

28.10.2025

The Secretary
An Coimisiun Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Darren Maloney
Ballinlee,
Bruff,
Co. Limerick
V35 K500

Re: The proposed development known as Garrane Green Energy Project, for 9 no. wind turbines, grid connection and all associated site works located, in the townlands of Garrane, Ballynagoul, Creggane and Charleville, Co. Limerick.

An Coimisiún Pleanála - Case reference: PAX91.323635

Dear Sir/Madam,

I am writing to **formally object to** the Strategic Infrastructure Application (**case ref 323635**).
My objection is based on the following specific planning grounds of observation:

- Ground 1: The Application documents lodged are incomplete, and therefore the application should not have passed a completeness check.
- Ground 2: The Application has not been designed in accordance with National Wind Energy guidelines compatible with The European Union Strategic Environmental Assessment (SEA) Directive (2001/42/EC), as none currently exist.
- Ground 3: The application does not comply with the requirements of the European Landscape Convention of the Council of Europe (Florence Convention).
- Ground 4: The application design does not comply with design requirements contained within the available Draft Wind Energy Development Guidelines from 2019, or within the non-compatible Irish Wind Energy Development Guidelines from 2006.
- Ground 5: Cumulative effects – Visuals.
- Ground 6: Cumulative effects - Environmental.
- Ground 7: Limerick County Council Development Plan contravention.
- Ground 8: Project splitting.
- Ground 9: Unenforceable Conditions and mitigation measures within the EIAR.

I have explained these Grounds in further detail below.

The development, in its current form, is not in the public interest and is contrary to the objectives of appropriate sustainable development included within Local, National and European policy, planning and environmental legislation.

I would respectfully suggest these grounds require An Coimisiun Pleanála to refuse permission for this proposal.

Your Sincerely,

Darren Maloney
C.Build E FCABE MCIAT

Ground 1: The Application documents lodged are incomplete, and therefore the application should not have passed a completeness check.

The Application documents are incomplete and therefore the application should not have passed a completeness check.

Section 7 of the application form has been filled out incorrectly.

The application documentation clearly states the name of the Applicant as 'Garrane Green Energy Limited,' and the Planning and Development Act is clear on the requirement for the establishment of "sufficient interest" in the land by the 'Applicant' to make an application.

The applicant 'Garrane Green Energy Limited' has not provided landowner consents or otherwise agreements as required under the Act, for the following folio numbers,

- 12883 County Limerick,
- 7677 County Limerick,
- Land registry Title plans 7690_1, 7690
- 7663 & 22156F (and does not mention who the agreement is between),

Agreements have instead been submitted between the Landholders and a company called 'Greensource Limited,' however 'Greensource Limited' **is not** the applicant of the Proposed Development.

Alternatively, if it were the Applicant, then the Application form, documents, reports, multiple statutory public notices etc referring to 'Garrane Green Energy Limited' would be incorrect.

The consents provided between landholders and the Applicant, 'Garrane Green Energy Limited,' are for folio numbers,

- 24440F County Limerick, John Banks,
- 24439F County Limerick, Michael Herlihy & Elizabeth Herlihy,

Therefore, as the application lodged is incomplete, it should be refused.

Ground 2: The Application has not been designed in accordance with National Wind Energy guidelines compatible with The European Union Strategic Environmental Assessment (SEA) Directive (2001/42/EC), as none currently exist.

There are currently no National wind energy guidelines in Ireland compatible with European law, The European Union Strategic Environmental Assessment (SEA) Directive (2001/42/EC).

**Refer to European Court of Justice (ECJ) ruling case C-24/19, Directive 2001/42/EC, and the relevant article of the Aarhus Convention.*

The Applicant of this proposal 'Garrane Green Energy', refers to Irish Wind Energy Development Guidelines from 2006, however these documents were not subject to a Strategic Environmental Assessment (SEA) when published, and therefore do not comply with European law requiring it. There are Draft Wind Energy Development Guidelines from 2019, which reflect current wind energy technology and knowledge, which do have an SEA.

SEA is required to be carried out in order to comply with the provisions of the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (SI No. 435 of 2004) as amended.

SEA Directive and its transposition into Irish Law Directive 2001/42/EC of the European Parliament and of the Council of Ministers, of 27th June 2001, on the Assessment of the Effects of Certain Plans and Programmes on the Environment, referred to hereafter as the SEA Directive, introduced the requirement that SEA be carried out on plans and programmes which are prepared for a number of sectors, including energy.

