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Subject: FW: Ref: 323448
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Attachments: [20251010-ACP-323448.pdf](#)

From: Sean O'Callaghan <socallaghan@antaisce.org>
Sent: Friday, October 10, 2025 4:12 PM
To: Bord <bord@pleanala.ie>
Subject: Ref: 323448

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A Chara,

Please find enclosed An Taisce's submission on planning application ref: 232448. Please advise if this email address is incorrect for sending observations on REDIII application types.

Kind regards,

Seán O'Callaghan
Planning and Environmental Policy Officer
An Taisce – The National Trust for Ireland
Email: socallaghan@antaisce.org
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An Taisce

The National Trust for Ireland

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20251010-ACP-323448

An Coimisiún Pleanála,
64 Marlborough Street,
Rotunda,
Dublin 1,
D01 V902.

Sent by email to: bord@pleanala.ie

10th October 2025

Ref: 323448

App: Garrane Green Energy Limited

For: 9 no. wind turbines, grid connection and all associated site works.

Site: Between Charleville and Killonan, Limerick

A Chara,

We thank you for referring the above application to An Taisce for comment.

1. Bird Migration and Wetland Proximity

It is recommended that the list of constraints selected by the applicant, as outlined on p.7 of EIAR Chapter 2, to inform site selection and layout design should contain potential bird migratory pathways, with further data collection being gathered if deficits exist for the migratory patterns of species residing in the adjoining wetland. This will ensure that rigorous collision risk modelling can be undertaken to inform the proposal. We would highlight the recent collision mortality of Golden Eagles in Donegal across various wind farms¹, which displays a worrying trend regarding collision risk modelling deficiencies and requires urgent rectification.

We note the close proximity of the artificially constructed wetland complex to the south of the proposed turbine locations, identifiable as 'Charleville Created Wetlands' (MIW_Code: MIX_LI74) in the Wetlands Survey Ireland ArcGIS mapping tool. These may contain an abundance and diversity of

¹ <https://www.donegaldaily.com/2025/10/02/three-white-tailed-eagles-killed-by-wind-turbines-in-south-donegal-1/>

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Olivia Rogers, Rónán O'Brien, Finbarr Murray, Helen Shaw, Terri Morrissey, Sinead Mercier, Phil Doyle

ornithological receptors which requires close consideration by An Coimisiún. In particular, we would highlight the most recent Irish Wetland Bird Survey (I-WeBS) Trends Report carried out by BirdWatch Ireland between 1994/95-2019/20, with 'Charleville Lagoons' listed as a surveyed site.² This is likely to correspond to the wetland located south of the subject site and should be clarified by An Coimisiún as a preliminary matter. Notably, this site contains nine bird species (Curlew, Dunlin, Shoveler, Mallard, Teal, Tufted Duck, Lapwing, Wigeon, Golden Plover), four of which are red-listed species of high conservation concern and three of which are amber-listed as species of medium conservation concern.³

It would appear that some of these species have not been included in the applicant's collision risk modelling, as per Section 8.11.2 of EIAR Chapter 8: Ornithology. The potential exclusion of important ornithological receptors identified in the I-WeBS report, as well as bird species which may have been surveyed by local ornithologists requires investigation and clarification by An Coimisiún. We also note that Table 8.27 of EIAR Chapter 8: Ornithology (p. 89) concludes that operational effects will be "*negligible*", "*not significant*". Given the close proximity of the wetland complex, the potential for high bird diversity and the potential exclusion of important resident bird species in the collision risk modelling methodology employed by the applicant, it is submitted that this impact determination requires clarification as a preliminary matter. In the absence of this, collision risk and potential impact for bird species may be higher than anticipated.

2. Water Framework Directive

We note the occurrence of the river waterbody labelled as the 'Charleville Stream_020' by the EPA under the Water Framework Directive (WFD) (2000/60/EC), which is designated as moderate water quality status and is considered to be at risk of not achieving good status by 2027.

The objectives of the WFD are to protect all high status waters, prevent further deterioration of all waters and to restore degraded surface and ground waters to good status by 2027. Specifically, where there is bad or moderate water quality there is the legal imperative to bring that water body up to good status by 2027.

Therefore, the proposal should be assessed against **Article 4** of the WFD to determine whether the project may cause a deterioration of the status of a surface or ground water body or if it may jeopardise the attainment of good surface or ground water status or of good ecological potential and good surface or ground water chemical status. We recommend particular consideration of potential siltation and sedimentation effects throughout construction of access tracks, burrow holes etc.

