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

Proposed Project: Garrane Green Energy Wind Farm, in the townlands of Garrane, Ballynagoul, and Creggane, Co Limerick.

ACP Ref. No. 323635

28th October, 2025

Dear Secretary

AN COIMISIUN PLEANÁLA	
LDG-	083753-25
ACP-	
29 OCT 2025	
Fee: € 50	Type: cheque
Time: 9.15	By: post

Please see below our observations regarding the above proposed wind farm development. We have been residents in our home for almost 45 years. This is the life we chose to lead, raised our family and have been very happy in the community. It is quite disturbing that we and our community can be treated with such disrespect by the developers of this proposed/imposed development. It is equally disturbing that the state provides very little if any support in the face of such imposition on us and our community. Some of the political leaders' pronouncements re: the "common good" in respect of climate change represent efforts to paper over the crevice of not having a science based national plan. This in turn allows private sector developers to cherry pick lucrative developments which in the medium to longer term are certainly not in the interests of the "common good"

Garrane Green Energy (GGE)

Our first meeting with representatives of GGE was on 13/05/2025 when we received an unannounced visit from them. Normally the objective of what is essentially "cold calling" is to create a positive relationship between the homeowners and company representatives. If this was the objective of the unannounced visit it was an abject failure. If it was a 'tick boxing' exercise intended to meet ACP Community Engagement requirements for planning purposes the standard of requirements would have to be very

low for GGE to pass that test as they met just 13 out of 31 households. Given the importance to the community and the scale/potential impact of the proposed development, the motivation to carry out unannounced visits during work hours and the restrictive catchment area for such visits (in comparison SEAI's definition of stakeholder) must be questioned. A fuller analysis re: Community Engagement is available in the Bruree Charleville Effin group submission to An Coimisiun Pleanála (ACP).

The unannounced visit was very unsatisfactory on many fronts necessitating an email to GGE on 8/06/2025 (see attached). In summary, you will note that we expressed our concern that GGEs non-response to queries from that meeting would be *"a portent for our and possibly our community's relationship with Garrane Green Energy"*

Unfortunately, our experience in the intervening period turned that concern into reality. The most apt description we can have of GGEs poor effort at engaging with the community is "cavalier". While GGEs documents state *"As part of our community engagement process, we are committed to holding open and meaningful discussions with residents and interested parties. The feedback we receive will help shape and refine the project"*. Our experience however is a different world.

For example:

- We pointed out in the email (8/06/25) that pointing south to the skyline and saying the turbines will be "over there" did not provide any assurance especially as the actual turbine layout showed that turbines would be to the south and west of us.
- We were invited to and attended GGE's "clinic" on July 22nd, 2025. At the meeting GGE committed to forwarding further information to us as follows:
 - Location of each turbine and distance from our house
 - Access points off the N20 and L1537
 - Position of substation
 - Identify where bridges would be located, if possible, on the map
- GGEs response (July 29th) informed us of just the nearest and furthest turbine, not all turbines as they committed to. They posted a map showing a general location of the substation. They also informed us that final bridge locations were yet to be determined and a map showing the locations would be available on submission of the planning application. As there was some confusion regarding the distance the L1537 site entrance was from our home we requested details of same and received a similar response ie that a map showing the site entrance would be available on submission of the planning application.

How are we supposed to be able to provide feedback *"that will shape and refine the project"* when GGE will not provide information?

- The shadow flicker information provided by GGE is just based on the nearest turbine however we have turbines to our west and south. We need that information from GGE.
- It is of serious concern that shadow flicker on either, or both, the L1537 and the N20 has not been addressed.

TRAFFIC (GGE's EIAR, Chapter 17)

N20

GGE's EIAR, (Chapter 17, Section 17.2.6, p20,) describes the N20 as *"A 6.0m wide Type 3 single carriageway with hard shoulders and grass verges"*. This is incorrect – there is no hard shoulder on the N20 from just south of Croom as far as Charleville, a distance of 17kms. It is on this part of the road that Entrance 1 for the Turbine parts, etc is located.

This is an extremely dangerous road. On 14/1/2025 Minister Patrick O'Donovan described the N20 road as a *"glorified cattle track, it's not safe, it has numerous accidents and incidents on it every year"*. He also said *"There are some desperately dangerous junctions on it, like O'Rourke's Cross, Rock Hill.."*. Please note O'Rourke's Cross is an essential part of the Construction Haul Route, proposed by GGE.

The N/M20 Project Office show *"that the proportion of fatal collisions to all personal injury collisions on the N20 is four times higher than the national average. In addition the rate of personal injury collisions on the N20 is substantially higher than average, meaning drivers are more likely to be involved in a personal injury collision on the N20 than on other national roads in the country.... The N20 has undergone localised improvements over many years and as such has varying cross section and road geometry characteristics that would no longer be considered desirable under current design standards. These shortcomings present road users with increased risks due to inconsistent driving conditions, exacerbated by slow moving and right turning vehicles adding to inconsistent journey times and driver frustration"*.