The SEA Directive was transposed into Irish Law through the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (Statutory Instrument Number (SI No. 435 of 2004) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004). Both sets of Regulations became operational on 21st July 2004. The Regulations have been amended by the European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011 (SI No. 200 of 2011) and the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011 (SI No. 201 of 2011).

Environmental assessment is a procedure that ensures that the environmental implications of decisions are taken into account before such decisions are made. Environmental Impact Assessment, or EIA, is generally used for describing the process of environmental assessment for individual projects, **while Strategic Environmental Assessment** or SEA is the term which has been given to the environmental assessment of plans and programmes, which help determine the nature and location of individual projects taking place.

SEA is a systematic process of predicting and evaluating the likely significant environmental effects of implementing a proposed plan or programme, in order to ensure that these effects are adequately addressed at the earliest appropriate stages of decision-making in tandem with economic, social, and other considerations.

Therefore, this application has not been designed in accordance with EU compatible National Wind Energy development guidelines and should be refused.

Ground 3: The application does not comply with the requirements of the European Landscape Convention of the Council of Europe (Florence Convention).

The European Landscape Convention of the Council of Europe was adopted by the Committee of Ministers of the Council of Europe on 19 July 2000 in Strasbourg and opened for signature of the Member States of the Organisation in Florence (Italy) on 20 October 2000. It aims to promote European landscape protection, management and planning and to organise European co-operation. The Convention came into force on 1 March 2004. Ireland integrated the European Landscape Convention (ELC) into its legal system through the Planning and Development Act 2010. The ELC, which came into effect in Ireland in 2004, obliges the country to implement policies for the protection, management, and planning of its entire territory, with the National Landscape Strategy serving as the primary policy framework.

The European Landscape Convention (ELC) obliges Ireland to implement policy changes and objectives concerning the management, protection and planning of the landscape.

The National Landscape Strategy for Ireland 2015-2025 was intended to establish principles for protecting and enhancing the landscape while positively managing its change. A key aspect of the National Landscape Strategy was the proposal to produce a National Landscape Character Assessment (NLCA), which would assist with providing a common language and process for preparing landscape character assessments at the county level.

The National Landscape Strategy for Ireland 2015-2025 expired in 2025. Separately, there is currently no National Landscape Character Map.

The European Landscape Convention, defines landscape as "an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors". The ELC's objectives include protecting and managing high-quality landscapes. The Convention is based on the assumption that landscape is a key element of individual and social well-being everywhere, an essential component of human beings' surroundings and an important part of their quality of life. It thus helps to strengthen the link between human rights and the environment with a view to their mutual protection and enhancement.

This proposal will impact the ELC objectives negatively and has the potential to impact on a historically significant and agriculturally iconic landscape, and its conservation for future generations, as it threatens the landscape's unique cultural, historical, and natural qualities.

Visual impact, dominance, and cumulative effect: In the absence of National Territory Mapping as required by REDIII, numerous inappropriately designed, randomly located, large-scale industrial wind turbine parks, would negatively impact the visual and cultural heritage of the Golden Vale. They would disrupt the visual integrity of an area known for its open, rolling green fields and increase the visual complexity and clutter.

Proposed turbines would be the tallest structures in a low-lying landscape and become the dominant visual feature over a large area, sometimes visible from 20 to 30 kilometres away.

Cultural and historical impact: The Golden Vale is a significant cultural and historical landscape, and this proposal would begin to change this character, diminishing its cultural value. It is known for its fertile lowlands, intensive dairy farming, and panoramic views towards the surrounding Mountains. This development in combination with future developments would introduce large, industrial-scale turbines that could be viewed as dominating the pastoral, open character of the valley.

Lack of appropriate mitigation: The ELC requires projects to demonstrate how they are appropriate to the features of a place. No amount of mitigation could make a wind farm of this proposed height and scale compatible with the Golden Vale's distinct landscape characteristics.

Impact on sense of place and identity: The ELC recognizes landscape as a foundation of identity. The Golden Vale's character is a significant part of the regional and local identity. This and other wind farm proposals could fundamentally alter this sense of place by introducing industrial structures into a historic, agrarian setting.

Human-induced landscape: The ELC recognizes the role of both natural and human factors in shaping landscapes, and a windfarm is a significant human intervention with large mechanical moving elements that would alter the very character of the landscape.

