

BRICKFIELD STUD,
THOMASTOWN,
EDENDERRY,
CO OFFALY,
R45HN99

23rd October 2025

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

Our reference no: 25-99FCL01

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,

I wish to make the following objections against the above SID application for the following reasons outlined below and can confirm that my property is located as per the attached map. My property consists of our family dwelling house, horse stables, horse walker, lunging arena, horse gallop, and approximately 100 acres of grazing land. Thoroughbred foals are bred on the property and live outside on the grassland for their first year of life until we prepare them for sales. I also hold a trainer's licence and have a number of thoroughbred racehorses on the farm, as well as a number of eventing horses which my children ride to an international standard.

One of the turbines will be located as close as 1800m to our land and any turbines within such a close distance to highly sensitive and elite thoroughbred bloodstock has been shown to put them at significant risk. Many other countries, including the UK and Australia, have legislated for these specific risks.

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 in such close distance, 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 my property and livelihood and the health and welfare of the elite level horses on my property. Our farm's enterprise, and in turn my family's livelihood, is primarily based on the selling of thoroughbred foals at auction. The preparation for this involves a

BRICKFIELD STUD,
THOMASTOWN,
EDENDERRY,
CO OFFALY,
R45HN99

great deal of outdoor hand-walking of the foals. Given their sensitive nature, small changes in the environment can pose a great risk to both their safety and the safety of my family and staff while undertaking this preparation. Furthermore, the racehorses and eventing horses trained on the property are incredibly sensitive to sound and light, posing a huge risk to riders.

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."

BRICKFIELD STUD,
THOMASTOWN,
EDENDERRY,
CO OFFALY,
R45HN99

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, Tierartzliche 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 humans 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, which comprise the majority of our stock and therefore our livelihood, 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

BRICKFIELD STUD,
THOMASTOWN,
EDENDERRY,
CO OFFALY,
R45HN99

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 Pleanala (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

BRICKFIELD STUD,
THOMASTOWN,
EDENDERRY,
CO OFFALY,
R45HN99

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. Due to the proximity of the turbines and the number of them we are extremely concerned regarding the wake affect on us and the equine stock on our lands. Given the sensitivity of thoroughbred racehorses and foals, small changes have the potential to be devastating to our enterprise and therefore devastating to our livelihood. We are aware that this has all been examined in detail in 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 and we understand that this report goes to the heart of major technical considerations and reason as to why the application should be refused. This report we understand has been submitted as part of a separate objection to this planning application.
2. The visual effects of such large turbines are simply a matter of fact and the utter proliferation of such large turbines in the immediately surrounding area is something

BRICKFIELD STUD,
THOMASTOWN,
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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.

3. The red lights at nighttime will be a significant issue for us 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.
4. Is the future development for dwelling houses for our children and families 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 our children not wanting to live here?

I am aware that there is cross community support against this development, and I fully support the objection of our neighbours, 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.



Date: 23/10/2025

Frances Crowley
Brickfield Stud
Thomastown
Edenderry
Co. Offaly
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Ballinla Wind Farm

2km Buffer outlined
Blue, 1km Buffer
outlined Magenta

X Location of dwelling house

Frances Crowley -
Brickfield landholding
shaded purple

Turbines

Substation

Site Entrance

TDR

1km Buffer



Statkraft

IRISH THOROUGHBRED BREEDERS' ASSOCIATION

Company Limited by Guarantee

ITBA Greenhills, Kill, Co Kildare, W91 FY62

Tel: 045-877 543

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24th October 2025

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

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 wish to add our full support to the objections to the above proposed development on behalf not only of our members, Ringfort Stud, Lumville Stud and Brickfield Stud, but also on behalf of the wider equine community who will be adversely impacted if this sizeable industrial windfarm gets planning permission.

Ireland cannot claim to be a world leader in very many things, but the area of thoroughbred breeding and racing is one of them. As stated in Horse Racing Ireland's 2023 report by Deloitte, the Irish Breeding and Racing industry is worth €2.46 billion in direct or stimulated expenditure, showing a growth of 34% in six years. Over 30,000 full time employees were listed, largely key employers in rural areas.

