Julianne Stokes Lisrobin Ballinagoul Kilmallock Co. Limerick V35 R159

The Secretary,

An Coimisiún Pleanála,

64 Marlborough Street,

Dublin 1,

D01 V902.

An Bord Pleanala Case Ref Number, 323635

Garrane Green Energy Ltd 9 No Turbine Wind Farm to be located at Garrane, Ballynagoul, Creggane, Co. Limerick

Dear Sirs

I am writing on behalf of myself and my family who live in Ballinagoul, V35 R159 identified on Garrane Green Energy Ltd (GGE) EIAR planning submission as receptor H13. See EIAR Chapter 1 Figures map page 3. The proposed wind farm will have a detrimental impact on the quality of life of my family and many of my neighbours.

I'll be objecting on four grounds

- **Lack of community engagement**
- **Breach of both 2006 Wind Energy Development Guidelines and the draft 2019 Guidelines**
- **Traffic – L1537 unsuitability for heavy construction traffic**
- **Unsuitability for the land and location**

Objection to the Community Engagement Process – Garrane Wind Farm Proposal

1. Failure to Notify All Affected Residents

The Community Engagement Report states that households within 1 km and 2 km of the project were notified through letters, leaflets, and door-to-door visits

Appendix 1.5 Garrane Community Engagement Report August 2025

However, multiple residents within 1 km of the proposed wind farm confirm they did not receive any form of direct communication. This undermines the developer's claim that

meaningful consultation was carried out, and calls into question the accuracy and completeness of their engagement records. The door to door visits were carried out during office hours when many people were away from their homes. I was not home the day they called to houses. On finding the leaflet left behind a few days later at the side of the drive I contacted my neighbour directly opposite from me Receptor H12, they advised that GGE had called and had told them it was over in Garrane on the N20 side and would not impact us. H12 is within 800ms of T1, they were also told that the trees would block any view of the turbines. The majority of trees in the area are native deciduous trees that are bare for 5 months of the year, most are low growing and the hedgerows are made up of native hedging that is cut back annually. My neighbours were not aware of the true location until I advised them of it on July when GGE provided me with the location of the nearest turbine to H13. I emailed GGE a list of questions I have attached their response. The answers were provided on the 22nd May, they are saying that they don't know the exact locations of the turbines at that stage when they went on to submit the first planning application on 15th August.

Several of my neighbours only became aware of Garrane Green Energy's proposal when I and another neighbour called door to door over several nights intentionally between 7-9pm to ensure that people would be home and available to speak with us. H16 within 900m of T1 had not received any communication about the wind farm and was not aware of it until my neighbour in H17 made him aware of it on the 11/08/25. My neighbour in H17 had only become aware of it the week before when their brother a farmer had become aware that it would be next to his land. H15 is the elderly mother of H17 and only became aware when informed by both her affected children. The same for my neighbour in H18, who only became aware of it on the 12/08/25 when myself and H17 called to him. My neighbour in H14 wasn't really aware of the wind farm until he saw the notice that the Bruree Charleville Effin Wind Farm Action Group put in the Vale Star in August. H87 at the bend close to the proposed entrance to the site only heard about it on the 13/08/25 when called to by myself and H17. We were unable to contact H88 at any time. H89 never received any communication from the developers even though the site entrance is next to their gate and substation will be directly behind them. They were told by their neighbour H19 that a wind farm was proposed for the area but not to worry it would have no effect on them. H19 has signed an agreement with Garrane Green Energy allowing them to run cable across their land. See Appendix A (signatures)

Once the planning application was submitted we found that GGE had placed a notice in the Limerick Leader back in April, the area is on the border with Cork and the Limerick Leader would have a very small circulation in this area. Nothing was placed in the Vale Star and while this is a small local paper, it is one that had a notice been placed in it whether a resident was a reader of it or not the majority of residents affected would have heard about the proposed wind farm in April. The use of Garrane as the name of the wind farm was also very misleading to many people in the locality as there are several Garrane in Limerick and one already has wind turbines. Also the spelling of Ballynagoul, while this is the spelling on the ordnance survey map it is not the postal address spelling. Had GGE intended to be transparent and ensure public engagement they could have easily placed a notice in the Vale Star as a well the Limerick Leader.

1.2. Lack of a Public Meeting

Despite residents requesting a town-hall style meeting, none was provided. Instead, the developer substituted one-on-one "community clinics" as the main engagement forum

Appendix 1.5 Garrane Community Engagement Report August 2025

On page 18 of the report, it is explicitly stated that clinics were designed to "replace the traditional town hall meeting" because the developer wished to avoid opposition voices dominating, there are only 31 houses with the 1 km limit, saying opposition implies that GGE saw the residents living in the area as an obstacle to be overcome rather than people to be engaged with.

Appendix 1.5 Garrane Community Engagement Report August 2025

This substitution is contrary to best practice under the Draft Revised Wind Energy Development Guidelines (2019), which recommend open and inclusive forums to build public trust. The absence of a genuine public meeting deprived the wider community of an equal and transparent opportunity to participate. On the nights of 11th 12th and 13th August myself and my neighbour collected signatures from neighbours starting at H12 down to V35 KD51 (the farm whose entrance is at the first blind bend on the L1537) requesting a public meeting with the developer. We called to homes in the evening between 7-9pm and the majority of residents were home. This was also how several neighbours became aware of the wind farm or its true location for the first time. See Appendix A (signatures) Had Garrane Green Energy called between this hours they would have been able to speak directly with the majority of residents.

