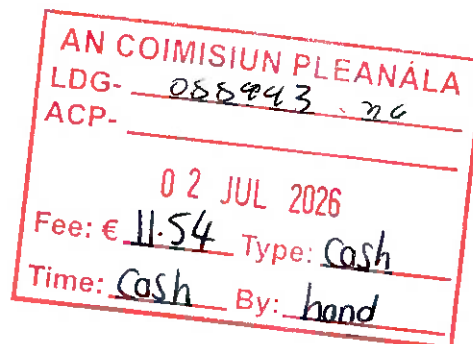


WRAYMOUNT STUD

SHARAVOGUE, BIRR. CO. OFFALY R42YY38

An Coimisiun Pleanála,
64, Marlborough St.,
Dublin 1
30/6/2026



Dear Sir/Madam

ref: PAX 92.324279

Proposed Ballincor Wind Farm Development

Objection from Patrick and Barbara Ann Headon,

Irish thoroughbreds are world leaders and are a very successful export business of which we are an active participant. Our farm is Wraymount Stud, a family run breeding farm for thoroughbred horses. It is a very quiet sheltered stud farm. The limestone enriched land is ideal for horses to graze and thrive. I am over 50 years in the business. Many winners have been bred here- over 300 including Black Type (higher class) winners. The whole farm has a natural approach which includes promoting local bio diversity. No artificial fertiliser has been spread in over 30 years. Apart from my own mares and stock, I have developed a relationship with overseas clients who put their trust in me to look after their very valuable mares and foals on my farm. We visit top stallions and have excellent fertility. Anything that could disrupt this causes us great concern. We understand the thoroughbred, they are very sensitive, can be volatile, need a calm environment with quiet settled conditions. The safety of our animals is paramount. Noise, Shadow Flicker, Vibrations could startle them and cause them injury, or staff injury, which could lead to insurance claims/ compensation. Pregnant mares exhibit heightened sensitivity to noise and light fluctuations which may have detrimental effects on successful foal births. 7 of the 11 Turbines are clearly visible to our horses. Also during summer when the horses are out 24 hours the Shadow Flicker from the red marker lights will frighten them and could cause fight or

flight response especially to young stock and mares leading to serious injuries or death. The bloodstock on our farm are very valuable.

The Irish Thoroughbred Breeders Association (ITBA) have supported us in our objection, letter attached, as have other stud farms. Letter of support from Kildangan Stud, for example.

We believe these turbines will be very detrimental to our business. Large acreage will be rendered unusable for thoroughbred breeding. Business will become unviable. Our clients will take their horses away if this proposal goes ahead. It is arrogant in the extreme that a foreign company can come in and affect our livelihood and that of our children like this.

RWE note our existence in their application but their research did not take our breeding operation into consideration. The effects of turbines on these paddocks and our stock has not been assessed. They referenced our house only. Under the EIA Directive (2011/92/EU as amended) and the Planning and Development Regulations, an EIAR must identify and assess the significant effects of a development on all sensitive receptors. The argument is that naming Wraymount Stud, the dwelling house, as Receptor 162 for shadow flicker but failing to assess the whole farm as an equine breeding operation is a material omission rendering the assessment legally incomplete. An Coimisiún Pleanála cannot lawfully grant consent on the basis of an EIAR that fails to assess significant effects (the Connelly v An Bord Pleanála line of reasoning on adequacy of reasons and assessment is relevant here).

Being an established stud farm it commands a higher value in the event of any future sale. No perspective breeder/buyer would be remotely interested in land beside turbines for a breeding operation. Thus this proposal devalues our farm.

This proposed wind farm is on an ill chosen site. Offaly Co. Council has designated this area as not suitable for wind farms. Even RWE said at a clinic that this site was “challenging”.

The access to the proposed site is going to be immediately over 2 small, very old but lovely bridges which let alone being dangerous for

drivers to stop there ,may not handle all the construction traffic. The Sharavogue Bridge,built 1850,over the Little Brosna and beside it a skew arch road-over-railway bridge built 1858 , historically important The site then is approached on callow land which floods from the Little Brosna river running along side it. My land goes down to this river on the opposite side.

We are being urged constantly by Government to preserve the local environment and bio diversity.

