

24th October 2025

An Coimisiún Pleanála
64 Marlborough St,
Rotunda,
Dublin 1, D01 V902

Our reference no: 25-99LCIEA01

RE: Proposed Windfarm development of 7 Turbines, 110kV substation and associated works within the townlands of Leitrim, Lumville, Ballinla, Clarkeville, Ballyfore Big, Ballyfore Little, Ballyeakin and Ballykilleen, in (Coolestown By) Co. Offaly

An Coimisiún Pleanála - Case reference: PAX19.323579

Dear Sir/Madam,

We LCIEA Ltd wish to make the following objections against the above SID application for the following reasons outlined below and can confirm that our property is located as per the attached map. LCIEA Ltd is a family owned and run company and both generations of the family are involved in the day to day activities of Lumville Stud Farm. It is envisaged that in the coming years the younger generation of the family, Emma, Isabelle and Adam Quinn, will assume ownership and responsibility for the continued management of the company and Lumville Stud Farm. This objection should also be read in conjunction with the objection submitted by Colm and Louise Quinn and in particular the very detailed and technical report attached to same. It should also be read in conjunction with the Peer Review of Proposed Ballinla Wind Farm Planning Application prepared by Huson & Associates, W Les Huson BSc(Hons) MSc CPhys MInstP MIOA MAAS which is attached to the same objection of Colm and Louise Quinn. These reports go to the heart of both the validity of the application in the first instance and major technical considerations and reason as to why the application should be refused.

These farms represent decades of dedicated breeding, land stewardship, and agricultural excellence. Ballinla Wind Farm would present a serious threat to the long-term viability and succession of the family enterprise, as the development would fundamentally alter the landscape, environmental conditions, and safe working environment upon which the future of these farms depends.

Our property consists of a Stud Farm which includes 3 No. Dwelling Houses, 2 of which are for staff accommodation, horse stables, sand arena, horse walker, veterinary room, lunging ring, feed room and reception room. By way of background and importance the geographic location of Lumville Stud Farm is perfect for breeding and keeping horses. The limestone enriched pastureland is ideal for horses to graze and thrive. The principal soil association at

Lumville Stud Farm is a grey brown podzolic. The parent material for this soil is predominantly carboniferous limestone. These soils are deep, free draining and have good moisture holding capacity. They are first class grassland soils with High Nature Value Grassland and Lumville Stud Farm is distinguished by its mature and well-established landscaping, featuring a variety of many native mature trees, including mature beech, oak, and ash, which contribute significantly to the visual character, biodiversity, and heritage value of the holding.

Lumville Stud Farm supports a rich and diverse range of wildlife, including several protected species. Regular sightings and nesting activity have been recorded for long-eared owls and kestrels, both of which are species afforded protection under national and EU wildlife legislation. In addition, the lands are home to pheasants and a variety of common but ecologically important species such as rabbits, hares, badgers, and foxes. The established mature trees, and traditional field boundaries provide vital foraging, nesting, and shelter habitats. Any large-scale disturbance, such as that associated with the construction and operation of the proposed Ballinla Wind Farm, poses a risk of habitat disruption, displacement, and long-term behavioural change within these resident wildlife populations.

As our daily work environment at Lumville Stud Farm is agricultural, we spend prolonged periods outdoors and in close proximity to the areas of the proposed turbines. We therefore have serious concerns about the potential health impacts of the Ballinla Wind Farm on those working and living on our farm. In particular, we are concerned about the possible effects of turbine wake phenomena, including changes in local air movement, turbulence, and temperature that may influence livestock conditions and the comfort and wellbeing of people working on the land. These effects, together with noise and shadow flicker exposure, create uncertainty and anxiety regarding the cumulative impact of the development on our physical health, mental wellbeing, and ability to safely and comfortably carry out normal farming activities.

Our farmland at Lumville, Edenderry lies in an area of high nature value grassland (HNV) characteristics—namely lightly-improved grassland, hedgerows and variety of soil types—and has been managed for decades under a low-intensity grazing and pasture regime to support both high-quality livestock and biodiversity. The proposed Ballinla Wind Farm development threatens to compromise this land's ecological integrity: the construction phase, access roads, changes in drainage and wind/turbulence patterns could damage the delicate balance of semi-natural pasture that underpins the HNV status and thus reduce its biodiversity, soil health and ecosystem services. Because HNV grassland is recognised under national and EU policy as farmland of special value for nature conservation and sustainable agriculture, we respectfully submit that the potential impact on this land should be a material consideration in the planning assessment.

