

Marie-Clare Power & John Richmond
Uregare
Kilmallock
Co. Limerick
V35 WN50

The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902
CASE REF: **323635-25**

Date: 26th September 2025

Re: 9 no. wind turbines, grid connection and all associated site works. Located in the townlands of Garrane, Ballynagoul, Creggane and Charleville, Co. Limerick

To Whom It May Concern,

I Marie-Clare Power and John Richmond, write in connection with the above listed planning application at Garrane, Ballynagoul, Creggane and Charleville, Co. Limerick., An Coimisiún Pleanála - Case reference: **PAX91.323635** to construct 9 no. wind turbines, grid connection and all associated site works.

We wish to object strongly to this proposal and ask that the Board refuse planning permission.

Some of our summarised observations and concerns are as follows:

- **Visual Distraction posing risk of accidents**

Figure 1 below is an image taken from Google Maps section of road N20 where there are extensive views approaching bend on the right hand side of the proposed site coordinates:
Latitude: 52.38065274071072 / Longitude: -8.682624938133483

A photomontage included in the EIAR for the proposed project shows how this section of road on the N20 from Charleville to Limerick will be altered with the presence of 9 enormous mega-structures as proposed. Refer to Figure 2: **VP7A** from the Photomontages Book 1 Vp1 – VP12. This image is truly shocking in scale, the location of which is on a continuous white line approaching a sharp bend which has been the location of many serious road accidents over the years. The immediate concern I would have for general road users is that people would be startled by the overbearing presence and their attention drawn, and therefore their attention diverted from the road. On a continuous white line on a bend, this is a major concern.

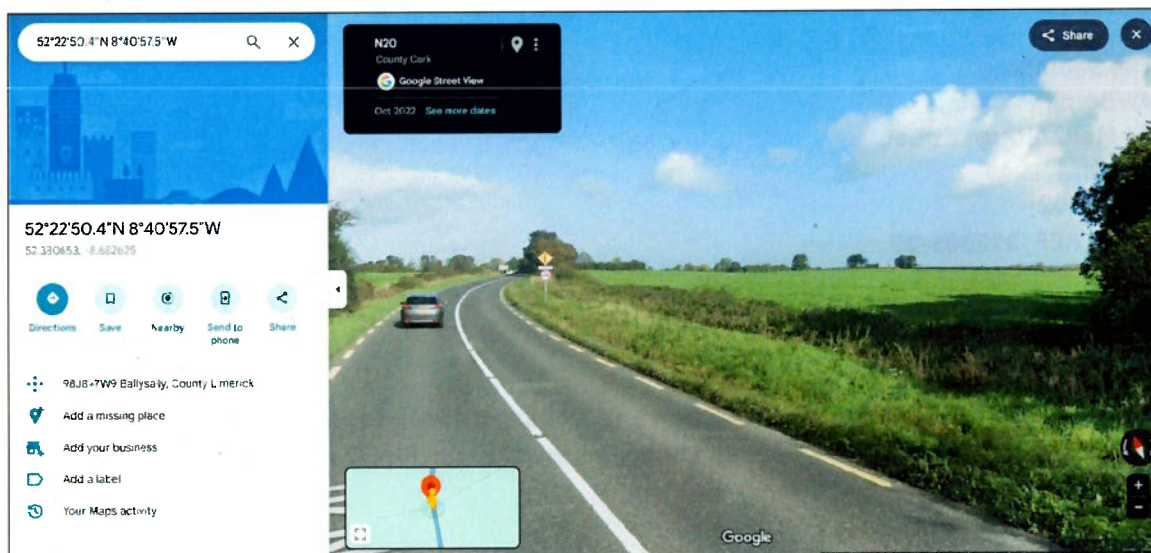


Figure 1: N20 from Charleville taken from Google Maps (screenshot August 2025)



Figure2: VP7A

- **Directive 2001/ 42/EC European Parliament (also known as the SEA) Directive**

Wind farm developments in Ireland under Directive 2001/42/EC, require that assessment of the effects of certain plans and programmes on the environment – meaning they require that an environmental assessment - is carried out where there are likely significant effects on the environment.

Wind Energy Guidelines meet the definitions of plans and programmes and are subject to SEA (Strategic Environmental Assessment) under the directive. This should have required an SEA to be carried out when the 2006 current WEDG were being drafted, but this did not

happen. Therefore, as a result, the current Wind Energy Guidelines are not compliant with EU Law and the Board cannot rely on them to make their decisions.

European Court of Justice: Case C24/19

The Ruling

The European Court of Justice delivered a judgement on 25 June 2020 that the Belgian order and circular establishing rules for wind turbine development were considered "plans or programmes" within the meaning of the SEA Directive.

The Requirement:

Because they were "plans or programmes," these Belgian instruments were subject to the mandatory SEA Directive.

The Context:

The Belgian instruments set out provisions on shadow flicker, safety, and noise levels, which are the types of conditions that constitute the framework for future development consent of wind projects.

The Consequence:

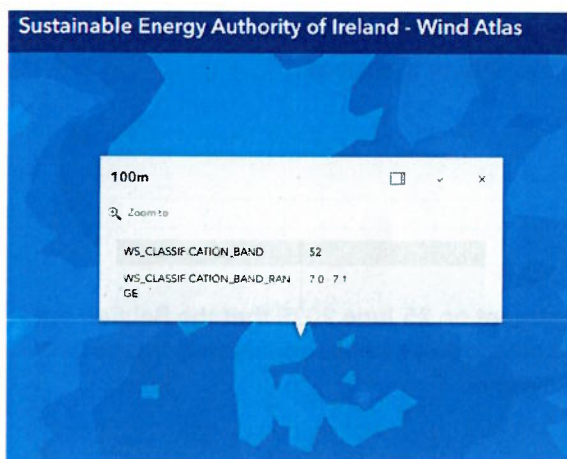
The ruling found that the instruments had not undergone the required environmental assessment and were therefore not compliant with EU law.