It beggars belief that anyone would consider adding very significant volumes (almost 8,000 HGVs alone) of traffic to the roads as described above.

It also beggars belief that there could be the additional distractions of turbines and shadow flicker on such a dangerous road.

Charleville

An Bord Pleanála Senior Planning Inspector Report 6/01/2025 states *"...it is my opinion that the potential arises for significant effects to arise on the area of more than one*

planning authority as a result of impacts on factors such as traffic, visual and amenity considerations”.

Figure 17.4, p29 shows the proposed Construction Haul Route. Charleville town is a critical junction in GGE’s one-way circular traffic system for the delivery of all materials needed for the construction of the turbine bases, bridges, substation, 5kms in-site roadway, etc. GGE have identified potential suppliers to both the north and south of Charleville town. While in Section 17.2.10 p28 GGE provides details of the one-way system it does not mention the fact that HGV’s and other vehicles will have to travel through Charleville, an already gridlocked town.

Table 17.9 shows that 120 loads of concrete will be required for each turbine base. This will require a 14-hour day, meaning that a HGV containing concrete will travel into the town every seven minutes.

It is noteworthy that Appendix 17.1, Section 3.1 contradicts this stating that: *“During the concrete pours the wind farm development will generate a maximum of 165 HGV trips and 40 LGV trips on the public road network”.*

In February 2004 my (Sheila) uncle died after being knocked down by a HGV while crossing the main street in Charleville. Over the past 10 years 8 pedestrians were killed on this same street, including 2 people who died within three weeks of each other in 2023. This unfortunately shows that this long-term issue has never been properly addressed or remediated. It is generally accepted that a by-pass for the town or building the M20 is an urgent priority.

Charleville, however, is hardly mentioned in GGE’s traffic management. They have not highlighted that these extra HGV’s etc will have to pass through the town. For instance, in the Construction Haul Route Map (Figure 17.4, p29) the name of Charleville is so small it is practically illegible.

Road Junctions

There are 7 photographs of the different road junctions involved in the haul route but a photograph of the N20/R515 junction in Charleville has been excluded. This is a very tight, dangerous right-angle junction.

The layout of L1537/R518 another dangerous junction has recently been changed.

L1537

Site entrance 2 is on the L1537. This road runs from the R515 to Bruree village. The selected photo (Plate 17.2, p21) of this road shows a straight stretch of road. However, in reality the road is very narrow with eight right angled acute bends and many other dangerous bends. There are stretches where two cars cannot pass each other without one pulling in or reversing to the nearest gateway. Plate 17.6, p23, shows site entrance

2, which is on one of the acute bends mentioned above. The L1537 is plainly not suitable for volumes of large HGV's.

Similarly, on the R518 Bruree Bridge contains two right angled bends, which present significant dangers. Again, it is plainly not suitable for volumes of large HGV's.

Pedestrians

Section 17.3.5, p55, states "*Pedestrians and other vulnerable road users may be affected by the works at the project entrance, construction haul route...*" There is no "may". In reality it should be a definitive statement that pedestrians and other road users will be affected. We have shown above that all users of the construction haul route, i.e. N20, R515, L1537, and R518 and Charleville Town will be extremely affected.

Mitigation

In Chapter 17 GGE outline many proposed mitigation measures for the traffic on the local roads. Given our experience with GGE to-date why should we place any trust them?

It is hoped that the planning decision made in this case will not by any act or omission do anything that will increase the dangers to the people using the N20/Construction Haul Route, or people using the facilities of the town of Charleville.

NATIONAL/COUNTY PLAN

While we support green energy, the absence of a national plan based on science is a serious deficit in the provision of same. This deficit feeds into and further exacerbates the inconsistent approach within and across counties in respect to the identification of areas suitable for such developments. In this respect Limerick City and County development "plan" is out of kilter with other counties, leaving large areas of the county open to such proposals even though data may show low energy yield from the location. Such is the case in this GGE proposal. However financial incentives for developers may mean that these low energy wind farms are financially beneficial for the developers. It does not logically follow that they are good value for the consumer. Inefficiency costs, however in this situation it costs the consumer (upward pressure on price) not the developer. This can only be addressed by scientific/financial based analysis well before a spade is put in the ground.

In our local area there are proposals for this windfarm and a biomethane plant, while planning has been sought for wind farms in Coolcappa and Ballinlee Green Energy (including Bruff, Dromin, Athlacca, Ballinlee). It appears that individual proposals can

get approval without oversight of the combined impact they may have on a community, county or country.

In a parallel vein individual developers/companies may come to have an unhealthy dominance in the market. We were informed at our “clinic” meeting that GGE could sell on their interest when planning permission had been achieved.