Bruree Charleville Efffin Wind Farm Action Group held a public meeting in Bruree Community Hall on August, approx. 150 people attended from Bruree and Charleville as well as the residents directly affected, along with Limerick Councilors who said they had not been contacted by GGE and only became aware of the wind farm when contacted bythe action group.

1.3. Extremely Limited Participation in Clinics

The developer acknowledges that of the 31 dwellings within 1 km, only 13 households engaged through clinics not all 13 live within 1 km some of those 13 lived within the 2km radius and had heard about the clinics from those who had already booked appointments.

Appendix 1.5 Garrane Community Engagement Report August 2025

This equates to less than half of those most directly affected. Many residents were unaware of the clinics or the project itself. This reflects not community indifference but a communication failure: either the outreach was inadequate, or the materials were not effectively distributed or publicised. As such, the engagement cannot be described as representative. The clinics were carried out the week of 21st July many of my neighbours were not aware and had received no communication from Garrane Green Energy at that point.

GGE say they provided multiple ways for residents to engagement with them, however must residents only found out about the proposed wind farm via a few concerned neighbours putting together Bruree Charleville Effin Wind Farm Action Group. BCEWFAG set up a facebook page must of the followers initially were family and friends of the group trying to increase its visibility by following it. News of the wind farm didn't spread properly until BCEWFAG placed a notice in the Vale Star at the start of August. It isn't a lack of concern but the limitations of life, residents in the area do not have the specialist skills or the time to read through a largely technical document of over a thousand pages and put together an objection. A few due to the circumstances do not the disposal finances to pay the €50 fee.

1.4. Misrepresentation Regarding Substation Notification

I attended a clinic 22nd July at 5pm and specifically asked about the substation location, they said they didn't know it's specific location, they pointed at the bend where H87, H88 and H89 are located and said somewhere around here. I asked what size was the substation going to be and was told it would be hidden from view behind green fencing and the building itself was a small single storey building. It would be small, nothing to worry about and would have no impact us. I asked would we be told where it was once they knew and was informed that only the residents within 300 m would be notified. Other than myself my neighbours living in H14, H15 and H16 are the closest to the substation and none of them were notified. My home itself lies just 168 m from the substation compound, yet I received no direct communication about its location or potential impacts. The only reason I became aware of its proximity was by examining the planning application documents. This omission demonstrates a serious gap in disclosure and fails the basic requirement of transparency. The substation is not small and not nothing to worry about it's ***AIS 110kV Substation, with a 'loop in' Grid Connection to the existing 110kV overhead line between Charleville and Killonan, including two single-storey control buildings with welfare facilities, all associated electrical plant and equipment, security fencing, gates, signage, all associated underground cabling, private well for water supply, wastewater holding tank, and all ancillary structures and works*** Chapter 2 Project Description 2.2 page 2. They will be pile driving 168ms from my home for several days in order to lay foundations. Not only will the noise during construction affect us but the noise and vibrations from the substation will impact us, and GGE didn't see any need that I should be informed of this when we met.

At this meeting I informed them that I was very concerned about the affect the noise from the turbines would have on my son and explained that he is on the autism spectrum and has severe sensory reactions to certain noises which can cause him extreme distress. They said at the meeting that this was a valid concern but did not give me any further information on the substation at any point.

1.5. Misleading Characterisation of Engagement Success

The report summary claims Garrane Green Energy followed best practice principles and engaged meaningfully with the community. However:

- At least half of residents within 1 km received no meaningful contact.

- No public meeting was provided despite explicit requests.
- Only 13 residents availed of the clinic, a figure insufficient to represent community views.
- Critical information on the substation was withheld from directly affected residents.

Such shortcomings are inconsistent with both the 2006 Wind Energy Guidelines and the 2019 Draft Revised Wind Energy Guidelines, which emphasise early, open, and inclusive consultation.

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2. Grounds of significant adverse impacts caused by shadow flicker, as identified in the Environmental Impact Assessment Report (EIAR), *Chapter 14: Shadow Flicker* (August 2025).

2.1 Breach of 2006 Wind Energy Development Guidelines

According to the **2006 Guidelines** issued by the Department of the Environment, Heritage and Local Government, "Careful site selection, design and planning, and good use of relevant software, can help avoid the possibility of shadow flicker in the first instance. It is recommended that shadow flicker at neighbouring offices and dwellings within 500m **"should not exceed 30 hours per year or 30 minutes per day"**

At distances greater than 10 rotor diameters from a turbine, the potential for shadow flicker is very low. *(Page 33, 5.12 Shadow Flicker Para 3 & 4) Wind Energy Development Guidelines 2006* .

However, the EIAR's own modelling shows that:

- **40 sensitive receptors** (38.28%) within the **1.5 km study area (10 rotor diameters from a turbine)** are predicted to **exceed 30 minutes of shadow flicker per day** *(Page 14, Para 3)*.
- **5 sensitive receptors** (4.42%) (**H6, H7, H8, H9, and H28**) are predicted to **exceed 30 hours of shadow flicker per year** *(Page 14, para 3)*.
- **6 sensitive receptors are predicted to reach or exceed one hour per day.**

This represents a **direct breach** of established national planning guidelines.

