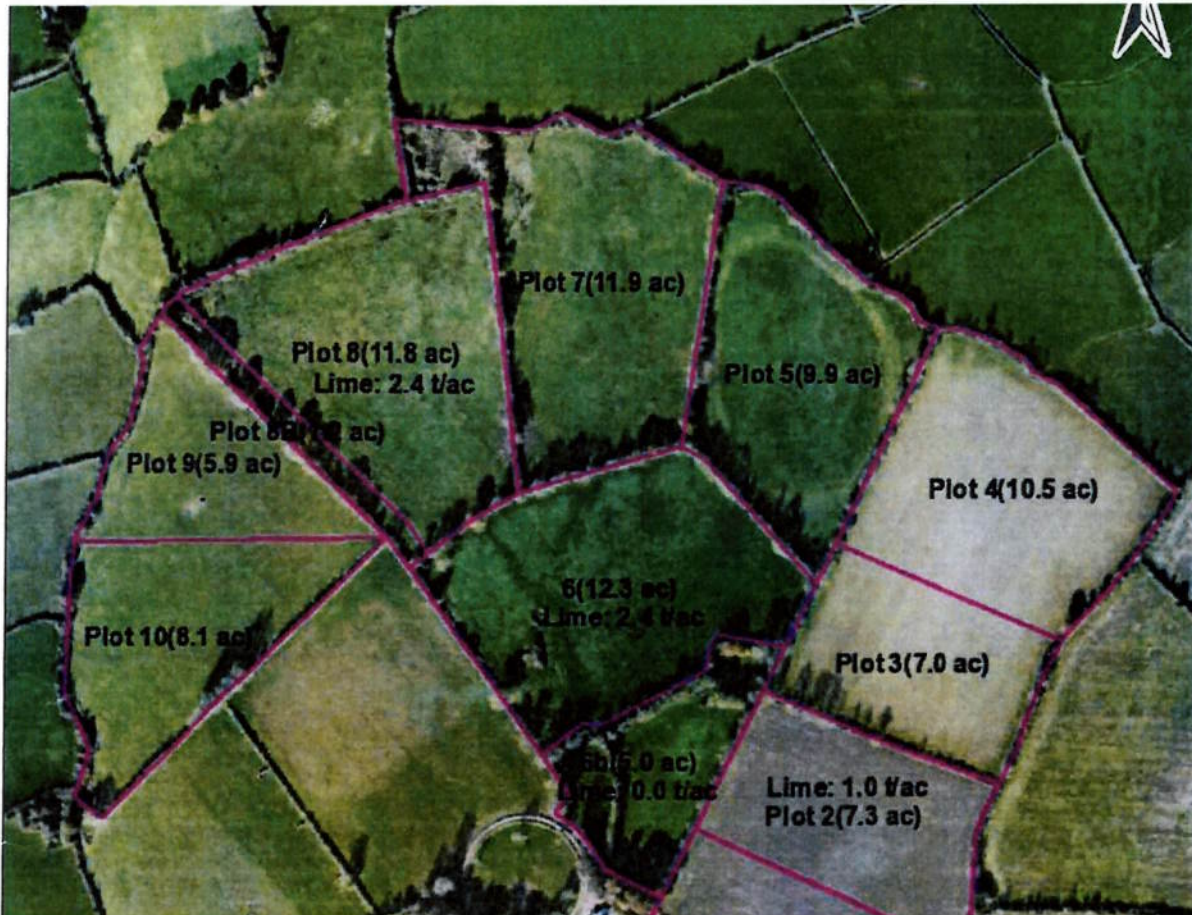
He states that this has been updated to include additional noise bands to show the predicted noise levels up to 70dB.

Fig 3.14 shows the predicted noise contours in the paddocks nearest to the wind turbines.

This means that the predicted noise levels will be significantly higher than the 65dB maximal tolerable noise suggested by Hybrates 2008 which he quotes.