Conservation for future generations: It is importance we preserve the Golden Vale's unique qualities for future generations, as mandated by the convention.

Balancing policy objectives: The ELC promotes landscape protection but acknowledges that landscapes are dynamic and change is a part of their evolution. However, Ireland's national renewable energy targets do not override the landscape protections mandated by the ELC. Ireland's planning decisions must align with the ELC.

This proposal will in combination with other proposals, contradict the ELC's principles of landscape protection and conservation, specifically concerning high-quality and culturally significant landscapes. The highly prominent nature of the wind turbines proposed and their high level of visibility over such an expansive area, including scenic viewpoints, would constitute a highly visually obtrusive development at an inappropriate location that would unacceptably interfere with the character of the area.

Therefore, the proposed development would be contrary to The European Landscape Convention of the Council of Europe, and the proper planning and sustainable development of the area and should be refused.

Ground 4: The application design does not comply with design requirements contained within the available Draft Wind Energy Development Guidelines from 2019, or within the non-compatible Irish Wind Energy Development Guidelines from 2006.

The proposed design does not comply with numerous aspects of the available Draft Wind Energy Guidelines (under both the draft guidelines and the incompatible with EU law guidelines from 2006).

For instance and not limited to; under the Environmental section and Wind take, many of the Turbines do not comply and have not been located a distance of two rotor blades from adjoining property boundaries, under the Aesthetic section the spatial extent and scale of the development is incorrect for the setting (too limited on such a panoramic setting) and under the Cumulative effect it is obviously non-compliant (as set out in detail under Cumulative effect grounds below).

Therefore, as the proposed development design does not comply with various aspects of any draft guidelines currently available, and in advance of national guidelines compatible with European law, it should be refused.

Ground 5: Cumulative effects – Visuals.

I would like to bring your attention to a separate application lodged with **An Coimisiun Pleanála S.I.D. Planning Ref number: 323780** (SID Planning Application by **Ballinlee Green Energy Ltd**).

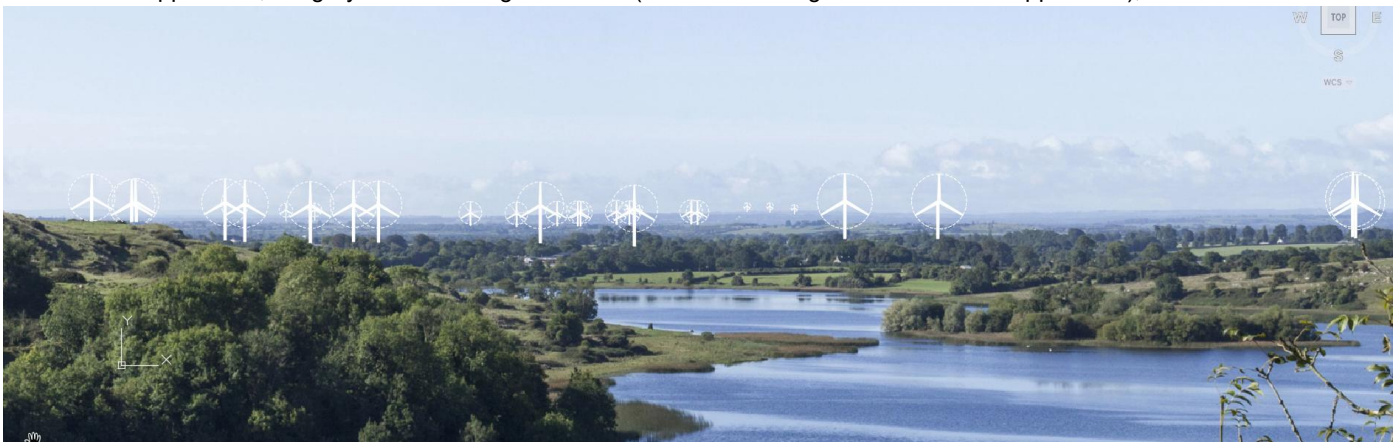
As per application documents this other SID application is within 9km of the application site. Significantly to note, the applicant companies involved for Garrane SID and Ballinlee SID applications, at present, claim to be subsidiaries of Greensource Sustainable Developments Limited (Greensource Ltd.).