2.2 Failure to Align with 2019 Draft Revised Guidelines

The **2019 Draft Revised Wind Energy Development Guidelines** aim to **eliminate** negative shadow flicker entirely. Where this cannot be achieved, they require:

"Automated turbine shut-down to eliminate shadow flicker should be required as a condition of a grant of permission" *(Page 7, Para 1)*.

The EIAR shows that **73 out of 113 sensitive receptors** will still experience shadow flicker, despite proposed mitigation *(Page 20, Para 2)*. This demonstrates a **failure to comply** with modern best-practice standards.

2.3 Overreliance on Mitigation Measures

The proposal relies on **automated turbine shutdown systems** to control shadow flicker *(Pages 21-22 14.2.9.3)*.
This raises concerns because:

- If the systems malfunction or are **not properly maintained**, significant breaches of guideline thresholds **will occur**.
- No independent monitoring framework is proposed to ensure compliance.

Given the **high number of receptors affected**, reliance on mitigation introduces **substantial uncertainty**.

Our home as H13 is one of the 40 sensitive receptors that will exceed the daily allowance. Both my husband and son suffer with visually induced vertigo. My husband's is so severe that seeing flashing lights in his peripheral vision can leave him bedbound for days. We are deeply concerned about the possible impact shadow flicker, he has never experienced it and has not risked looking at videos of shadow flicker in case it were to induce an event. I have seen video of the shadow flicker from a wind farm in Kerry and I found it highly annoying and I have no sensory issues.

At the GGE clinic I specifically asked about shadow flicker and was told again not to worry, it won't affect us, there would be software used to monitoring system and control shadow flicker. I have seen videos and spoken to residents living near turbines who's homes are affected by shadow flicker, these are supposed to be controlled by mitigating measures, but homes are still impacted. The EIAR states in 14.2.9.3 (page 22 para 1) When the control system detects that the sunlight is strong enough to cast a shadow, and the shadow falls on a sensitive receptor or sensitive receptors, **then the turbine will automatically shut down; and will restart when the potential for shadow flicker ceases at the effected sensitive receptors**. However in (page 22, para 2) it further states The proposed method of mitigation will be implemented to mitigate shadow flicker effects at all sensitive receptors within the study area, **allowing for a short period of time for the rotor to come to a stop.** The length of time it takes for the turbines to shut off can be up to 20 minutes. GGE have in their calculations in Appendix 14.1 of the EIAR of the exact month, day, hour and minute that shadow flicker could possibly occur at each receptor. Instead agreeing to ensure that all 9 turbines are programmed to shut off before these times to ensure complete elimination of shadow flicker they will be using software to only start the shutdown process once light is detected.

There will be no independent monitoring and it will be left to the residents affected to fight it out with GGE once the turbines are in place. (page 22, para 2) In the event that complaints

of shadow flicker are received by the Developer / site operator or by Limerick City and County Council, **the Developer will conduct an investigation and the complaints frequency, duration and time of complaints will be considered and specialist modelling software will be used to confirm the occurrence(s). Should the complaint persist, a shadow flicker survey involving the collection of light data will also be carried out at the sensitive receptor in which the complaint was made.** Further refinement of the blade shadow control system will be conducted to mitigate negative shadow flicker occurrence. All this could be avoided by GGE simply programming the turbines to have shut down before their calculated times rather than depending on software to detect strong enough sunlight. This lack of initiative shows GGE is not taking all necessary steps to eliminate shadow flicker.

3. Grounds of adverse impacts caused by Noise Nuisance, as identified in the Environmental Impact Assessment Report (EIAR), *Chapter 11: Noise and Vibration* (August 2025).

Similar with regards to the impact of sound on residents –the following are cause for concern

3.1 Assessment or Adequacy of Mitigation:

a. Receptors Near or Above Noise Limits

- The report states that *"there are twenty-nine properties within 5dB of the 43dB lower fixed limit, when all turbines are operating at their maximum noise levels"*.
    - This means many homes are predicted to experience sound levels close to regulatory thresholds, leaving minimal safety margin for modelling uncertainty or real-world variability.

b. Model Conservatism Assumptions

- It claims that *"predicted noise levels are in the region of 2dB more conservative than the measured levels taken during post compliance monitoring"*.
    - This assumption relies on theoretical or past data rather than site-specific post-construction verification.

c. Exceedance at a Sensitive Receptor

- It explicitly notes *"The operational noise emissions from the Project exceed the night-time noise limit of 43 dB at one sensitive receptor (H9) at wind speeds of 7 m/s and greater"*
    - This is a direct breach of the 2006 Wind Energy Development Guidelines (WEDG06) threshold and is a clear point for objection unless mitigation is proven effective.

d. Limited Assessment of Amplitude Modulation (AM)

- AM (the “swish” or “thump” effect) is acknowledged, but the mitigation plan relies on the operator *“amending the operating mode”* if issues arise post-construction.
    - This is reactive rather than preventative, which could be argued as non-compliant with precautionary planning principles.

3.2. Independent Monitoring or Review Once Turbines Are Built

While there is mention of **post-construction compliance monitoring**:

“The results of the initial noise compliance monitoring [are] to be submitted to and agreed in writing with the planning authority within 12 months of commissioning of the wind farm.” 11.2.3.2 page 7

However, the document does **not** state that an **independent** body (i.e., one separate from the developer or their consultants) will conduct this monitoring. The text only commits to submission to the **planning authority** for agreement, implying review but not independent measurement oversight.

