Niamh Kelleher
Garrouse,
Bruree,
Co. Limerick
V35P296

27/10/2025

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902
Ireland

Re: Objection to Proposed Wind Energy Development at Garrane, County Limerick – Planning Reference: [-Case reference: PAX91.323635)

Dear Sir or Madam,

Please accept this submission as a formal objection to the proposed wind energy development by Garrane Green Energy. The grounds for objection are as follows.

1) **Protected Species**

On the night of Saturday October 4th 2025 at approximately 8:30pm a young deer was observed running on the road in Garrouse, Bruree by our family. A capture of same is inserted below with a clear visual of the posters on the local road highlighting local concerns re the wind farm development. This confirms location as adjacent to the proposed development site.

It is our understanding, to the best of our knowledge, that this is a wild deer. I observe no reference within the applicants EIAR of an assessment of the impact of the proposed development on the local deer population.

All wild deer are mentioned under The Wildlife Act 1976 and would therefore place an obligation on the applicant to undertake a baseline ecological survey of the impact the proposed development would have on deer. This would aim to confirm deer presence, habitat usage, movement, and potential impacts.

I respectfully request that An Coimisiún Pleanála suspend any decision on this development until a full assessment on the presence and habitat usage of deer in the locality is undertaken.

2) Local Heritage

The area of the proposed development lies within an area of historic and archaeological significance. County Limerick's Landscape, Heritage and Green Infrastructure background papers [i] identify that the county is characterised by a distinctive, rural historic landscape, where patterns of settlement, field-system, watercourse and vernacular architecture contribute to sense of place.

Given this context, the proposed development has the potential to affect not only discrete heritage assets but the setting, views and landscape character of the broader heritage environment.

The EIAR baseline assessment submitted (Chapter 15 Cultural Heritage) confirms that the Study Area includes features of recorded and potential archaeological value and uses a 2 km study area for direct/indirect effects with a wider 10 km review for more sensitive heritage settings. It is acknowledged by the applicant that the proposed infrastructure (turbines, access roads, hardstands) may introduce indirect adverse effects on setting and landscape-heritage interaction (for example altering horizon lines, introducing vertical infrastructure into historic vistas). The EIAR identifies "slight to moderate, indirect, adverse effects on the settings of cultural heritage assets" during operational phases.

Current best practice emphasises that heritage protection requires understanding of landscape setting and historic landscape characterisation as a baseline. [ii] The fact that the EIAR acknowledges no "significant direct effects"

but still notes indirect effects on setting suggests that the assessment of setting and cumulative visual impact must be scrutinised carefully.

For those of us who live in this area, the cultural significance, the myths and stories associated with the area are our connection to our heritage and our living past. This area has vibrant hedgerows and many areas of historical and visual significance including Cnoc Samhna, Ballynoe Standing Stone, fairy forts and moats, Bruree Castle and Graveyard and Eamon De Velera's cottage to name a few.

I would respectfully urge An Coimisiún Pleanála to consider the significant impact to the locality and the tourist industry of altering vertical horizons through not only this development but additional proposed developments in Bruff and Ballinsky.

3) Outdated Guidance & Policy Deficiencies

It is my opinion that the **Wind Energy Development Guidelines 2006** pre-date many of the methodological advances in heritage/landscape assessment, cumulative impact analysis, and setting-vulnerability studies. It also does not take into account changes to Local Development Plans and the increasing size and frequency of Wind Farms in Ireland.

From a heritage protection standpoint, the statutory obligations under the Planning and Development Act 2000 along with the architectural and archaeological heritage protection statutes and policy, require that developments that materially affect the setting of heritage assets must demonstrate no unacceptable harm. Because the planning and assessment framework here utilises an older guideline, there is a risk that the application may not reflect the standard of protection implied by more recent policy. This is particularly in the context of the cumulative effects and horizon intrusion.

The continued development of the Draft Revised Wind Energy Development Guidelines (most recently updated 2019) along with broader national policy under the Climate Action Plan 2025 acknowledges that the old guidance is no longer fit for purpose. The existence of ongoing reform efforts strengthens the case that the current proposal should be assessed against modern best-practice principles, not minimum outdated standards and the best approach may be to suspend granting wind farm developments permission until a more nationwide and updated approach is taken.

4) Proposed Site is not Suitable

It is my opinion that the proposed development site is fundamentally unsuitable given the scale of the turbines proposed. Turbine technology and hub heights have increased significantly since the original national guidance was drafted in 2006, resulting in structures of unprecedented visual and physical dominance.

In 2007, the rotor diameter averaged around 57 m, in 2012 78 m and in 2023 117m. [iii] And with this development proposing a rotor diameter of 150 metre.

The local landscape is characteristically low-lying, open, with no capacity to absorb turbines of the height and magnitude proposed. Such a landform offers little screening potential, creating disproportionate visual intrusion over a wide radius and severely altering the established rural character.

Furthermore, wind resource mapping indicates that low-lying inland locations such as this do not benefit from the consistently high wind speeds required to justify deployment of very large turbines.[iv] The proposal therefore combines the greatest level of landscape impact with what I believe to be a comparatively weak renewable energy yield, representing a poor utilisation of land and undermining the core principle of site suitability that underpins sustainable energy development.

Conclusion

While supporting the principle of renewable energy development where appropriate and properly assessed, this objection is lodged because this application does not, in its current form, provide sufficient assurance that heritage, landscape and cultural assets in the local area will be protected to the standard required by Irish law and policy. The site of the proposed development does not appear to be suitable and a greater assessment on all protected species in the locality is also required. The reliance on outdated guidance, without contemporaneous safeguards, is a significant deficiency in the planning assessment.

Thank you for your time and consideration of this submission.

Yours Sincerely,

Niamh Kelleher

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[i] LIMERICK DEVELOPMENT PLAN 2022-2028 Background Paper Environment, Heritage, Landscape & Green Infrastructure https://www.limerick.ie/sites/default/files/media/documents/2020-08/background-paper-environment-heritage-landscape-and-green-infrastructure.pdf

[ii] The Heritage Council 2013 https://www.heritagecouncil.ie/content/files/historic_landscape_characterisation_guidance_2013_8mb.pdf?utm_source=chatgpt.com

[iii] EA Wind / NREL — Wind Technology, Cost, and Performance (Task 26 summary / related NREL material, 2015) https://docs.nrel.gov/docs/fy15osti/64332.pdf
EAI (Sustainable Energy Authority of Ireland) Community Toolkit / Onshore Wind (2024) — shows the long-term growth in rotor diameters. https://www.seai.ie/sites/default/files/publications/Community-Toolkit-Onshore-Wind.pdf

[iv] https://www.seai.ie/renewable-energy/wind-energy/wind-atlas-map