Lumville Stud Farm is a superb example of why Ireland is one of the leading producers of thoroughbred horses in the world and in fact is No 3 in the world after only the USA and Australia and greater than the UK and France combined.

Lumville Stud Farm has bred the winners of over 41 Group 1 Races including Champions Baaeed, Muhaarar and Taghrooda amongst others.

We are not aware of any community engagement or education being offered on this development. Such community engagement would of course have been welcomed but in the absence of it we have been left with trying to make sense of it for ourselves and making an objection with extremely limited information at a very late stage.

We recognise the importance of green energy but this area surely cannot be expected to carry far more than its fair share and to now be expected to carry even more of this share.

One of the turbines will be located as close as 300m to our farm and any turbines within 1000m of such highly sensitive and elite thoroughbred bloodstock has been shown to put them at significant risk. Such risk is to the extent that insurers refuse to insure stud farms within 1000m of wind turbines. Many other countries, including the UK and Australia, have legislated for these specific risks.

During our meeting with Statkraft on Friday 5th September 2025, when we raised the subject of Groundwater Wells, Statkraft's representatives had little or no knowledge of any investigation works being undertaken regarding same. The lands surrounding Ballymorán House and farm and Lumville Stud Farm are served by groundwater wells, which provide the primary source of water for agricultural operations. The construction and ongoing operation of wind turbines have the potential to adversely affect these wells through ground disturbance, vibration, and alteration of natural drainage and groundwater flow patterns. Activities such as excavation for turbine foundations, cable trenching, and the use of heavy machinery can increase the risk of sediment infiltration, contamination, or changes in water table levels. In addition, long-term turbine operation may contribute to subtle but cumulative impacts on groundwater stability. It is therefore essential that baseline water quality and yield assessments are undertaken and that robust protection and monitoring measures are implemented to safeguard these wells and the surrounding aquifer but we have no information to show that any of this has been put in place.

Under both EU and Irish law, groundwater resources are afforded a high level of protection. The EU Water Framework Directive (2000/60/EC) and the Groundwater Directive (2006/118/EC) require member states to prevent the deterioration of groundwater quality and ensure the sustainable use of aquifers. These obligations are transposed into Irish law through the European Communities (Water Policy) Regulations 2003 (S.I. No. 722 of 2003) and subsequent amendments, and are implemented through the Environmental Protection Agency (EPA) and the Geological Survey Ireland (GSI) Groundwater Protection Scheme. The GSI framework emphasises the safeguarding of private wells from pollution, changes in hydrogeology, and excessive abstraction. In the context of the proposed Ballinla Wind Farm, any works that could alter groundwater flow, introduce sediment or contaminants, or affect recharge zones must therefore be subject to detailed hydrogeological assessment and continuous monitoring to ensure full compliance with these regulatory protections.

Vibrations from turbines have been shown to affect horses as does shadow flicker and noise as detailed further below.

The average farm has a noise level of 30-45 decibels but with the presence of turbines within 1000km it increases to 50-70 decibels. Once this noise level goes above 50 decibels it triggers “fight or flight” in horses, and this of course poses risks to both horses and humans. In addition to this the intermittent nature of the sound from turbines causes further fright and anxiety to horses and mares, pregnant mares and newborn foals in particular are very sensitive to noise and light sensitivity. This of course is of critical importance for our property and livelihood and the health and welfare of the elite level horses on my property.

Renewable Energy Developments have to be balanced with equine facilities & this requires informed policy frameworks. Recent statements from Planning Authorities indicate the growing tension between renewable energy expansion and the protection of rural sensitive agricultural sectors, which includes racehorses & stud farms. Thoroughbred horses, horse racing & the industry itself are an integral part of our national identity. Ireland is recognised as the world horse industry leader. Ireland is the third largest producer of thoroughbred foals in the world. Only the USA & Australia have more foal births. Ireland exceeds the combined totals of the UK & France.

The UK’s Secretary of State for Communities & Local Government acknowledged, in one of the reasons given for refusing permission for a proposed development of 9 wind turbines, that the proposed development would have a potential significant adverse impact on three nearby equine businesses (stud farms) and that “considerable weight should be attached to this.”

The Planning Inspector who reported to the Secretary of State on this case noted that “There are three particular aspects of wind turbines that have a very significant detrimental effect on horses & riders that compromises their safety. Firstly, the movement of the blades when they suddenly come into view from the road, the gallops or a paddock. Secondly, the shadow flicker which has been known to spook a horse. Lastly, the noise from a group of very large turbines, particularly at start up and on a crowded site such as the southern group of 6, could have a very serious effect.”