3. Architectural Heritage Impact

² https://birdwatchireland.ie/app/uploads/2023/08/iwebs_trends_0L003_Charleville_Lagoons.html

³ <https://birdwatchireland.ie/publications/birds-of-conservation-concern-in-ireland-bocci4-2020-2026/>

It is noted that part of the haul route for servicing the proposed operations will utilise Garroose Bridge, a recorded monument (Ref: 21904703) listed on the National Built Heritage Service (NBHS) website.⁴ It contains the following description and appraisal:

"Triple-arch humpback limestone bridge over River Loobagh, built c. 1820, with rubble stone and concrete walls. Render copings. Dressed V-cutwaters to west elevation. Dressed limestone voussoirs to segmental-headed arches.

This well designed and finely executed bridge was clearly constructed by skilled craftsmen. It shows signs of having been reconstructed, but this does not detract from its pleasing and rhythmical silhouette."

We would emphasise that Ireland has been a party to the Granada Convention for the Protection of the Architectural Heritage of Europe since 1997. Furthermore, the National Monuments Acts 1930-2004 provide for the protection of monuments of architectural, historical or archaeological interest which should be adhered to when determining the subject proposal. As currently articulated, we would have concerns over the impact of heavy construction vehicle impact upon Garroose Bridge. The sufficiency of the bridge for accommodating increased heavy vehicle movements should be assessed as a preliminary matter in advance of development consent determination, especially given the lack of enforcement capacity amongst the planning authorities. We would have concerns that the applicant's load analysis for the bridge may have overlooked weaknesses to the sides of the bridge which may not be made of concrete and may contain evidence of cracks. Other bridges of heritage significance which may be located along the proposed haul route also require close consideration by An Coimisiún, such as that contained in Bruree village. Some of these may be listed on the County Council's Record of Protected Structures or the record of NBHS monuments.

4. Recorded Monument Impact

It would also appear that 10 historic monuments occur within or close to the subject site red line boundary (LI047-030001: Church, LI047-111: Ring-ditch, LI047-032001: Moated site, LI047-033: Earthwork, LI047-115: Enclosure, LI047-109: Earthwork, LI047-114: Barrow, LI047-113: Ring-ditch, LI047-112: Ring-ditch, LI047-116). Consequently, the subject site is likely to be of high archaeological, historical and cultural significance. It is submitted that the integrity of these sites requires preservation via a 20 metre minimum buffer zone, between the development sites and these monuments. Close consideration should be given to proposed turbine locations, access track routes, borrow hole excavation sites, piling locations, substation location etc. It should be ensured that the applicant's EIAR factors each of these historic monuments into its impact assessment approach to ensure maximum rigour. Furthermore, it may be necessary for a further archaeological investigation and test to be carried out in advance of development consent determination, given the potential for further monuments and archaeological features of interest to be present throughout the site. This should not be left as a condition after the permission due to monitoring and enforcement constraints within planning authorities.

⁴ <https://www.buildingsofireland.ie/buildings-search/building/21904703/garroose-bridge-limerick>

5. Lacustrine Sediment

It is noted from the Wetlands Survey Ireland map⁵ that part of the subject site is located on lacustrine sediment, whose suitability for turbine installation and access route construction should be clarified as a preliminary matter. This sediment type appears to be linked with the occurrence of a wetland identifiable as 'Ballynagoul' (site code: MIW_LI330) which was surveyed during the Limerick Wetlands Field Survey 2025 and contains wet grassland, marsh, river, artificial pond and scrub habitat types. The site evaluation indicates an unknown rating of ecological value, necessitating the need for a further survey to inform a baseline ecological characterisation of the site. It should be ensured by An Coimisiún that this has been conducted adequately by the applicant's consultants to ascertain the potential for ecological and biodiversity features of value to be contained throughout the site. This would have implications for potential environmental impacts during the construction and operational phases of the development. An Ecological Impact Assessment (EcIA) could be requested as further information if the Biodiversity chapter of the EIAR, or the NIS, has neglected consideration of this wetland.

Please acknowledge our submission and advise us of any decision made.

Is mise le meas,

Seán O'Callaghan
Planning and Environmental Policy Officer
An Taisce – The National Trust for Ireland

⁵ <https://www.arcgis.com/apps/View/index.html?appid=e13b75c3bcab4932b992aa0169aa4a32&extent=-8.2467,53.7516,-7.7533,53.9208>