There is no mention in the EIAR Chapter 11 of a route for residents to report noise nuisance from the wind farm

Byrne & Anor V ABO Energy Ireland Limited & Ors, 2025 The court has ordered the shut down three turbines of a 6 turbine wind farm, due to the impact of noise nuisance and shadow flicker on the plaintiffs home 1050m from the nearest turbine. Initial planning permission was granted on the basis mitigation measures being put in place and noise compliance monitoring put in place and agreed with the local council. However the defendant did not implement mitigation measures despite the residents and local council’s numerous reports to them of both noise nuisance and shadow flicker over multiple years they had refused to engage.

3.3. Controls to Reduce Noise During Increased Wind Speeds

Noise control in higher wind conditions is managed through **turbine operational modes**:

- Turbines *“are able to operate in various modes”*, and *“if specific conditions arise that AM is generated, the operator can amend the operating mode to sufficiently mitigate the generation of AM or reduce the overall noise level”*
- The document also references *“curtailment strategy”* measures in which sound power can be reduced depending on wind direction and speed

These are software-based mitigation systems, not physical noise barriers or fixed engineering controls.

3.4. Controls to Ensure Reduced Noise Overnight

Mitigation for nighttime operation includes:

- Designing to meet a **43 dB(A)** fixed night limit (from 2006 WEDG and later planning conditions).
- For exceedances, the document refers to *"mitigation measures... detailed in Section 11.8.4.2" Turbines T2 and T3 shall be operated in Sound Optimised Mode SO0 during certain conditions. Sound Optimised Mode SO0 has a lower maximum Sound Power Level at hub height of 104dB, compared to the maximum Sound Power Level of 104.9 dB when the proposed turbines are operating in Mode PO6000*..
- There is also a **curtailment strategy** shown to reduce the exceedance at receptor H9 from 43.3 to 43.0 dB(A)

However, this reduction is minimal (0.3 dB), and the reliance on operational curtailment rather than guaranteed fixed design compliance is insufficient for nighttime protection.

3.4. Compliance with or Breaches of 2006 and Draft 2019 Wind Energy Development Guidelines

- **Compliance claimed:** The project is designed to comply with *"the 2006 Guidelines and noise limits attached as conditions to recent 2022 An Coimisiún Pleanála decisions."*
- **Potential breach:** One receptor (H9) **exceeds** the 43 dB night-time limit from WEDG06.
- **Draft 2019 Guidelines:** These are acknowledged but not yet binding; however, the report admits that *"a mitigation strategy... can be put in place to comply with any specific variation in noise limit levels if new more restrictive guidelines are adopted"*.
    - This indicates **non-compliance with 2019 draft limits at present**, but a promise of future adaptability.

3.5. **Amplitude Modulation, Infrasound, Low Frequency Noise and Vibration**

(11.2.3.7 page 10) Institute of Acoustics Statement in Respect of Wind Farm Noise The Institute of Acoustics is the professional body in Ireland and the UK for those working in the field of acoustics. In December 2024 they issued a statement with regard to Amplitude Modulation, Infrasound, Low Frequency Noise and vibration, as presented below:

- Amplitude Modulation 'Amplitude Modulation' (AM) is a feature of the character of wind farm noise caused by the cyclical nature of the blades. An understanding of the causal mechanisms has been gained in recent years, along with control methods to help assist with sites where AM can lead to complaints.
- Infrasound The IOA is aware that there is some information presented at planning inquiries suggesting the potential for physiological health effects from infrasound from wind turbines. It is current advice to members that there is no need to assess infrasound as part of the noise impact assessment process, as the absolute levels are

well below those reported to trigger physiological health effects based on peer reviewed research to date.

- Low Frequency Noise The IOA is aware that there is some information presented at planning inquiries suggesting the potential for physiological health effects from low frequency noise from wind turbines. It is current advice to members that there is no need to assess low frequency noise as part of the noise impact assessment process, as the absolute levels, whilst potentially audible at typical receptor distances, are well below those reported to trigger physiological health effects based on peer reviewed research to date.
- Vibration Vibration from operational wind turbines has been measured by extremely sensitive measurement equipment such as seismic arrays. but in terms of human perception, measured vibration levels are well below perception thresholds even on the actual wind

Based on the IOA guidelines the acoustic engineers have disregarding carrying out measurements for the above, yet all these issues are raised repeatedly at planning and as complaints by those living near wind farms. My son hears sound a frequencies and levels no one else in the family can hear, noises that I would barely notice can leave him wanting the claw his skin off. We're cannot afford to be dismissive about the possible impact of Amplitude Modulation, Infrasound, Low Frequency Noise or vibration, as well the affect the contentious swooshing of the blades or the grinding of the gears of the turbine each time it starts. Any of these could make home unbearable for my son.

The EIAR provides evidence that noise predictions rely heavily on modelling assumptions, contain exceedances of limits, omit cumulative effects, and depend on operator-led adjustments rather than enforceable pre-emptive measures. As with shadow flicker there is an **overreliance on mitigation measures. In the** Byrne & Anor V ABO Energy Ireland Limited & Ors, 2025 the house was over a kilometre, 1050m from the nearest turbine and yet they were affected regularly by noise that exceeded 45db. Our home is 751ms from the nearest turbine and 168ms from the substation compound, I did not find any information on the amount of noise created by the substation once it is in operation only the noise levels likely to be created during construction and decommissioning.