There are a number keepers of equines in the area (including the three studs mentioned above) surrounding the proposed site and one of them is one of the most significant and successful studs in the country, namely Ringfort Stud. In the last five years alone they have bred leading Group 1 winner and flat stallion Minzaal and this year, Group 1 winning sprinter, Big Mojo. This significant wind development would have a hugely detrimental effect on the highly sensitive young athletes being bred there. Indeed all the aforementioned studs have a tremendous history in the area and rely on the environment they currently enjoy to raise young thoroughbreds in conditions which are the envy of other parts of the world.

The value of the bloodstock in these farms runs into the many multiples of millions and they are notoriously sensitive animals and disturbance could

cause injury, stress which could be responsible for all kind of issues including abortions in pregnant mares and risk the safety of both the horses and those charged with taking the highest levels of care of them, which they require.

In addition to direct employment these stud farms also have an economic impact through purchasing hay and straw from local merchants not to mention vets, farriers, farm contractors, feed companies etc. All of these are local Irish businesses that rely on the stud farms to run in an efficient manner for their livelihoods.

The lands, which all of these stud farms are custodians of, are of such high quality that they have been specifically chosen for the purpose of breeding the Irish thoroughbred. An equine athlete which is admired all over the world. Allowing a windfarm of this magnitude in this area would be frankly negligent.

We understand that increasing renewable energy sources is imperative for Ireland as we try to combat the global climate change. Under the Climate Action Plan 2023 (CAP23), Ireland aims to achieve 80% renewable electricity generation by 2030. We are supportive of this but it is the correct implementation of this that is the key for us all. Currently there is no factoring in of equine welfare or our important thoroughbred breeding and racing industries in the current planning guidelines. This is in stark contrast to other countries such as France, Germany, Australia and the USA

Our members are very concerned about the very real risk of their thoroughbreds being adversely affected by these turbines as it is well known and widely documented the detrimental impact they have on them. For example...

- Being directly located within their range of vision. This is grounded by the fact that horses utilise what is termed the "flight response" in response to stimuli. Thoroughbreds are bred to accentuate this flight response and are less able to acclimatise to such a stimulus. The startled reaction of flight response can lead to serious injury to horses and people working with them. Injuries to young horses impact on their physical development and subsequent athletic performance.
- Significant disturbance as a result of noise and infrasound and the flicker of light reflecting off the rotating blades during periods of low sun and on the shadows of the blades during daylight hours which are also shared by many horse owners.

Foreign investment is attracted to Ireland because of the quality of our land and the green approach. Every year significant numbers of foreign mares are sent to Ireland for covering and any large scale wind turbine development such as this could risk the financial viability of the local thoroughbred industry in its current form, resulting in a flight of capital from these studs and stables.

In summary, if this planning application were allowed to go ahead, it would have devastating effects on the local stud farms who are key players in an industry of which we as a nation are world leaders. We therefore fully support their objections to this proposed development.

Yours sincerely



Peter O'Reilly

CEO

Irish Thoroughbred Breeders Association CLG

Email: poreilly@itba.ie

Mob: 087 2503003



Our Ref: FC/AF

24th October 2025

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,

I write to you on behalf of Frances Crowley who is a member of the Irish Racehorse Trainers Association (IRTA).

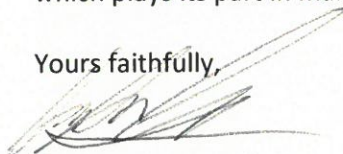
In recent weeks Mrs Crowley of Brickfield Stud, Thomastown, Edenderry, Co. Offaly contacted me as the head of her representative body to outline her concerns about the development of a wind farm adjacent to her premises.

As Mrs Crowley has outlined to you, a wind farm represents a hazard for her business as there will exist a significant health and safety hazard to both horse and rider. The British Horse Society (BHS) 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 Mrs Crowley's training business to the point where closure and the winding up of the business is a real and live possibility. It would be very difficult, or impossible to get employer liability insurance. The business cannot operate without adequate insurance cover. This would impact negatively on several levels, staff redundancies and indirect employment (vets, farriers, transport companies, horse feed suppliers and small businesses in the local community).

Any development that could impact one of the IRTA's members to this extent is one of serious concern to our organisation. Our 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 extremely regrettable.

Yours faithfully,



Feidhlim Cunningham
CEO IRTA