The Planning Inspector’s report acknowledged that thoroughbred horses are “high value, highly strung & volatile” and that “where turbines would suddenly appear in the view” or where shadows thrown by turbines are visible “there is the potential for spooking the highly strung & volatile horses.”

The Planning Inspector’s report continued by stating that “Whilst not every horse would be startled & as a result injures itself or its rider, some would. In my view this happening would exist over and above the normal risks these stables experience in dealing with this type of horse. These horses represent a significant investment. Thus, every horse owner who uses these stables & every potential client will believe that their valuable investment will be at risk and as such will go elsewhere. The horse racing industry is highly competitive and one where perception and reputation are significant drivers in choosing a trainer and yard. Thus, it strikes me as inevitable that the businesses would decline and given the particular impact of the windfarm would unlikely be replaced with anything similar.”

Horses have been shown to have significant right forebrain dominance – they are exceptionally adept at processing sensory stimuli (Johnson et al. 2019). Because they are a prey species, the sensory systems of horses have evolved to enable a prompt detection of

potential danger through a combination of visual, auditory and olfactory cues (Christensen et al. 2006, Saslow 2002, Tierärztliche Praxis 1997) and unexpected & hitherto unknown noises cause rapid flight reactions more frequently (Christensen et al. 2005, Algers 1984). Horses are most easily scared by noise that arises outside their field of binocular vision. Hearing ability is thus very important to the survival for horses over the centuries and a horse's ears can pick up sound at a lower level & at a greater distance than that detected by humans (Saslow, 2002). A horse's range of hearing is greater than a human's to higher frequencies >33kHz while the range for humans is under 20kHz.

Horses can show unpredictable anxiety behaviours during any noise producing events, which include sweating, trembling, escape attempts, which may cause severe accidents for the horse and the rider/handler. More than 84% of horses show immediate avoidance and/or attempts to flee after perceived threats (Scopa et al. 2018).

Injury to riders/handlers, etc., is a significant occupational hazard and can extend to thousands of accidents with associated fatalities (Holler 1984, Gimsing 2001). Dealing with an anxious or fearful horse exacerbates this risk. There is a high rate of incidence of injury (26%) among horses 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 (Gronqvist 2016). Noise has also been shown to elicit restlessness, vocalisation & colic/gastro-intestinal disturbances (Dai et al. 2020).

“Noise aversion” or “noise anxiety” are terms used when an animal overreacts to noise. Unpredictable noise causes the greatest fear reactions. These noises can have long lasting effects and have been reported to adversely affect food intake, growth and production rates (Broucek 2014, Tracy et al. 2007, Head et al. 1993).

Severe noise anxiety is reported to cause serious welfare consequences, impacting both the physiology and behaviour of the horse (Riva et al. 2022). Very anxious horses showed signs of noise reactivity and their reactions did not improve with time (they do not habituate with time). Very severe injuries can occur as a result of the unpredictable & very severe anxiety. Riva et al. have also shown that the effects of noise-related anxiety can persist for hours/days after the noise event. It is noteworthy that compared to visual and olfactory stimuli, unexpected unknown noises can cause rapid flight reactions.

Highly sensitive mares & newborn foals are particularly vulnerable to environmental stressors. O'Connor & Walsh (2021) emphasised that pregnant mares exhibit heightened sensitivity to noise and light fluctuations, which may interfere with gestation & increase the risk of premature birth or behavioural distress. Smith et al. (2020) reported that foals exposed to elevated noise levels during early development showed signs of sleep disruption, increased startle responses, and reduced social bonding behaviours. Green et al. (2021) noted that neonatal horses are especially susceptible to visual flicker and tonal noise, which can impair rest cycles and contribute to development instability.

Chronic exposure to such stimuli may result in heightened stress responses, altered behaviour, and compromised physiological stability as evidenced by Jones et al (2019). They also noted increased agitation, visual stress, reduced rest patterns and avoidance behaviours in horses exposed to nearby wind farms.

Many management strategies are used to try to reduce the effects of noise and have been shown to be ineffective (Gronqvist, 2016). Placing horses in stables is 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 (Lesimple et al. 2020). Sedation can often give disappointing results and cause undesirable side effects (Dai et al. 2020) & long-term sedation and or stabling is impractical & inhumane.

