From

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Ballinagoul

Kilmallock

Co Limerick

V35TY28

To

The secretary

An Coimisiun Pleanala

64, Marlborough street

Dublin 1, D01V902

Submission on the proposed Garrane Green Energy project

Re Garrane Green Energy wind farm located in the townlands of Garrane, Ballynagoul and Creggane, Co Limerick.

reference no: 323635

date 26/10/2025

To whom it may concern,

We are writing to you to formally express our strong objection to the proposed Garrane Green Energy project wind Farm development located in the townlands of Garrane, Creggane, Ballynagoul Co Limerick which is currently under consideration by An Coimisiun Pleanala, as a resident and homeowner, we are deeply concerned about the potential impact this development would have on our family and the local community living in this area and the sustainability development of the area.

This submission outlines deficiencies in the Environmental impact assessment report (EIAR) submitted by Garrane Green Energy project especially in the inadequate assessment of construction phase noise, construction traffic, human health, shadow flicker, operation noise, communication from Garrane Green Energy and the impact on our very small community.

Communication

We found that the communication of the project to the local resident by Garrane Green Energy group has not followed the best practice guidelines for the Irish wind energy industry under the wind energy development guidelines (2006) and the draft revised guidelines (2019) which require early & open consultation with communities affected by wind energy developments

After receiving a letter on April 2025 in which the letter mentioned that the Garrane Green Energy project will be in the townland of Garrane Co Limerick, Helen was born is this area and lived a great part of her life in this area and has never heard of a townland of Garrane (we know now that there is only 2 properties in that townland and is a very small part of the land in the area), this was very misleading due to the fact that most of the project is in the townland of Creggane and Ballynagoul as well as Garrousse, but I supposed if these townland names were used from the start the local people would have known about the whole project. With that first letter a flyer was given, it mentioned that the project was only in phase 1 community engagement, we haven't seen anyone coming to our house to talk to us about this project, Garrane Green Energy said that the people living near the substation have been notified (our house is only 350 meter away from the substation and we haven't received any notification re the substation been so close to us, or seen anyone or heard anything about this project since April 2025 until mid-august the Bruree Charleville Effin wind farm action group was formed and a letter from Garrane Green Energy arrive in by post saying that a planning application will be made to An Coimisiun Pleanala to our surprised because we were still thinking that the project was still in the communication stage. It is only then by joining the action group that we realised the size of the project, that this project started since 2021, but nobody locally realised that this was happening.

This is to us a very clear underhanded approach from Garrane Green Energy project to make sure there is a little as possible objection from the locality to the project and very little time for us to oppose the project in form of submission as it only left us with only few weeks to prepare a submission in comparison of Garrane Green Energy and all their expertise and time behind this project.

When the Bruree Charleville Effin action group was formed we did door to door calls to inform all people living in the locality in a 2 km radius from the wind farm project, we found out some people like us only received one letter in April 2025 and others did not receive any information at all especially the people living outside a 1km radius.

We are part of the Garrienderk Parish, there is a community WhatsApp group in this community, when the words started to spread about this project, few people started to express their concern re this project and the effects it will have on them, but one person said and I quote "it is near no one in the middle of nowhere", as it happened that same person is as we know now involved with the Garrane Green Energy project as a landowner to have given authorisation to use a part of land for the project, when calling to her door as part of our communication for the action group she then told us "yes" she knew about this project a while now, she is in constant communication with representatives from Garrane Green Energy wind Farm and they are very nice. The land of the site entrance number 2 is owned by another neighbour in our community and himself again kept this as a secret to everyone around. This is hard to believe that our neighbours could keep news of a project that will change lives of a whole community in the quiet for months, what were they were told or promise by Garrane Green Energy for her silence, it makes you wonder?

No public meeting was held, no communication was giving to us re public clinic that apparently were held on a very limited numbers, Garrane Green Energy declined the invitation of a public meeting held in the local village of Bruree by the Bruree Charleville Effin wind Farm Action Group.

This is our views that Garrane Green Energy project has not followed guidelines re community communication and engagement.

How can a project that big can go from 1 letter in April 2025 to a planning application to An Coimisiun Pleanala in few months which gave the residents of this community only a few weeks to engage and submit our own submission to you while Garrane Green Energy Group kept everything quiet.

Shadow flicker

Re shadow flicker in Volume 2 main EIAR chapter 14 under the section 14.2.4 baseline description they have a table 14.2 sensitive receptors in the study area, all receptors (houses) have a number, to find out which house numbers is the one corresponding to our house you have to go to the map that is posted in volume 3 figures under EIAR chapter 1 figures photo 3, this wasn't an easy find. The number corresponding to our house and its occupant is "H17" closest to turbine 1, 957 meter according to their measurement.

In the chapter 14.2.1 assessment methodology they mentioned "shadow flicker may have the potential to cause disturbance and annoyance to residents if it affects occupied rooms of a house," what about living and passing time outside of our house in the garden, if shadow flicker occurs, we then cannot stay in or out of our house, what quality of life that left us with during these times.

To find out how much shadow flicker will occur on our house and outdoor living space you must find the table 14.4 summary of worst daily and annual shadow flicker levels and exceedance.