The absence of a national plan and appropriate controls means that the Government is opting out and passing over responsibility for the development and supply of a vital national resource i.e. energy to the for-profit private sector. The developers while cherry picking these developments are in effect deciding when and where these developments take place. Should this be allowed to continue Ireland will become dependent on absentee landlords for our energy needs.

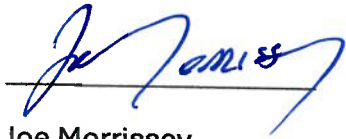
This approach is not for the common good. It may however be acceptable to many eg profit motivated developers & those endeavouring to overcome the absence of a science based national plan, while at the same time meeting Irelands targets re: climate change. The only ones shouldering this risk are local people and communities. This risk is to basic human rights/protections and entitlements to an acceptable quality of life, free from imposed health risks of noise, flicker etc. It is also essential that we as a nation maintain the independence and control of our vital energy supply. This is not an either/or situation it is a both/and situation. The Government and its agencies can both protect its citizens and maintain control over a vital national resource. While the absence of a national plan is a serious flaw - it can be rectified. Compounding that flaw by blindly following the “current path” of handing over the vital energy resource to potential absentee landlords would be careless in the extreme and not only not in the common good but also not in the national interest.

In Conclusion

GGE had more than ample time and opportunity to engage with all stakeholders in line with the requirements of the Aarhus Convention, the UN Convention on the Rights of Persons with Disabilities (UNCPRD), equality legislation etc together with the industries own principles and values. With specific reference to community engagement GGE chose to pursue a different path. This cavalier approach was/is the antithesis of fostering trust and an overall positive relationship with the community. It is very difficult to understand why or how GGE believe that this approach will be acceptable to ACP.

Cognisant of the above and other submissions/observations, plus the fact that GGE application is 1) based on poor science, 2) of no benefit to Irish consumers while simultaneously increasing the health and other risks to the community, we urge An Coimisiun Pleanala to reject the Garrane Green Energy planning application.

Signed



Joe Morrissey



Sheila Morrissey

Garrane Green Energy

From Joe Morrissey <j.s.morrissey@hotmail.com>

Date Sun 08/06/2025 12:40

To info@Garranegreenenergy.ie <info@Garranegreenenergy.ie>

FAO: Nadine Walsh

Dear Ms Walsh

We refer to recent communications from Garrane Green Energy, and discussions with us on 13th ult. From that discussion we were to be emailed information the following week. To date we have not received any communication and are concerned that this is the portent for our and possibly our community's relationship with Garrane Green Energy.

It would be extremely naive of us to believe that the primary motivation (as espoused in the glossy brochure etc) of this proposed development, is the provision of green energy and to provide community funding.

This is essentially a financial investment with potential for vast financial returns. The investors/developers may/may not be part of our community or have no past, present or future allegiance to us. Should the proposal go ahead they may potentially have moved to the next investment while we and the community may be left with the remnants of a development which in effect has been imposed on us.

This is the reason we believe that full, open, honest, transparent communication with us and the community is vital. If the investors/developers firmly believe in the benefits to us and the community etc then there should be no issue whatsoever in communicating this in whatever format the community requests.

It is essential that Garrane Green Energy respect the people/community and demonstrate this respect through the provision of full factual information on all aspects of the proposal. This will facilitate people both individually and collectively form an opinion on what is best for our community. All aspects including the history of the project, those involved, details of work to date, current and future plans need to be explained.

The glossy brochure informs us that *We are here at the Community Engagement stage*. We take it, therefore, that Garrane Energy must have a communication plan/strategy in place for communicating with individuals and the

community. However glossy brochures and unannounced visits alone do not in any shape or form represent good communication.

In fact, this fragmented approach creates more concerns and uncertainty. This in turn can lead to people questioning if their views matter at all to Garrane Energy or is this "communication" merely a "box ticking" exercise. Thorough, open and honest communication can help alleviate some of those concerns.

People hear and interpret information in different ways. By way of example, from your visit we understood that the proposed turbines would be 170 metres high. We learned, in conversation sometime later, that some turbines would be on a base two meters above the ground. We did not have the knowledge to ask that question and neither were we informed of same.

Similarly, pointing to the skyline and saying the turbines will be "over there" does not provide any assurance. If a car salesperson pointed to a forecourt full of cars saying "your car is over there" without providing details of the exact location of the car, its history, current state and future guarantees we doubt you would buy the car. This proposal is much more serious than that as it effects the lives of a cross section of our community from people/families that have lived here for generations and people who have been attracted to live in the community and invested heavily in same.

In summary a fragmented approach to the provision of information leads to misunderstandings, incomplete information etc, ultimately culminating in mistrust and many unhappy people. We take it in good faith that the above fragmented approach is not your communication strategy.