In the absence of national guidance compatible with EU law, I would also like to draw your attention to the Draft Revised Wind Energy Development Guidelines 2019 published by the Irish government for public consultation, which had an SEA (or even the twenty year old guidelines from 2006 which are incompatible with European Law), and the detailed aesthetic considerations and spatial strategies explained in detail as required within each for the design of windfarms. These guidelines are especially important to be considered where wind turbines developments are now being proposed at numerous, random and limited scale locations, and with turbine heights and spacings varying within and between developments, and with considerable detrimental in combination effects being created contrary to the proposed (or incompatible 2006) guidelines.

Nowhere do the guidelines suggest the below cumulative scenario is acceptable, which shows the proposed locations and size of the Garrane wind turbines from this application, and the proposed turbines in front of these from the Ballinlee Windfarm proposal, when viewed from lough Gur.



Garrane SID application, imagery from the Lough Gur area (however missing the Ballinlee SID application),



Cumulative effect - Garrane proposal in the rear ground, and the Ballinlee proposal in the foreground, views from the Lough Gur National Heritage Park Public viewing area.

Furthermore, nowhere do the guidelines suggest the below cumulative scenario is acceptable, which shows the Garrane proposal on the left below, and the Ballinlee proposal on the right below, when viewed from the Ballyhoura Public Mountain biking and Trails.



Garrane SID application, imagery from the Ballyhoura area (however missing the Ballinlee SID application).



Cumulative effect - Garrane proposal on the left, and the Ballinlee proposal on the right, from Ballyhoura Public Mountain biking and Trails area.

As per screengrab below from the Coillte website, the Ballyhoura mountain bike trail centre is the largest in Ireland, and with an array of walks and “gorgeous views” ...and is a significant tourist destination.



Mountain Biking Archives

The largest mountain bike trail network in Ireland, with an array of walks, gorgeous views, hidden glens and little waterfalls. Loads to do for a weekend.



For further context, the application is located within the Golden Vale (photo above from Ballyhoura Mountain bike trails), which is the historic name given to an area of rolling pastureland in the province of Munster in southwestern Ireland. The area covers parts of three counties: Cork, Limerick, and Tipperary. This is a significant area of landscape character and history and renowned as the best land in Ireland for dairy farming.

Faillte Ireland promotes the Golden Vale as part of its “Ireland's Ancient East” and historic heartlands tourism region, highlighting its picturesque landscapes, historic sites, and local produce.

The only available draft guidelines **do not** suggest it is acceptable, to locate multiple industrial wind turbine parks, ill considered, randomly placed, randomly spaced, and randomly sized within such historic landscapes.

Inadequate assessment of impact: The Environmental Impact Assessment (EIA) for the project failed to adequately assess the cumulative landscape impact of the proposed turbines combined with other existing or approved developments in the area.

Therefore, as the proposed Design does not comply with draft design guidelines, has significant negative environmental effects, and is inappropriate from a planning perspective, it should be refused.

Ground 6: Cumulative effects -Environmental.

I would like to bring your attention to a separate application lodged with **An Coimisiun Pleanála S.I.D. Planning Ref number: 323780** (SID Planning Application by **Ballinlee Green Energy Ltd**).

As per application documents this other SID application is within 9km of the application site, and both are hydrologically linked and also both hydrologically linked to the lower Shannon SAC. Significantly to note, the applicant companies involved for Garrane SID and Ballinlee SID applications, at present, claim to be subsidiaries of Greensource Sustainable Developments Limited (Greensource Ltd.).

Therefore, both SID applications should be considered together, as any failed hydrological environmental pollution 'mitigation' measure in either, will likely adversely affect the other, along with affecting the Lower Shannon SAC.

Also, considering climate change or simply local adverse wet weather events affecting both SIDs at the same time, and with proposals being proposed on floodplains in proximity to OPW drainage schemes, any adverse flooding or failure affecting one of the proposed developments, will likely adversely affect the other, especially where either development causes an increase in water volume at the area of confluence of the river systems. The change in permeability and run off rates of the proposed sites could also exacerbate this.

'Mitigation' itself only means reducing the severity or seriousness off the risk, it does not mean elimination of the risk. Only where design is altered to such an extent the residual risk has been removed can the risk be 'eliminated.' This needs to be understood, carefully, especially if any individual designer or planning assessor were to make a statement suggesting a particular mitigation measure will eliminate any particular risk over the future lifespan of the project and the development were to proceed on that basis. Liability could likely attach.