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4. Impact of Traffic during Construction on the L1537

The L1537 is a rural back road mostly used by residents and as a divert for Limerick to Cork traffic on the N20 due to the high number of collisions between Rourke's Cross and Charleville. Most parts of the road are not wide enough for two vehicles to pass each other and one has to move into the verge while the other goes on. Both sides of the road ditches 80-100cm deep, a stream flows through the ditch on the N20 side from just after my house down towards H100, the ditch on the otherside is a drainage ditch as the soil is heavy clay

and the fields on both sides are prone to flooding in heavy rains. It has several narrow blind S bends, the ones at H88, H89 and H91 are particularly bad in winter when black ice can stay there until midday when sun finally reaches an angle that can thaw the road. Every winter I have seen at least 2 cars that have gone into the ditch waiting to be pulled out. There is a three hump historical bridge built circa 1820 over the river, the bridge can only take one vehicle at a time and given its age and original purpose it would not be able to sustain continuous daily heavy goods vehicles.

All the pictures of the L1537 represented in the EIAR Chapter 17 Traffic and Transport are misleading. The aerial shot and street view of the turning from the R515 into the L1537 does not show that it is at the blind bend with a farm entrance just above the turn, out of sight from oncoming traffic, not 50ms from the R515. The picture of the entrance to the site from the L1537 side does not show that there is a blind S bend at the turn in front of H89 and has a sharp turns again in front of H88, drivers coming from the Charleville have some limited sight around the bend but those coming from the Bruree side are blind. The road regularly becomes blocked during silage season when the large harvesters and trailers are using the road. Until the recent change in national speed limits the L1537 was a 80km road anyone who knew the road would drive at 50km at most. Charleville side of the road has now been reduced to 60km in line with the new national speed limits for rural roads. The EIAR still lists it as an 80km road.

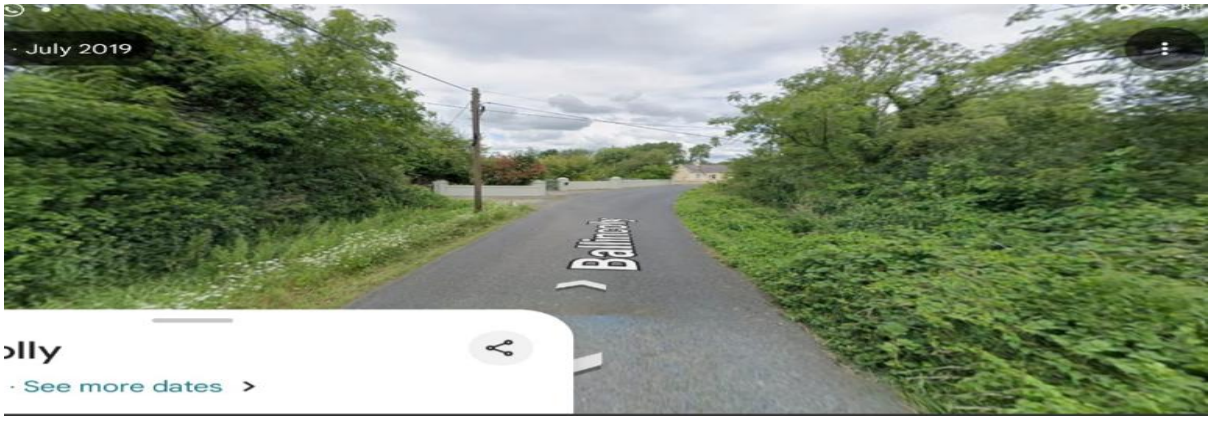
The above picture is the bend in front of H88 coming from the Bruree side to the site entrance.

The above picture is of the entrance turn from the Charleville side, the white pillar of H89's gate can just been next to the proposed site entrance.

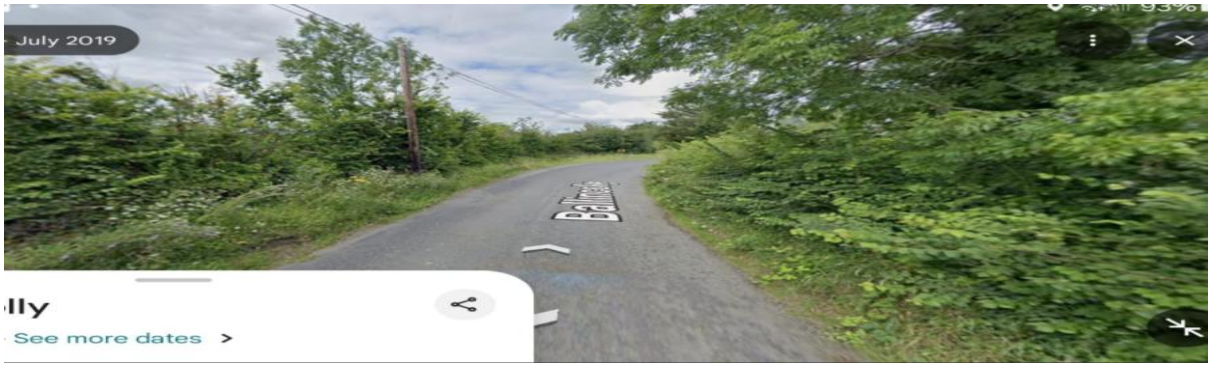
Below is a view of the bridge from the Bruree side, the road is fairly straight once over the bridge but still not wide enough for two vehicles to pass comfortably.