This development will be akin to open cast mining and amounts to environmental vandalism and will destroy much of the local biodiversity. It will affect the preserved bog across the river. This is an SAC and has been called "The Jewel in the Crown" and "The Book of Kells " of raised bogs. The local natural beauty will be destroyed for ever.

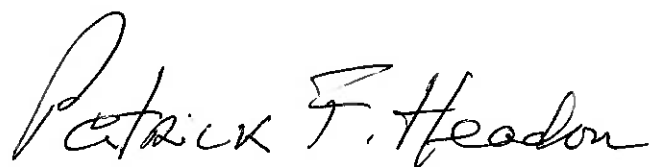
A study published by The Farm Peat project showed that raised bogs can store up to 13 times more carbon per hectare than The Amazon Rain Forest as carbon is stored underground instead of short lived vegetation

Ourselves and our neighbour have worked tirelessly since 1989 to preserve Sharavogue Bog, designated SAC for posterity with all its bio diversity and rare plants. The Little Brosna and its aqua life is at severe risk of pollution damage caused by construction. Wild fowl will be seriously affected negatively. We think it is vitally important to continue preserving this Special Area of Conservation and the adjoining wild lands. This development will totally go against these efforts.

We are not against wind farms per se but this is a very inappropriate site. Our objection should be read in conjunction with that of the Greater Birr Wind Action Group.

This proposed development should not be granted permission

Yours sincerely,

A handwritten signature in cursive script that reads "Patrick F. Heaton".

BA Heaton



GODOLPHIN IRELAND LIMITED

Kildangan Stud Monasterevin Co Kildare W34 HR98 Ireland Telephone +353 (0) 45 527600

10.6.26

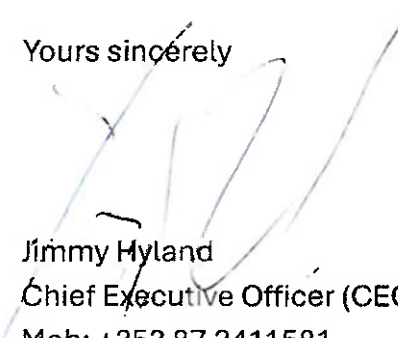
To whom it may concern,

We are supporting this letter as outlined below from the ITBA.

Wraymount Stud are very good clients of ours and any impact on their business will have a direct impact on ours.

If you would like to further discuss this matter, please do not hesitate to contact me.

Yours sincerely


Jimmy Hyland
Chief Executive Officer (CEO)
Mob: +353 87 2411581

Godolphin
Kildangan Stud, Monasterevin, Co Kildare,
www.godolphin.com

IRISH THOROUGHBRED BREEDERS' ASSOCIATION

Company Limited by Guarantee

ITBA Greenhills, Kill, Co Kildare, W91 FY62

Tel: 045-877 543

Email: office@itba.ie

www.itba.ie

28th May 2026

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

*Re: Proposed Windfarm development of 11 Turbines in the Sharavogue Bog area in
Birr, Co. Offaly*

Dear Sir/Madam,

We wish to add our full support to the objections to the above proposed development on behalf not only of our member, Wraymount 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. The industry supports a skilled 30,000 + workforce and supports family-run farms and businesses that have been part of the rural economy for generations.

There are a number keepers of equines in the area (including the aforementioned Wraymount Stud) surrounding the proposed site and Wraymount itself is a top class farm of over 200 acres that has produced many top class group and listed winner over the years both in Ireland and abroad such as Who's Steph and Manhattan Jungle. This significant wind development would have a hugely detrimental effect on the highly sensitive young athletes being bred there never mind the band of 20 plus broodmares as all are nurtured in environmental conditions which are the envy of other parts of the world.

The value of the bloodstock on this farm alone is significant and thoroughbred horses 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 farms such as Wraymount 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 Wraymount has been such a careful custodian of (they have preserved a 550 acre raised bog purely of their own accord), 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 particularly when County Offaly has more than taken its fair share of wind turbines. 229 turbines are now operational, approved or proposed within the County at this juncture.

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 Wraymount Stud which is a key player in an industry of which we as a nation are world leaders. We therefore fully support their objections to this proposed development.

Yours sincerely

A handwritten signature in black ink, appearing to read 'P. O'Reilly', with a large, sweeping flourish extending to the right.

Peter O'Reilly
CEO

Irish Thoroughbred Breeders Association CLG

Email: poreilly@itba.ie

Mob: 087 2503003