

Michael Hunt
Orchard House, Ballinamoe
Shinrone, Birr
Co. Offaly
R42 Y821

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

25th June 2026

Case Ref: Planning Application PAX 92.324279 — Proposed Ballincor Wind Farm, Co. Offaly

Dear Inspector,

My name is Michael Hunt. My family and I live at Orchard House, Ballinamoe, Shinrone, Co. Offaly. There are four of us in the household. We have owned and lived in this house for almost twenty years. Stables are attached to the house, and we have breeding and foaling thoroughbred mares, foals and yearlings on the premises through the year. My professional life has been spent in the equine industry for more than twenty-five years. I am an Irish Master Farrier, American Certified Farrier and European Certified Farrier, and I have worked across multiple jurisdictions in that capacity. I am writing to ask An Coimisiún Pleanála to refuse planning permission for the proposed Ballincor Wind Farm, and I want to set out why.

Our home is Receptor 53 (H053) in the developer's own assessment. The nearest of the proposed eleven turbines, Turbine 6, would stand 854 metres from our house. Three more turbines — T5 at 1,136 metres, T7 at 1,148 metres and T4 at 1,607 metres — sit within the shadow flicker study area. The developer's own model shows our property exposed to 73 hours and 33 minutes of shadow flicker per year in the worst case, across 144 days, with a single-day maximum of 47 minutes. Of more than three hundred properties on this site, only five carry a higher figure. Of those 144 days, Chapter 16 reports only 86 — the remaining 58 days of shadow flicker, recorded by the developer's own software, appear nowhere in the chapter placed before the Board. T06 and T05, seen from our property, sit close enough in bearing that the sun passes behind both turbines simultaneously for approximately 101 minutes per suitable shadow day; T06 and T07 produce a similar compound window of around 81 minutes. Compound multi-turbine flicker of that kind has not been assessed at our home, or at any other property in the application.

The developer's own noise modelling, when the mandatory valley correction required by its own chosen methodology is applied, predicts a night-time noise exceedance at our home of 1.6 decibels — the joint-largest confirmed exceedance for any non-stakeholder house on the entire site. The proposed turbines would occupy more than one hundred and twenty-two degrees of our visible

horizon, with the rotors of three of those turbines spinning at a level below the ground my home stands on.

The Community submission includes a separate, more detailed analysis on the technical position on noise and shadow flicker at this property, including the mandatory JOULE valley correction the developer did not apply, the unverifiable sunshine data the shadow flicker model relies on, the absent amplitude modulation assessment, and the unassessed infrasound exposure at 854 metres from a 180-metre tip-height Nordex N163. I will not repeat that ground in this letter but I accept it entirely. What I will set out here is the rest of what this development would do to us, and why the personal and professional weight of those impacts requires refusal.

My living and my family's income come from horses. We do not keep horses as a hobby. We breed Thoroughbreds on the premises and we have foals, yearlings and mares cycling through the stables and paddocks attached to the house through every season of the year. As an Irish Master Farrier with American and European certifications, I have spent more than two and a half decades working with horses of every breed and every temperament across multiple countries. I say what follows from that experience, and it should be taken as the view of a working equine professional rather than the view of a worried neighbour.

Thoroughbreds are not interchangeable with other breeds when it comes to environmental stress. They have been selectively bred for more than three hundred years for athletic performance, and the side-effect of that breeding — well documented in the peer-reviewed veterinary literature — is a significantly elevated cortisol stress response compared to calmer breeds. The published study most often cited on this point examined 149 sport horses in Switzerland under standardised stimulation testing and found Thoroughbreds showed statistically significant elevated post-stimulatory cortisol concentrations. That elevation matters in three specific ways for what we do here. In breeding mares, chronic cortisol elevation suppresses the reproductive hormone system. The published association is with impaired conception rates and early pregnancy loss. For a stud operation that is not a welfare abstraction — it is empty mares and foals that are not born. In foals, the first weeks of life are spent before any environmental stimulus has been habituated. A flight response in a foal at the wrong moment results in fence collision, separation from the mare, or worse. There is no shadow flicker threshold for foals in any guidance anywhere in the world because the assessment framework was not designed for foals. In behavioural welfare terms, chronic environmental stress in Thoroughbreds is associated with stereotypic behaviours, gastric ulcers (which already affect up to ninety per cent of Thoroughbreds in training), and unpredictable reactivity. These are not theoretical concerns. They are the day-to-day realities of running a Thoroughbred operation.

The shadow flicker assessment for this development was carried out for human occupants of buildings. The receptor point at our property was placed at the dwelling. The stables and paddocks attached to our home were not modelled as horse receptor points, because no such category exists in the developer's framework. The horses we keep on the premises will spend their daily lives inside the shadow zones of four turbines at distances starting at 854 metres. The animals were never assessed. The British Horse Society explicitly identifies shadow flicker from wind turbines as a horse-

spooking hazard along equestrian routes. The EU Reference Centre for Animal Welfare for Ruminants and Equines confirmed in October 2024 that direct controlled research on shadow flicker and horses does not exist. The developer has therefore done two things: it has assessed the wrong receptor (the building, not the animals it houses), and it has done so in the absence of any direct evidence that the species it has chosen to ignore are not at risk. For a stud operation that is the foundation of a family's livelihood and a Master Farrier's working environment, an assessment of that character is not a basis on which to grant permission.