Below is the bridge from the Charleville side the road is particularly narrow at this point before the bridge and cars have to pull over into the verge to allow the other vehicle to pass the bridge.

Both pictures below are of the bend at H91 another narrow Blind S bend.



Below is the first bend coming off the R515 approx 50m into the L1537 the bend is completely blind from both sides.



All pictures are taken from google maps nothing has changed over the years all hedgerows are cut back every autumn and trimmed down.

On a general note neither L1537, Rourkes Cross or Charleville are suitable to handle the level or type of traffic the works will require. As late as Friday the 24th October there were two collisions the first on the limerick side of Charleville and the second on the diverted traffic route. There was a third collision on Saturday the 25th October at Rourkes Cross. The stretch of N20 between Coom and Charleville has been described as a country track by Minister Niall Collins. Charleville main street has suffered pedestrian 10 deaths due to HGV related road accidents. There were 2 alone in 2023 within 3 weeks of each other. This does

not included the incredibly high number of collisions that occur on the road where fortunately no one has died but still serious injuries have been sustained.

At the GGE clinic I asked about what plans they had for traffic management and how it was going to impact residents during the construction process as I had been advised it could take up to 18 months. I explained I have two school going children who would still be in school once construction started if they were to get planning permission. Again the answer was not to worry it was all in hand there would be a one way system in place which direction it would be they did not know yet and the works would be carried out during normal working hours, the hours would not impact us getting our children to their various schools or ourselves to work. Table 17.11 (chapter 17 Traffic and Transportation pages 46-47) shows that the deliveries will start dropping at site at 6am and traffic will finish at site at 8pm. While the real impact will be felt by Bruree and Charleville, this shows the communication style of GGE is misrepresentation and lacked transparency.

5. General Unsuitability of the Land and Location

I joking refer to my house as the lake lands as during the winter months due to the heavy clay soil both lawn on either side of my drive can become flooded in heavy rain and take several days to subside. We own the field directly behind and to right of my home and keep to rescue donkeys, the field had a huge amount of drainage work carried out on it by the pervious owner who was trying to get permission to build a house, however this was refused. Even with the significant investment by the previous owner the soil still becomes water logged through it is in much better condition then prior to the works. All this to say that with T1 being built directly behind this field, it having the largest base to support the turbine there increased change of flooding in my field and home.

Our home also operates on a septic tank and has its own well, with the potential increased flooding from fields that are used for agricultural land due to the construction of the turbine bases, there is a chance of the aquifer being contaminated and affecting my and my neighbours water supplies as well as the streams that supply my donkey's drinking water and the fields of the farmers who are not signed up to the wind farm.

Conclusion

It seems residents will very much be dependent on the good will of GGE to ensure the operation the wind farm does not detrimentally affect them, however GGE's attitude to communication raises grave concerns for their willingness to engage with the community if the wind farm is given permission. Green Source the parent company of GGE currently has plans for three separate wind farms in the between Charleville and Bruff, they have no history of operating wind farms that residents can refer to, to show that Green Source and through them GGE are trustworthy/competent operator.

On these grounds, we respectfully submit that the community engagement process undertaken by Garrane Green Energy was **deficient, misleading, and failed to meet national best practice standards**.

On the grounds of shadow flicker **Garrane Green Energy** have not carried out "Careful site selection, design and planning," as per the 2006 guidelines in selecting this site. 73 receptor of 113 will be negatively impacted failing to align with the 2019 Draft Revised Guidelines and 40 will exceed daily allowances with 5 exceeding annual allowances per the 2006 Guidelines. They have not complied with EIA Directive (2011/92/EU as amended by 2014/52/EU), in providing a detailed information of the shadow flicker control system.

On the grounds that **controls to reduce noise are** managed through **turbine operational modes** : software-based mitigation systems, not physical noise barriers or fixed engineering controls. Again overly dependent on the implementation of mitigation measures and that a one receptor is already identified as being in breach of the 2006 guidelines.

On the grounds that the L1537 is not suitable as an access point for the site given the road layout from the R515 to the Bridge on the L1537.