This is an important consideration given the numerous mitigation measures being suggested to date, even in advance of all outstanding permits, requests from prescribed bodies, conditions attaching to statutory applications, completion of detail design, and without an understanding of the sequence and interactions between all.

Therefore, as the cumulative environmental effects have not been fully considered, and mitigation cannot eliminate risk to the lower Shannon SAC, the application should be refused.

Ground 7: Limerick County Council Development Plan contravention.

The application as designed is in direct contravention to numerous aspects of the Limerick Development Plan 2022-2028.

The proposed development at this location would be contrary to various policy provisions and objectives including but not limited to;

- Policy EH P8 Landscape Character Areas: It is a policy of the Council to promote the distinctiveness and where necessary safeguard the sensitivity of Limerick's landscape types, through the landscape characterisation process in accordance with the Draft Guidelines for Landscape and Landscape Assessment (2000) as issued by the Department of Environment and Local Government, in accordance with the European Landscape Convention (Florence Convention) and with A National Landscape Strategy for Ireland – 2015-2025.
- LCA O5 Lough Gur. Lough Gur is one of the most significant archaeological sites in Limerick. Topographically it is made up of a series of rolling hills surrounding the lake, which is the centre point of the area. The landscape is pastoral with a long history of human habitation. The presence of a wide variety of archaeological monuments is one of the characteristic features of the area. The area around Lough Gur, with its pleasant rural setting and views of the lake and its well developed hedgerows, is also an attractive amenity and is widely used by locals and visitors alike. a) Safeguard the visual amenity of the area and to have regard to the views and prospects in **and out** of Lough Gur.
- Policy EH P4 Compliance with Limerick's Heritage Plan It is a policy of the Council to place ecological and environmental issues at the centre of planning policies and decisions and in doing so, will adhere to the objectives set out in Limerick's Heritage Plan 2017-2030.
- Policy EH P7 Environmental Noise well-being of Limerick's resources. The World Health Organisation Air Quality Guidelines will be the basis for the air quality guidance in Limerick. It is a policy of the Council to proactively manage environmental noise, where it may have a significant adverse impact on the health and quality of life of communities in Limerick and to support the aims of the Environmental Noise Regulations, through the development and implementation of Noise Action Plans.
- Objective EH O32 Historical Landscapes It is an objective of the Council to, during the lifetime of the Plan, develop an historical landscape assessment process, which will identify key historical landscapes within Limerick.
- Objective EH O48 Assessment and Recognition of Archaeological Landscapes It is an objective of the Council to designate archaeological landscapes as part of an ongoing appraisal for Historic Landscape Characterisation of Limerick.
- Objective EH O1 Designated Sites and Habitats Directive It is an objective of the Council to ensure that projects/plans likely to have significant effects on European Sites (either individually or in combination with other plans or projects) are subject to an appropriate assessment and will not be permitted under the Plan unless they comply with Article 6 of the Habitats Directive.
- Objective EH O2 Lesser Horseshoe Bat It is an objective of the Council to require all developments in areas where there may be Lesser Horseshoe Bats, to submit an ecological assessment of the effects of the

development on the species. The assessment shall include mitigation measures to ensure that feeding, roosting or hibernation sites for the species are maintained. The assessment shall also include measures to ensure that landscape features are retained and that the development itself will not cause a barrier or deterrent effect on the species.

- Objective IN O1 Climate Action in Infrastructure Planning It is an objective of the Council to: a) Require all infrastructure development, whether above ground or subterranean, to avoid flood risk areas and areas at risk of coastal erosion.
- Objective CAF O29 Wind Energy Development and Environmental Considerations It is an objective of the Council to facilitate the development of wind energy in an environmentally sustainable manner, ensuring proposals are consistent with the landscape character objectives of the Plan, the protection of the natural and built environment and the visual and residential amenities of the area.
- Objective ECON O36 Agricultural Developments
- Objective ECON O37 Farm Diversification I
- Policy EH P1 Protection of Natural Heritage and Biodiversity
- Policy EH P2 Sustainable Management and Conservation
- Policy EH P3 Climate Action and the Natural Environment
- Policy EH P6 Water and Air Quality
- Objective EH O5 New Infrastructure Projects I
- Objective EH O10 Trees and Hedgerows
- Objective EH O15 Ground Water, Surface Water Protection and River Basin Management Plans
- Objective EH O17 Water Quality
- Objective EH O18 Riparian Buffers
- Objective EH O22 Commercial and Industrial Noise
- Objective EH O31 Views and Prospects

To note, there is currently NO national territory map available for renewable electricity in Ireland, as required by the Renewable Electricity Directive 2023/2413 (REDIII). The Directive required a map be prepared by 21st May 2025. The Wind map within the current Limerick Development plan is unsuitable for use as same, as it does not meet the Regional, National or European legislative requirements for same.