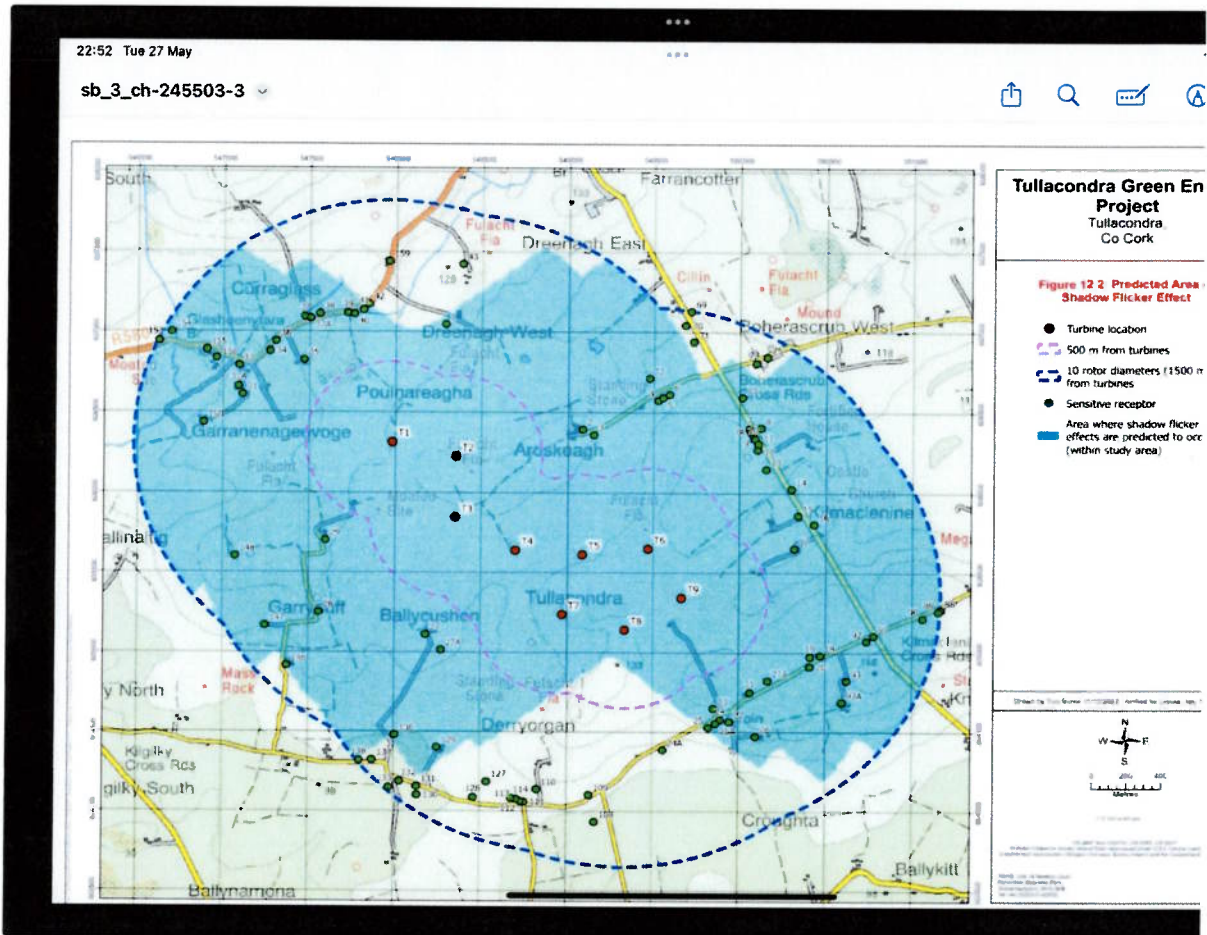
Mr. Sadlier suggests that most of the exercising is carried out furthest from the wind turbines. He reaches this conclusion, despite not carrying out a farm visit, or making any contact with the owners of EO1 or EO2. This opinion can be contradicted by evidence of a gallop in Plot 5, which is the nearest field to the proposed windfarm.

See photograph below.



## Shadow Flicker

Mr. Sadler inaccurately claims that shadow flicker does not apply to horses grazing or exercising outdoors (page 76 Appendix 22.1).



There is significant evidence available that shadow flicker is dangerous to horses and riders.

See supporting documents

- Dr. D P Leadon, Clinical Consultant, The Irish Equine Centre.
- Dr. Carol Nolan, Veterinary Inspector Cork County Council
- Ryan McElligott, CEO Irish Racehorse Trainers Association
- Colin Kehoe, HRI Health and Safety Business Partner
- British Horse Society.

## **Blade Movement**

Horses are easily spooked by blade movement, as evidenced by international literature. The risks to personnel working with and riding horses, is widely recorded.

See supporting documents

- Dr. D P Leadon, Clinical Consultant, The Irish Equine Centre.
- Dr. Carol Nolan, Veterinary Inspector Cork County Council
- Ryan McElligott, CEO Irish Racehorse Trainers Association
- Colin Kehoe, HRI Health and Safety Business Partner
- British Horse Society.

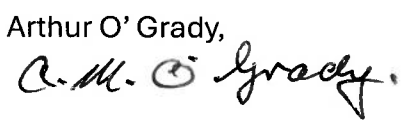
**Conclusion.**

We strongly object to all aspects of the windfarm development Planning Application Reference No. 24/5503 as outlined in our observations and supporting documentation.