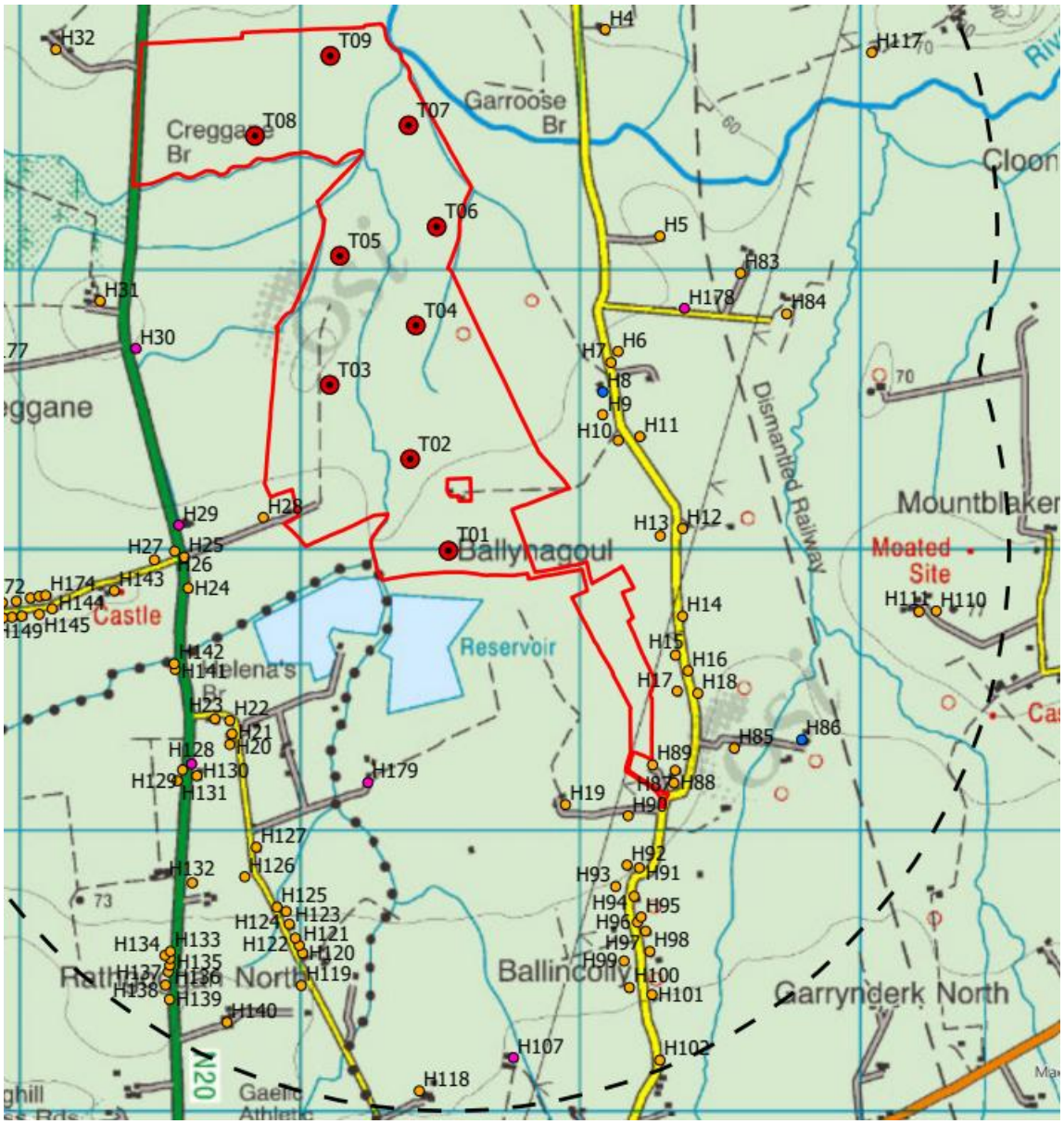
On the grounds of the increased risk of flooding due to the construction of the turbine bases in already flood prone area with heavy clay soil and poor natural drainage.

We request that An Coimisiún Pleanála give due weight to these shortcomings and recognise that the planning application does not meet the required threshold for meaningful public consultation.

Yours sincerely

Julianne Stokes

Section of chapter 1 figures page 3 receptor map



My Email to Garrane Green Energy after speaking with my neighbour

From: Julianne Cott <juliannemjc@gmail.com>
Sent: Tuesday, May 20, 2025 1:08 PM
To: Info Garrane Green Energy <info@garranegreenenergy.ie>
Subject: Eircode V35R159

This is the first time you received an email from this sender (juliannemjc@gmail.com). Exercise caution when clicking links, openi

Good afternoon

Could you please advise how many turbines you are proposing to build in Garrane, what acreage will they take up? It say capacity for 9.
Do you have a site layout of where each of the turbines will be located in Garrane?
Will this development then need high voltage pylons? If so where will these be located?

How far will the nearest proposed turbine be from our house? Distance in meters.

What will be the combined db(a) of the turbines?
How tall are they?
What impact on local wildlife will they have?

How long will the construction phase be?
Where will the construction site be accessed from?
Will construction impact traffic in any way on the Ballynagoul road?

I look forward to your response.

Kind regards

Julianne Stokes

Their response dated 22nd May

Dear Ms. Stokes,

Thank you for getting in touch in relation to the proposed Garrane Green Energy project. The current project proposal is to install up to 9 wind turbines, with a proposed overall height expected to be up to 170m and to connect to the electricity network via the existing overhead line. As the proposed turbine locations are not yet finalised, and consultation is ongoing, we do not have a layout map available. Once it is published, I will ensure to send it to you directly. Based on the indicative layout, I can confirm that the distance from the Eircode you provided in your earlier email (V35R159) to the nearest proposed turbine is over 750 metres.

As part of the planning process, Garrane Green Energy will ensure the project is constructed and operated to minimise noise. We will conduct extensive tests during the planning process to demonstrate that the proposed turbines will not exceed legislated noise levels. Currently, the guidelines for wind turbine sound levels in Ireland are set between 35 and 45 decibels depending on the time of day and the level of background noise.