The Department recently undertook a public consultation ***'Public Consultation on National Territory Mapping for Renewable Electricity'*** (2 September 2025).

An answer on the Dail record from The Minister for Climate, Energy and the Environment, dated Monday 8th September 2025, sets out the work underway by the Accelerating Renewable Electricity Taskforce to ensure compliance with the requirements of the Renewable Electricity Directive 2023/2413 (REDIII).

On Wednesday 3rd September 2025, DCEE launched non-statutory Public Consultation on the national territory mapping, running until Friday 10th October 2025. This non-statutory public consultation aims to take into account the views of the public, in the inclusion of areas already designated for renewable energy generation in existing plans for the purposes of the mapping exercise required under Article 15b of REDIII.

The purpose of the Public Consultation is also to invite any key considerations from the public, in preparing a draft plan for the designation of at least one Renewable Acceleration Area, as required under Article 15c of REDIII, noting that any area must be a "sub-set" of the areas identified in the "national territory mapping" exercise.

Further information on this Public Consultation is available on my Department's website.

Following the completion of Article 15b compliance requirements to the European Commission, the process for designating at least one RAA will be undertaken, including further public consultation, which is a specific requirement of Article 15d of the Directive.

Please refer to and consider, the Heritage Council report, ***'The Onshore Wind Farm Sector In Ireland' Planning In Harmony With Heritage***, Policy Research Paper | Volume 1 | Final Report. October 2013, and the summary within same; ***4.4 Republic of Ireland - Summary***

In summary, Ireland's existing planning legislation and policy framework in relation to onshore wind farm development requires updating on many levels, e.g. cumulative impact assessment, to ensure that the planning system is fit for purpose and that it accords with various EU Directives and international conventions including, the European Landscape Convention and the UNECE Aarhus Convention. Ireland's planning system would be substantially strengthened by the formulation of a National Planning Policy and robust and non-static Section 28 Guidelines relating to landscape character,

landscape capacity and landscape management, to assist and inform relevant government departments, Regional and Local Authorities, state agencies and wind farm developers and operators.

Please refer to and consider the below extract from the **‘STRATEGIC ENVIRONMENTAL ASSESSMENT SCREENING REPORT’** Limerick City and County Local Economic and Community Plan 2023-2028 Prepared for Limerick City and County Council under SI 435 of 2004 as amended September 2024, Page 24, Interrelationships between the environmental factors,

.... There are more immediate environmental threats to the environment than climate change. Many of the activities regulated by planning legislation have the potential to cause environmental and ecological damage if carried out inappropriately, or at the wrong scale or location. The Development Management Chapter is perhaps one of the most important parts of the Plan in dealing with these issues.

Therefore, as the application is in contravention of numerous Local Authority Development plans policies and objectives, and cannot be assessed against documents and maps compliant with relevant European Directives and as required under the REDIII directive, it should be refused.

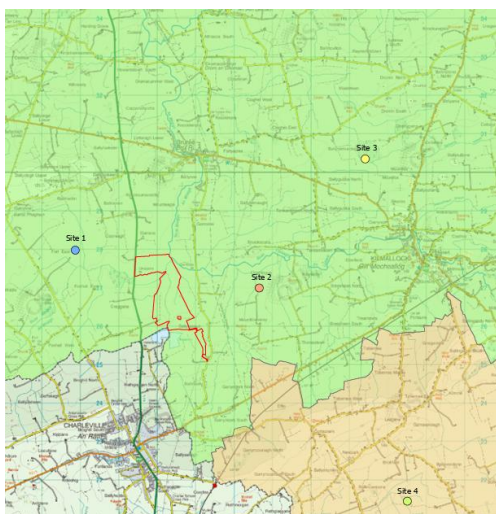
Ground 8: Project splitting

I would like to bring your attention to a separate application lodged with **An Coimisiun Pleanála S.I.D. Planning Ref number: 323780** (SID Planning Application by **Ballinlee Green Energy Ltd**).