2025 Planning Authority Statements underscore the growing tension between renewable energy expansion and the protection of sensitive agricultural sectors, including equine studfarms. An Bord Pleanála (2025) reported that of the 69 energy cases reviewed in the period 2023 – 2024, several windfarms were refused as a result of objections citing proximity to studfarms. In several decisions, the Board cited concerns over elevated noise levels and their potential impact on equine welfare. The Board emphasised the need to balance strategic infrastructure development with environmental and agricultural sensitivities.

It is noted that ABP 23-225138 on appeal from Tipperary County Council 07/111 refused planning permission for a biogas & biodiesel production facility at Castleblake, Rosegreen, County Tipperary for the following reason:

“The site of the proposed development is located in open countryside in an area of national importance for the bloodstock industry alongside a major horse training establishment. It is the policy of the planning authority, as set out in the current South Tipperary Development Plan, to support the equine industry. It is also the policy of Government to support the equine sector. It is considered that the proposed development of this large scale industrial type facility at this location, employing the particular technology on the scale proposed, having regard to its nature, scale and visual impact, would be incompatible with equine related activities in the vicinity and would be prejudicial to the viability of the equine industry in this area (including undermining confidence therein). Notwithstanding the desirability of providing such facilities, it is considered that the proposed development would seriously injure the amenities of the area and property in the vicinity, would be incompatible with the surrounding land uses, and would, therefore, be contrary to the said Development Plan objectives and to national policy and to proper planning and sustainable development of the area.”

“The equine industry and in particular the bloodstock industry is a highly competitive commercial industry, which needs a high quality in relation to environmental standards and what could best be described as a clean image. The area of County Tipperary has developed a niche industry comparable with other bloodstock areas as for example Newmarket & Kentucky with major financial benefits to the area and any consideration of permitting development must have consider policy ENV11, for proposals for non-agriculture related development.”

The Planning Inspector noted that it could be necessary and appropriate to invoke the Precautionary Principle “as we are not talking about just any agricultural operation, but one of the international leaders, a business that carries Ireland’s reputation in the bloodstock industry and one which the local economy benefits well beyond the level were it to be on only local, or minimal standing.”

The Planning Inspector’s report also noted that it should be a consideration in the planning process if one successful enterprise of benefit to an area’s economy is placed at risk by a development, which is not by its nature locationally tied to the area. The Planning Inspector stated that “the onus is on any new development in the rural area and in particular non-

agricultural development, which for reasons already outlined is not specifically locationally dependent to a rural area to demonstrate that it will not have a negative impact on the viability of existing stud farms or stables and that it is reasonable to consider the development in this context.”

There are many factors that contribute to foreign investment in the thoroughbred industry in Ireland – our world class expertise, highly skilled professionals, rich biodiversity and soil quality and beautiful, unblemished countryside.

It is critical that the safe and continued operation of thoroughbred studs, stables and training yards are protected from incompatible and inappropriate forms of development that have the potential to directly affect the operation of the facilities or give rise to a perception that the operations may be compromised.

One of the major advantages of the industry is that it provides significant employment and economic activity in rural areas where there can be a shortage of other employment opportunities.

Further to the above I have the following further concerns:

1. The visual affects of such large turbines is simply a matter of fact and the utter proliferation of such large turbines in the immediately surrounding area is something that does not appear to exist elsewhere. We recognise the importance of green energy, but this area surely cannot be expected to carry far more than its fair share and to now be expected to carry even more of this share.
2. The red lights at nighttime will be a significant issue for the dwelling houses on the farm and again the cumulative effect of this together with existing red lights in the vicinity is something that we feel is very unfair for us to have to tolerate forever and extending into the lifetimes of our children.
3. Due to the proximity of the turbines and the number of them we are extremely concerned regarding the wake affect on us and the future viability of elite equine stock on our lands.
4. Is the future development of the farm now to be effectively sterilised due to the presence of the windfarm either by refusal of planning permission or the simple desire of people and the next generation not wanting to live here?

We are aware that there is cross community support against this development, and fully support the objection of our neighbour's, including those with very significant health, equine and animal welfare concerns.

We truly believe there is nothing to recommend this application to us or to the people of this area and we call on An Comisiún Pleanála to refuse permission for this application for all of the reasons outlined above.

Yours Sincerely.

