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Date: 31/10/2025

**Re: Case reference: PAX91.323635**  
**Proposed Garrane Green Energy Project, Ballynagoul, Creggane and Garrane, Co. Limerick**

Dear Sir/Madam,

The Maigue Rivers Trust is an environmental NGO established in 2016. The Trust has twelve directors drawn from sectors which represent a range of social, economic and environmental interests in the catchment. The Trust's purpose is:

*"To conserve, protect, rehabilitate and improve the rivers, streams, watercourses, lakes, groundwaters and water impoundments of the Maigue River Catchment, including adjacent estuarine and coastal areas, in the interests of ecological, economic, and social sustainability, enhancement of biodiversity, and for the benefit of people and communities. This is achieved by delivery of on-the-ground environmental, educational and recreational projects, involving stakeholders and volunteers, that address the causes of deterioration, encourage behaviour change, and create an appreciation of the value of our waterbodies."*

The Trust wishes to observe and comment, as part of the public consultation process, on An Bord Pleanale, case reference: PAX91.323635, the Proposed Garrane Green Energy Project, Ballynagoul, Creggane and Garrane, Co. Limerick. Our guiding principle in making these observations is that the location and construction of infrastructural projects must have no adverse impacts on the rivers and streams of the catchment, their aquatic life, and their associated riparian zones and habitats.

## **Proposed windfarm in a High Risk, Flood Zone A in the upper reaches of the Mague catchment**

The Garrane Green Energy Project at Ballynagoul, Creggane and Garrane, Co. Limerick project proposes a large 9-turbine wind farm in the upper reaches of the Mague catchment surrounding the confluence of the Mague, the Loobagh and the Glen rivers between Bruree and Charleville. The project also proposes two bridges and over 1.2km of access roads are to be built in a CFRAM Flood Zone A, next to where the Mague and Loobagh rivers meet.

Specifically in the Mague catchment, the impacts are likely to be:

- **Loss of the existing floodplain storage in the upper reaches of the catchment due to the creation of impermeable surfaces associated with wind turbine construction.**  
Bruree town which is immediately downstream of the project already suffers frequent flooding. The proposed works and acknowledged likely increases in water levels and unexplained calculations in the report does not adequately address the very likely increased risk of flooding to Bruree and the surrounding farmlands.
- **Decline in water quality due to increased runoff and subsequent sedimentation.**  
Increased runoff and subsequent sedimentation will inevitably impact salmonid habitats and aquatic invertebrates from what is proposed. Under the Water Framework Directive, Ireland is required to bring bad or moderate water quality water bodies up to good status and not cause water quality decline by 2027. The Glen (Q2-3), Loobagh (Q4 Garoose Bridge) and Mague's water (Q3-4 at confluence) quality status must be improved and not made worse.
- **Impact on 44 Annex I and red- and amber-listed bird species at Charleville Lagoons.** The ornithology baseline report provided by the Garrane Green Energy project does not include all Irish Wetland Bird Survey (I-WeBS) data from 1994-2022/23 for Charleville Lagoons which is directly adjacent to proposed 9-turbine wind farm. The EIAR claims that only 25 species are recorded in the I-WeBS data (p.21, Ornithology Baseline Report) whereas the complete I-WeBS dataset has recorded 44 species, including Whooper Swan, Mute Swan, Greylag Goose (resident), Shelduck, Wigeon, Gadwall, Teal, Mallard, Pintail, Shoveler, Pochard, Tufted Duck, Scaup, Goldeneye, Ruddy Duck, Little Grebe, Great Crested Grebe, Cormorant, Little Egret, Grey Heron, Water Rail, Moorhen, Coot, Golden Plover, Lapwing, Knot, Little Stint, Dunlin, Ruff, Snipe, Black-tailed Godwit, Curlew, Redshank, Green Sandpiper, Wood Sandpiper, Common Sandpiper, Black-headed Gull, Common Gull, Lesser Black-backed Gull, Herring Gull, Great Black-backed Gull, Garganey, American Wigeon, and Iceland Gull. Charleville Lagoons hosts

nationally important numbers of Shoveler ducks. All nine turbines will be located directly in the birds' direct flight path and are very likely to cause death and injury to the significant local wading bird population. The Trust does not agree the report's collision impact risk assessment as "negligible" and "not significant" (Table 8.27, Chapter 8 of EIAR).

- **Likely spread of invasive species, Giant hogweed *Heracleum mantegazzianum*.**  
Giant Hogweed *Heracleum mantegazzianum* is an established invasive plant species in the Mague catchment. Giant hogweed is listed in the EU list of species of concern (EU Regulation 1143/2014) and in Regulation 49 of the European Communities (Birds and Natural Habitats) Regulations S.I. 477 (2011) because of its threat to human health, negative impact on native biodiversity, impact on riparian soil integrity and prevention of recreational access to the river and riparian corridor. EU Regulation 1143/2014 requires member states to develop action plans (timetables for action, defined measures to be adopted, voluntary actions, and codes of good practice) to limit further spread of invasive alien species into or within the European Union. Under S.I. No. 477/2011, regulation 49, local authorities and landowners must prevent the dispersal, establishment or spread of an animal or plant to which GHW applies.  
Since 2018, Limerick City and County Council, Ballyhoura Development Company and the Mague Rivers Trust have made significant progress in reducing the spread of Giant hogweed in the catchment and each year they have extended the programme of works downstream. Any project that involves moving soil, such as this proposal, has been shown to exacerbate the spread of invasive species.

In conclusion, it is the view of the Mague Rivers Trust that the current proposed **Garrane Green Energy Project, Ballynagoul, Creggane and Garrane, Co. Limerick** presents significant adverse risks and impacts to the rivers of the Mague catchment that needs to be addressed before permission is granted.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Elizabeth Gabbett'.

Elizabeth Gabbett

Mague Rivers Trust Director for Wildlife Interests on behalf of the Mague Rivers Trust