Horses also register low-frequency sound and ground vibration through hooves and teeth as well as through hearing — a dual sensory pathway documented in peer-reviewed Thoroughbred acoustic research. A 1.6 decibel night-time noise exceedance at the house is not just a number on a page for the people in the house. It is an exposure that the animals in the stables attached to the house, and in the paddocks immediately around it, will share by an entirely different physiological route. The amplitude modulation that the developer concedes it cannot predict at planning stage is exactly the kind of rhythmic, pulsing acoustic signature that veterinary behavioural research identifies as a non-habituating stressor in anxious animals. There is no acoustic mitigation in this application that addresses any of this. There is no equine welfare assessment at all.

The visual impact of this development on our home is in a different category from anything currently in our landscape. One hundred and twenty-two degrees of our horizon — more than a third of the full circle visible from a single point — would be occupied by the proposed turbines. T6 at 854 metres is the nearest, but three of the eleven would sit closer than 1.5 kilometres and four within the shadow flicker study area. All eleven proposed Ballincor turbines will be visible from our property — together with six of the existing Knockshegowna turbines, already in our view 1.3 kilometres away. Seventeen wind turbines, across two farms, in a single field of view. Because my home sits at 72 metres above sea level on slightly elevated ground, three of those rotor discs would be spinning below the level of the floor we walk on. I look across at these machines and, in three cases, down into the rotor sweep. That is not a marginal viewing geometry. It is a 180-metre tip-height industrial installation arranged across the working approaches of our property at a scale that no other development in this area has come close to. The Carrig wind farm has been consented to the west. The cumulative landscape into which Ballincor would be added is already heavily marked by industrial wind infrastructure; this application would close the loop.

Swallows nest in significant numbers on the fabric of our house. There are five active nests on the building at the time of writing this objection, and the same birds return every year. Swallows are protected under the EU Birds Directive and the Wildlife Acts. They are also a species in widely documented decline across western Europe, and our house — by accident of how it sits in the landscape, what insects the bog and the surrounding farmland generate, and the building materials of the eaves and stables — is a functioning breeding habitat for them. I have read the developer's biodiversity assessment for this application. Hirundines are not given individual collision risk assessment. The bird survey effort, by the developer's own admission, was almost entirely conducted outside dawn and dusk, which is precisely when aerial insectivores like swallows are most active in

their foraging flights. The proximity of the proposed turbine cluster to a known multi-nest swallow site at the edge of the bog has not, on any reading of the application I have been able to make, been addressed. We are also in the highest-density barn owl breeding area in Ireland, on the developer's own cited evidence. The ornithological assessment for this application has been independently reviewed and found to be deficient in ways that no condition can subsequently repair.

On the financial position I will be direct. This house is what we have. We bought it almost twenty years ago, we have invested in it continuously since, and the equity in it is — straightforwardly — our retirement. The peer-reviewed literature on wind turbine property value impacts in rural areas is consistent: reductions in the range of three to sixteen per cent depending on distance, visibility and turbine size, with the strongest effects on detached rural properties within one kilometre of large modern turbines. We are 854 metres from a 180-metre Nordex N163. The only Irish-specific study of wind turbine effects on house prices, using Property Price Register data (Gillespie & McHale, University of Galway, 2023), found statistically significant negative effects. The published evidence (Dröes & Koster, 2021) is specific that turbines over 150 metres have a measurably larger negative effect than smaller machines — and Ballincor's turbines are 30 metres taller than that threshold. A property that sits within shadow flicker of four turbines at the documented intensities, with a confirmed night-time noise exceedance and 122 degrees of horizon dominance, will not sell for what an identical property in a comparable area without those features will sell for. The capital loss to our family is not a simple amenity question. It is the difference between what we can retire on and what we cannot.

The Offaly County Development Plan designates the area within which this site sits as unsuitable for wind energy development. That designation is not a preliminary view to be argued around. Since the Coolglass ruling, both planning authorities and An Coimisiún Pleanála are required to give that designation real weight. The reasons the policy exists — landscape sensitivity, ecological designation, the proximity of European sites, the rural residential pattern — apply to this application with full force. The application before the Board has not demonstrated any basis on which that policy should be set aside.

Drawing the strands together. The technical noise and shadow flicker analysis demonstrates that the developer's own numbers, produce a confirmed night-time noise exceedance and a shadow flicker exposure likely beyond the regulatory thresholds at our home. The equine assessment for this application does not exist — the stables and paddocks attached to our home, and the Thoroughbred breeding operation we depend on, were never modelled, and the published veterinary evidence on Thoroughbred stress physiology is treated nowhere in the application. The visual impact at 122 degrees of horizon with three rotors below my own ground level is in a different category from anything else in this landscape. The five active swallow nests on our house are part of a habitat the bird survey was structurally incapable of properly evaluating. The financial loss to our family — the retirement we built into this property over twenty years — is real and is supported by the published Irish and international literature. The County Development Plan policy designates this area as unsuitable for the development, and that designation has weight.

I am asking An Coimisiún Pleanála to refuse planning permission for the proposed Ballincor Wind Farm under reference PAX 92.324279. The application cannot lawfully operate at night without exceeding the noise limit at our home, on the developer's own numbers under the developer's own methodology. No subsequent monitoring condition can repair an assessment that did not measure what it was supposed to measure. No mitigation measure can retrospectively rebuild a stud farm's reproductive performance, recover a foal lost to a flight response, or restore the breeding success of a swallow population the surveys never recorded. The application should be refused.

Thank you for considering this submission.

Yours faithfully,

Michael Hunt

Irish Master Farrier; American Certified Farrier; European Certified Farrier

Orchard House, Ballinamoe, Shinrone, Birr, Co. Offaly, R42 Y821