LCIEA Ltd

Date: 23/10/2025

LCIEA Ltd

Lumville Stud

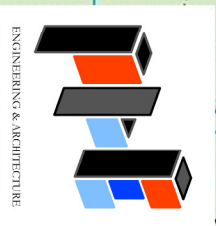
Lumville House

Lumville

Edenderry

Co. Offaly

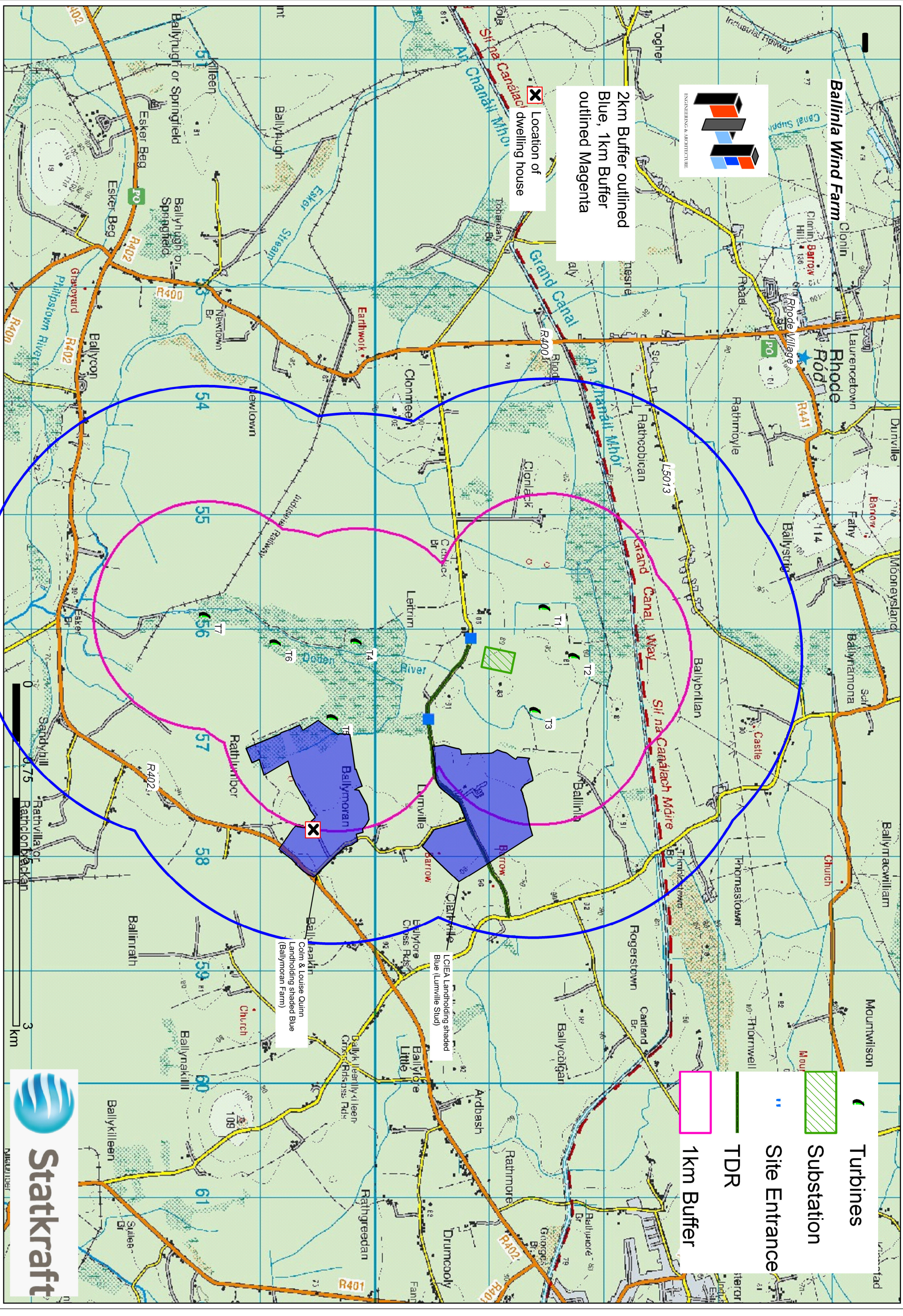
R45 CD70



Ballinla Wind Farm

2km Buffer outlined
Blue, 1km Buffer
outlined Magenta

 Location of
dwelling house



 Turbines

 Substation

 Site Entrance

 TDR

 1km Buffer

LCIA Landholding shaded
Blue (Lumville Stud)

Coim & Louise Quinn
Landholding shaded Blue
(Ballymoran Farm)