The result for our house H17 is 00.40 hours /day which exceed the 2006 WEDGS by 10 minutes and an annual 08hours and 14 minutes of expected shadow flicker.

To get a more accurate reading of these numbers you then must go Appendices of the EIAR and in appendix 14.1 shadow flicker analyses.

When you try to get a better understanding of the calculation from the program used for the assumption for shadow calculation, you then realised that our house ref H17 previously is now a different reference, to find out exactly which number was not easy but after a bit of research and using easting and northing ITM our house for theses calculation is reference as Q17.

Under this calculation we found out that our house and surrounding could have the potential of shadow flicker from the 14/05 to 30/07 each year, every evening until a peak of potentially 40 minutes in the evening of shadow flicker.

They say that shadow flicker will only happened if the weather is sunny, and there is enough wind energy to ensure that the turbine blade are moving, so due to our location and the results above during the summer months when the weather has the potential to be the most sunny with a bit of a breeze our quality of lives will be changed due to shadow flicker, we might not be able to stay indoor or outdoor enjoying the nice few evenings, having friends around or just enjoying gardening or our outdoor living space, or human health will be seriously undermined and could have the potential of long term damages.

Under the paragraph 14.2.9.3 operational phase, they say that they will have shadow control systems install on each turbines to control shadow flicker, there is no review or assessment in Ireland available because they are custom installed solution by wind farm developers, so no data can be found if this solution stop shadow flicker happening, even if this system works how long will it take for the wind turbine to stop when shadow flicker occur, and if it is just a cloud passing will the turbine restart straight away and shadow flicker will happened again.

The turbines are so tall that when shadow flicker will occur to our house as show in their calculation it will affect the house across the road (L1537) number H18 or R18, this could cause vision trouble on the road for drivers and impact visibility and safe driving conditions.

• <u>Traffic, noises, and construction phase.</u>

We are very concerned about the noise levels of this project from different points such as noises coming from the construction, traffic, and the turbines when the project will be in operation phase.

Our house (H17 on the map in photo 3 in figures 1 chapter in the EIAR, is at around 500 meters away from the site entrance number 2 going towards Bruree village on the L 1537 road. What this means is that all construction traffic will be passing in front of our house from the site entrance 2 and according to Garrane Green Energy plan of traffic construction one way system from 6am to 20 pm for the 18 months construction project. The noises and vibration from all these heavy good vehicles will have an impact on our quality of living with noises and vibrations as well as excessive traffic on a small rural road where we enjoyed going for walk during our time off.

What is not talk about in their report re construction traffic and noises impact on our house is that if you look clearly at the map site entrance and the permanent access track build inside the site project for all traffic to go in and out of the site (map photo 2 in volume 3 figures name EIAR chapter 1 figures and joined in this letter), is that all traffic will be passing our house on the south as well, which mean we will have noises disturbances and vibration 3 times for every trucks and others vehicles (going in going out of the site and then passing our house on the north front on the L1537 going to Bruree village. Not once this has been communicated to us or the impact the project will have on us by any member of the Garrane Green Energy project team.

Furthermore, we cannot find any data re noises from construction impact on our house re the construction of the site 110kv substation and the 2-grid connection tower to the overhead line Charleville to killonan.

The Garrane Green Energy group have said that letters were send to each of receptors/houses within 500 meters of the 110kvsubstation, and according to the plan our house is within that distance (around 320 meter to be more specific) and is it with complete honesty that we never got any letters from them or any letter telling us that 2 connection tower will be less that 150 meters away from our house.

We are very worried as well about the amount of traffic that will be going through the road L 1537 which is a very small rural road with acute bends in some parts with poor vision of traffic coming in different direction. In some of the pictures in chapter 17 in the EIAR plate 17.2 page 21 of that chapter, plate 17.6 page 23 of the chapter you can see the road L1537. These 2 pictures are not accurate and miss represent the road.

The first picture is the only straight part of the road and is only 500/600 meters long and the second pictures does not represent two sharp bends at that location of the suppose site entrance 2, few cars have been found in the ditches in that location from both ways of the traffic.

As well as noise from traffic and construction of the project, during the operation phase of the project we will be subject of noise coming from the turbines (our house H17 is only 957 meters away from the first turbine).

These turbines have chronic low frequency noise exposure emission especially at night, evidence shows that wind turbine noise even in the regulatory limits disrupt sleep and causes stress related effects, so after 18 months of construction noises will be affected everyday of our live by noise from the turbines, these will affect once again our Human health.

We chose to live in a peaceful and quite part of the country to have a good quality of life only to be destroyed by a project that as no consideration to is local resident is harrowing.

Conclusion

For conclusion we are opposed to this project and would like An Coimisiun Pleanala to refuse this planning application by Garrane Green Energy group ref 323635 on all points highlighted above.

The sustainability development of the area will be seriously undermined; the locality will suffer in the long term. No one will want to come and live in this area and people will not be able to sell their property if they wish to do so or passing it on to their next generation, this will affect local businesses, schools, and many people quality of life as well as our own.

It shows that from the start with the lack of communication from the Garrane Green energy group and mistakes and lack of complete accurate data and information in some parts of the EIAR that we do not matter and to them an easy opportunity to imposed this project on a small community like ours, just to make money on our back door.

Regards

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