Thanking you for your consideration of our submission.

Yours Sincerely,

Arthur O'Grady,

Handwritten signature of Arthur O'Grady in black ink, written in a cursive style.

Eoghan O'Grady.

Handwritten signature of Eoghan O'Grady in black ink, written in a cursive style.

# Comhairle Contae Chorcaí Cork County Council

Eoghan O'Grady  
Ballycushen  
Ballyclough  
Mallow  
Co. Cork

11/09/2024

**APPLICANT:** Tullacondra Green Energy Limited

**DEVELOPMENT:** The Applicant is seeking permission for the construction, operation and decommissioning of a wind energy development including:

- 9 wind turbines each with a blade tip height of 175 metres, rotor diameter of 150 metres, hub height of 100 metres and a rated output of 4.5 megawatts.
- Turbine Foundations, crane pad hardstanding areas and associated drainage.
- Upgrade of existing site tracks and construction of new site tracks and associated drainage.
- Access from the local road L5302 at Crought, Ballyclough including a new site entrance for the construction phase and upgrading of an existing entrance for the operational phase.
- An on-site 38 kilovolt electrical substation to Electricity Supply Board Networks specification to include control building with electrical infrastructure, welfare facilities supplied by rainwater harvesting and storage tank, a wastewater holding tank with high level alarm, car parking, security fencing and lighting, and all associated infrastructure, services, and site works including a temporary construction compound.
- All associated underground electrical and communications cabling connecting the turbines to the proposed electrical substation.
- A temporary site construction compound and associated ancillary infrastructure including welfare services, office accommodation, parking, fencing, lighting etc.
- Areas for temporary storage of excavated materials.
- A permanent meteorological mast of 100 metres height above ground level on a concrete base.
- Installation of approximately 13.5 kilometres of 38 kilovolts underground electrical cabling, mainly within the public road, between the proposed wind farm substation to the boundary of Mallow 110 kilovolt substation at Saint Joseph's Road Mallow.
- All associated site works including site clearance and ancillary development including site drainage/Sustainable Drainage System, security gates, fencing, permanent and temporary signage, and biodiversity mitigation and enhancements, including hedgerow planting.

The Applicant is seeking a 10-year duration planning permission and 35-year operational period from the date of overall commissioning of the entire wind farm. The Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) will be submitted to the Planning Authority with the application. The wind farm development is proposed on a site in the townlands of Polnareagha and Ardskeagh

Pleanáil agus Forbairt,  
Halla an Chontae,  
Bóthar Charraig Ruacháin,  
Corcaigh T12 R2NC.

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Suíomh Gréasáin: [www.corkcoco.ie](http://www.corkcoco.ie)  
Planning & Development,

County Hall,  
Carrigrohane Road, Cork T12 R2NC.

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## ACKNOWLEDGEMENT OF RECEIPT OF SUBMISSION OR OBSERVATION ON A PLANNING APPLICATION

### THIS IS AN IMPORTANT DOCUMENT

KEEP THIS DOCUMENT SAFELY. YOU WILL BE REQUIRED TO PRODUCE THIS ACKNOWLEDGEMENT TO AN BORD PLEANÁLA IF YOU WISH TO APPEAL THE DECISION OF THE PLANNING AUTHORITY. IT IS THE ONLY FORM OF EVIDENCE WHICH WILL BE ACCEPTED BY AN BORD PLEANÁLA THAT A SUBMISSION OR OBSERVATION HAS BEEN MADE TO THE PLANNING AUTHORITY ON THE PLANNING APPLICATION.

PLANNING AUTHORITY NAME **Cork County Council**

PLANNING APPLICATION REFERENCE NO. **24/05503**

A submission/observation, in writing, has been received from:

Eoghan O'Grady  
Ballycushen  
Ballyclough  
Mallow  
Co. Cork

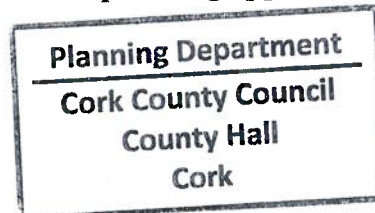
ON 11/09/2024 in relation to the above planning application.

The appropriate fee of €20 has been paid.

The submission/observation is in accordance with the appropriate provisions of the Planning and Development Regulations, 2001 and will be taken into account by the Planning Authority in its determination of the planning application.