This ruling has implications for Ireland's 2006 Wind Energy Guidelines and suggests that Ireland's guidelines were not properly assessed for environmental impact, as required by the SEA Directive. No Wind Farm in Ireland should be assessed under the current 2006 Guidelines and all applications and decisions paused until a thorough SEA is performed on all impacts relating to Industrial Windfarms

- **SEAI Wind Atlas**

"The goal is to aid policy makers, local governments and community groups in the initial planning stages, we want to educate developers and the general public on Ireland's current wind resource environment". In the case of Limerick 2022-2028 Development Plan, WEI instructed the Limerick Executive not to use this map when determining their zoning map for locations for wind energy. When you refer to the map itself it shows Bruree, Effin and Charleville to be of very poor wind capability and using the SEAI Atlas for its intended use deems the area unsuitable for wind farm development (average wind speed 7.0-7.1 m/s -

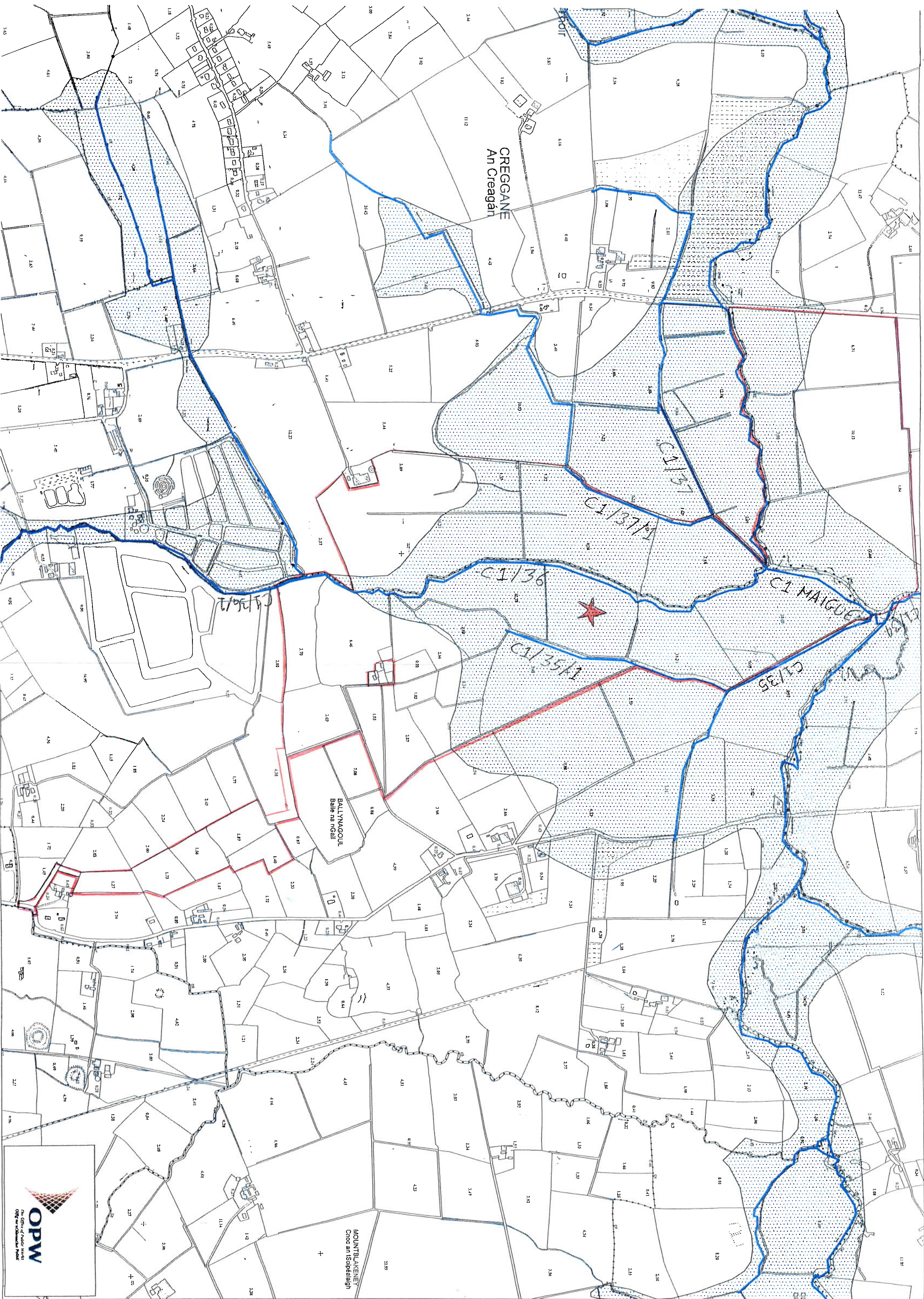
https://maps.seai.ie/apps/WindAtlas/#data_s=id%3AdataSource_1-1966294c46d-layer-1-49-5%3A21)



We strongly urge that this development be rejected for the reasons outlined above. To risk our rich agricultural lands in the Golden Vale for such an inappropriate, visually disorientating, environmentally destructive, and unlawful proposal would be an egregious mistake.

Regards

Marie-Clare Power and John Richmond.



CREGGANE
An Creagan

C1/37

C1/37/1

C1/36

C1/35/1

C1 MAIGUE

C1/35

BALLYNAGOL
Baile na nGaill

MOUNTLAVENEY
Cnoc an tSodhaigh