In relation to impacts on local species, we are currently preparing an Environmental Impact Assessment Report. This report will be available to view within the planning application. The intended purpose of the EIAR is to:
• Inform decision makers and the public of the possible environmental effects and impacts associated with the implementation of the proposal,
• Determine potential impacts and associated effects

• Suggest mitigation measures for potential impacts where feasible

Garrane Green Energy are committed to improving the biodiversity in the area by implementing enhancement measures as part of the project.

We will also be submitting a traffic management plan for the construction phase of the project and while it is likely that there will be increased traffic during the construction phase, we are utilising best practice guidelines to keep disruption to a minimum. The duration of the construction phase is likely to be 12-18 months.

Further information on the project is available on the project website: https://garranegreenenergy.ie/key-questions/

We appreciate your interest and look forward to engaging with you and the wider community.

Kind regards,
Nadine

BRUREE / CHARLEVILLE / EFFIN WIND FARM ACTION GROUP

WE THE UNDERSIGNED REQUEST A PUBLIC MEETING WITH GARRANE GREEN ENERGY/GREENSOURCE TO DISCUSS PROPOSED 9 TURBINE WIND FARM DEVELOPMENT IN THE GARRANE, BALLINAGOUL, CREGGANE AREA.

NAME	EIRCODE OR ADDRESS
olivier Lefebvre	V35TY28 Ballinagaul Kilmallock CO LIMERICK
Helen Lefebvre	V35 TY28 Ballinagaul Kilmallock
Chloe Lefebvre	V35TY28
Ciaran Lefebvre	V35 TY28
Mairin Jones	V35 T978
Bill Jones	V35 T978
Mary Jones	V35 T978
Alma Jones	V35 T978
Kiera Jones	V35 T978
John Kennedy	V35 WP84 First Time choice
ANNE WALSH	V35 4968
SHAUNA WALSH	
SHANE WALSH	
AINE GANIGAN	
ALAN GANIGAN	
DARAGH WALSH	
ALANNAH HARAN	
TADGH HARAN	

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NAME	EIRCODE OR ADDRESS
MICHAEL WALSH	V35 Y968.
CIARA WALSH	
Shauna Walsh	
Yvonne Roche	V35 DX02 (First time hearing of this)
Cathal Kent	"
Mr. Healy	V35 NN82
12/8 Theresa O'Gorman	V35 ET78
12/8 John O'Keary	V35 PX82
Maria Shanahan	V35 RK77
John Shanahan	"
Marie Shanahan	"
Christina Shanahan	"
Sarah Curtin	
Helen Curtin.	V35 CY 99.
Tony Curtin.	V35 CY 99.
Christie Curtin	V35 DX60
Mary O Kelly	V35 KH30 This is the first time made aware 12/Aug 2025
Colin Clarke	V35 KH30.

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11/08/

NAME	EIRCODE OR ADDRESS		
Eileen Culhane	V35 DK13 Healy Pass		12/8/25
Dan Culhane	V35 DK13		
Jackie Hadella	V35 PP98		
Lydia Deane	V35 DF89	only hearing about it today.	13/8/25
Paul Hooper	V35 DF89		13/8/25
Jim Mannion	V35 RK35	heard	8/8/25
Heather Mannion	V35 RK35	heard	8/8/25
Chloe Mannion	V35 RK35	heard	8/8/25
Emma Mannion	V35 RK35	heard	8/8/25
Elaine O'Regan	V35 Y431	emailed & got no response in April.	
Tommy O'Regan	V35 Y431		
Conor O'Regan	V35 Y431		
Megan O'Regan	V35 Y431		
Ciaran O'Regan	V35 Y431		
Mike Murphy	V35 XV48		
Kathleen Murphy	V35 XV 48		
Maeve Murphy	V35 XV 48		
Grace Murphy	V35 XV 48		
Avril Murphy	V35 XV 48		

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NAME	EIRCODE OR ADDRESS
Julie Waters	V35 VW90
Colie Waters	V 35 VW. 90,
CLEMENT HEHIR	V35 KW 42
NOREEN KELLY HEHIR	V35 KW 42
THOMAS HEHIR	V35 KW 42

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NAME	EIRCODE OR ADDRESS
Kenneth Kearns	V35 CP20
Angela O'Brien	V35 N825
Rhyanne Kiely	V35 N825
Angel Kiely	V35 N825
Aine McCarthy	V35 FV07
Tim Kennefick	035 VX28
Martin Tierney	V35 YN27
PA Carey	V35 CK77
Rita Lawlor	V35 X436
Bobby McCarthy	V35 RK03

V

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NAME	EIRCODE OR ADDRESS
Andrew Cussen	V35UX57 Garrane
Breeda Cussen	V35VX57
Breeda Lowry	V35VX57.
Michael Brouder	V35 T205
Elaine [illegible]	V35 F438
Cian Harold	V35 F438
Ben Sheahan	V35 DW28
TraceyKelly	V35D423.
[illegible]	V35X996
FIONA LYNCH	V35XN53
Josephine MC Donnell	V35W589.
LIVIA ROHACOVA	V35 Y236
[illegible]	V352WE22
[illegible]	V35D512
[illegible]	V35YK37
ANNA ASLENDORF	V35 NT72
Carol O Carroll	V35 R295
Shantelle Totton	V35 PK26