*Lauren O'Leary*

Lauren O'Leary  
Clerical Officer



Local Authority Stamp

Date: 11/09/2024

**Cork County Council**  
County Hall  
Cork  
Tel - 021 427 6891  
VAT Registration No - 0007458M

Customer Details  
Eoghan O'Grady  
Ballycushen  
Ballyclough  
Mallow  
Co. Cork

**Cork County Council**

**Receipt : PLG0045767**



11-SEP-2024  
13:32:07

**Header Details**

Receipt Reference: PLG0045767  
Received From: Eoghan O'Grady  
Billing Address: Ballycushen  
Ballyclough  
Mallow  
Co. Cork  
Account No.: POS  
7000004  
Amount Paid (EUR): 20.00  
Type: CASH  
Comments: 24/5503 Submission  
Receipt Issued By: SEANCOOKE  
Receipt Date: 11-Sep-2024  
Site: 0300 : Planning Applications/Submiss  
D/N/U: D  
Invoice Reference: 9000261973 : Cash

**Line Details**

From Reference	To Reference	Transaction Date	Remarks	Amount Paid
PLG0045767	9000261973	11-Sep-2024	24/5503 Submission	20.00

RECEIPT IS ISSUED SUBJECT TO CLEARANCE OF CHEQUE/CREDIT CARD  
ISSUED ON BEHALF OF  
Planning Applications/Submiss,  
Planning Front Office, Floor 1,

# Comhairle Contae Chorcaí Cork County Council

Arthur O'Grady  
Ballycushen  
Ballyclough  
Mallow  
Co. Cork  
P51 XK6H

Pleanáil agus Forbairt,  
Halla an Chontae,  
Bóthar Charraig Ruacháin,  
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04/09/2024

**APPLICANT:** Tullacondra Green Energy Limited

**DEVELOPMENT:** The Applicant is seeking permission for the construction, operation and decommissioning of a wind energy development including:

- 9 wind turbines each with a blade tip height of 175 metres, rotor diameter of 150 metres, hub height of 100 metres and a rated output of 4.5 megawatts.
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- All associated site works including site clearance and ancillary development including site drainage/Sustainable Drainage System, security gates, fencing, permanent and temporary signage, and biodiversity mitigation and enhancements, including hedgerow planting.

The Applicant is seeking a 10-year duration planning permission and 35-year operational period from the date of overall commissioning of the entire wind farm. The Environmental Impact Assessment Report (EIAR) and Natura Impact Statement



We are Cork.



Recycled

Comhairle Contae Chorcaí  
Cork County Council

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**PLANNING AUTHORITY NAME** Cork County Council

**PLANNING APPLICATION REFERENCE NO.** 24/05503

**A submission/observation, in writing, has been received from:**

Arthur O'Grady  
Ballycushen  
Ballyclough  
Mallow  
Co. Cork  
P51 XK6H

**ON 03/09/2024 in relation to the above planning application.**

**The appropriate fee of €20 has been paid.**

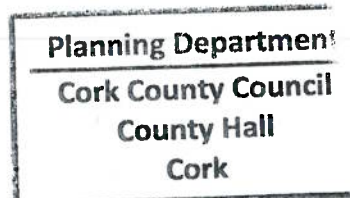
**The submission/observation is in accordance with the appropriate provisions of the Planning and Development Regulations, 2001 and will be taken into account by the Planning Authority in its determination of the planning application.**

*Guy Clarke Hurley*

Guy Clarke Hurley  
Clerical Officer

**Date:** 04/09/2024

**Local Authority Stamp**



**Cork County Council**  
County Hall  
Cork  
Tel - 021 427 6891  
VAT Registration No - 0007458M

Customer Details  
Arthur O'Grady  
Ballycushen  
Ballyclough  
Mallow  
Co. Cork  
P51 XK6H

**Cork County Council**



03-SEP-2024  
14:18:16

**Receipt : PLG0045600**

**Header Details**

Receipt Reference: PLG0045600  
Received From: Arthur O'Grady  
Billing Address: Ballycushen  
Ballyclough  
Mallow  
Co. Cork  
P51 XK6H  
Account No.: POS  
7000004  
Amount Paid (EUR): 20.00  
Type: CASH  
Comments: Sub 24/5503 A O'Grady  
Receipt Issued By: GCHURLEY  
Receipt Date: 03-Sep-2024  
Site: 0300 : Planning Applications/Submiss  
D/N/U: D  
Invoice Reference: 9000261441 : Cash

**Line Details**

From Reference	To Reference	Transaction Date	Remarks	Amount Paid
PLG0045600	9000261441	03-Sep-2024	Sub 24/5503 A O'Grady	20.00

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Planning Applications/Submiss,  
Planning Front Office, Floor 1,