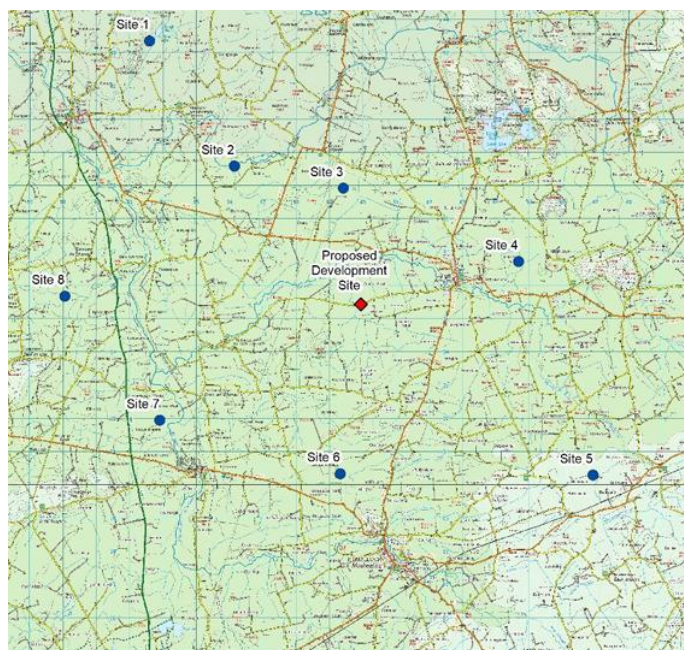
As per application documents this other SID application is within 9km of the application site. Significantly to note, the applicant companies involved for Garrane SID and Ballinlee SID applications, at present, claim to be subsidiaries of Greensource Sustainable Developments Limited (Greensource Ltd.).

As regards the EIAR and alternative locations, Garrane SID EIAR alternative site no.3 near Kilmallock, and the Ballinlee SID EIAR alternative site no.6 near Kilmallock, are the same site.

To note Garrane Green Energy Limited (May 2023) and Ballinlee Green Energy Limited (August 2024) only came into existence ‘after’ the dates of various stated surveys within each application. Field survey date for Garrane SID application indicate field survey visits in 2022. Field Surveys for Ballinlee SID application indicates dates from October 2021. This and other information within the various application documentation suggests a separate company or third party, had already identified the preferred Garrane site by the survey dates and this company could not have been the applicant ‘Garrane Green Energy’, as the applicant did not exist at the time. The Ballinlee SID has the same issue.



Garrane SID alternative sites map shown above



Ballinlee SID alternative sites map shown above.

This suggests these projects may have been linked and known to each other, and both applications had alternative locations, i.e., the other development. This and all sites reviewed for both applications should have been included in the same EIAR, especially if considered at the same time by a third party. The wider area is the same for both Applications as are the timelines involved. And to note there is another proposal moving through the Limerick local authority planning process at present, Ballynisky Green Energy (also a claimed Greensource subsidiary), so further alternatives exist within County Limerick.

The wider context should also be considered in the 'alternatives' and the 'do nothing scenario' of the EIAR, due to the existing Windfarms on more appropriate higher ground locations, surrounding the Golden Vale areas involved. There are also numerous further Windfarms proposed on the surrounding hills, including the 66no Turbines across multiple proposals across various Clare hills (including Greensource subsidiary Ballycar Green Energy), hills seen clearly from within the Golden vale on any fine day.

Therefore, as Project splitting is not allowed, the application should be refused.

Ground 9: Unenforceable Conditions and mitigation measures within the EIAR.

Considering the limited experience of the applicant company (setup in May 2023), the proposed lifespan of this development, the numerous serious mitigation measures proposed within the application, and the likely numerous serious conditions required to be attached to any grant of permission for such an SID, it is highly unlikely the required safeguards and conditions will be enforceable for the proposed project duration.

Public records suggest the Applicant company only exists since May 2023, and at present there are multiple companies all with the same phone number and address as the Applicant (screengrabs of some below).

This does not build community trust or confidence that commitments being made now regarding 'mitigation' measures to ensure human, animal, species or bio-diversity health for the next 35 years, will be achievable or enforceable, or even which company will be liable for ensuring same. This could suggest numerous companies are being set up to limit liability for ensuring same.

Community engagement, is critical to the success of any SID project proposal, and knowing who is responsible and liable for all stages of design, construction and planned future operation of the development is key.

For the above reasons, this application is not appropriate or in the Public Interest and should be refused.