We would welcome therefore a prompt reply detailing your communication strategy, essentially how (with timelines) you will ensure that we receive full, clear, honest and consistent information.

As previously stated, the history of the proposal, those involved, details of work/progress to date, current and future plans/ path forward are essential elements in this communication.

We believe that we and the community should expect and deserve this respect.

We look forward to a full and prompt response.

Regards

Joe & Sheila Morrissey

Eircode: V35 KC79

Notes of GGE Clinic 22.7.25

From Joe Morrissey <j.s.morrissey@hotmail.com>

Date Tue 22/07/2025 16:01

To info@Garranegreenenergy.ie <info@garranegreenenergy.ie>

 1 attachment (19 KB)

GGE Clinic meeting. 22.7.2025.docx

Hi Nadine

Please find attached notes of today's meeting for your perusal. GGE undertook the following actions:

- a) Provide map identifying
 - Location of turbines and distances from our house (V35 KC79).
 - Access points off the N20 and L1537
 - Position of substation

We would be grateful for both an electronic and hard copy.

- b) GGE were also to identify where the bridges would be located, if possible on the map.

Regards

Joe and Sheila Morrissey

Questions and answers - GGE clinic 22/7/2025

GGE's representatives: Nadine, Patrick, Gary

1. How many turbines? 9
2. Where is nearest turbine to us? 761 mtrs
3. Is there a cluster? How many? How near to us? Map to be forwarded to us, with distances indicated.
4. What is height of turbines? 170 to 172 mtrs – depending on flood plain,
5. What is make of turbines? Vestas V150 6MW. Hub 95mtrs + blade 75 mtrs
6. Have you map to show location of turbines, and how far are each of them from us? As 3 above.
7. What are the criteria for the categories of residents:

Within 1km of turbines SEAI determine residences within 1km, entitled to fund.

Within 2km of turbines ?
8. Where are access points to turbine site for siteworks – (a) N20: North of Creggane Bridge. For delivery of turbines, and crane. This may require Garda Escort, road closure - at night.
(b) L1537: Approx 1 to 1.5 km south of our house (V35KC79), near substation. All construction site work traffic off L1537. Traffic management system being finalised. Circular system on L1537 will be in operation for site work traffic. Access points (N20 & L1537) will be indicated on map from GGE.
9. Where will substation be? In the access road off L1537. To be shown on Map.
10. How close to houses is the substation? 250/300 mtrs
11. Have residents nearest substation been advised and received all correspondence, visit etc. Yes

12. What is the purpose of the bridge over the Maigue? *Noted there is also a bridge over Charleville Stream. Both are required for access to the full site i.e. join both sides.*
13. Does bridge require separate planning permission from Limerick City & County Council (LCCC)? *LCCC and other public bodies will be notified. Planning for bridges will be part of overall planning application to ACP.*
14. Where will it be? *GGE to inform us of location of both bridges.*
15. When will planning permission be applied for? To ACP? *Within two months.*
16. Will planning applications be required from Cork Co Co/Limerick City & Co Co? *Both will be notified.*
17. If planning permission is granted by ACP, how soon afterwards would construction begin? *Depending on ACP decision – 12months to 3 years.*
18. Duration of Construction? *12-18 months.*
19. What do you mean by Community as in the Community Benefit Fund?
Anyone within 1km. SEAI appointed independent person will form a Committee of local people. Committee will allocate funding. Organisations within 10Km can apply for funding.
20. How can you guarantee the Community Benefit Fund? Is GGE/Greensource guaranteed an income? *Benefit Fund will depend on power generated. Fund will receive €2 for every mwh generated (mega watt hour). Greensource will bid in RESS (Renewable Electricity Support Scheme) auction. After successful bid, funding is guaranteed for 15 years. GGE only get paid for energy supplied.*
21. How many residences are within 1km? *30 to 50*
22. How many residences are within 2km? *170 approx. Includes 1km residences.*
23. Have you signed up landowners – how many? *Yes all signed up – under 10*
24. Have you signed up any residential landowners? *Don't know.*

25. Has Garrane/Greensource the investment fund to develop this site? And other sites? *Yes. After getting planning permission, Garrane will apply to banks for funding to build project.*
26. Who will the financial backers be? *Banks*
27. What is their long term commitment to the wind farm? *Greensource have a positive history of building and operating projects.*
28. Do GGE/Greensource have to retain ownership for a number of years? *No.*
29. Can they sell it on? At what stage? *Yes. After planning*
30. What is GGE's objection to holding a public meeting. *Health and safety of staff. We pointed to the difficulties of the current communication strategy employed by GGE. There is a complete lack of awareness of the proposed development within the community. We strongly encouraged GGE to host a public meeting so that all in the community would be aware of the proposed development and all would hear the same message from GGE.*
-