

ENVIRONMENTAL TRUST IRELAND

**Environment | Conservation | Biodiversity |
Ecology | Climate Change | Heritage | Advocacy**



Re: Planning Application - Reference number: ACP-323635-25

Direct Planning Application to An Coimisiún Pleanála in respect of a Strategic
**Infrastructure Development - Section 37E of the Planning and
Development Act 2000 (as amended),**

Applicant - Garrane Green Energy Limited

**Proposed Development: 9 no. wind turbines, grid connection and all
associated site works**

Location: - Townlands of Ballynagoul, Creggane and Garrane, Co. Limerick.

TO:

**AN COIMISIÚN PLEANALA,
64 MARLBOROUGH STREET,
DUBLIN 1.
D01 V902**

GROUNDINGS:

1. Proposed development:

The proposed wind farm development on a 158.75 hectare site over the townlands of Garrane, Garrose, Ballynagoul and Creggane in County Limerick is situated approximately 2 km north of Charleville, Co. Cork and just over 2 km south of Bruree, Co. Limerick. It will include the erection of 9 wind turbines with blade tip heights of 170 metres, rotor diameter of 150m and hub height of 95m, construction of two new bridge crossing over the River Maigue and the Charleville stream and excavation and construction of foundations and hard-standing areas in respect of each turbine.

The proposed development will include extensive modifications to existing roads and access tracks to facilitate delivery *inter alia* of abnormal loads and turbine delivery. The proposed development site will be accessed via the N20 Limerick – Charleville – Cork road and the L1537 local road.

The proposed development will include Installation of one permanent meteorological mast with a height of 60m for monitoring wing speeds.

The proposed development will include all works associated with the construction of a permanent onsite substation and connection of the proposed wind farm to the national electricity grid, via the 110kV line between Charleville and Killonan.

The proposed development will involve removal of 1,679 metres of hedgerow.

The proposed development by Garrane Green Energy Limited is more particularly described in the Site Notice as follows:

"The proposed development for which permission under Section 37E is being sought will include the following:

- Erection of 9 No. wind turbines with a tip height of 170m. The wind turbine will have a rotor diameter of 150m and a hub height of 95m.
- Upgrade of existing Access Tracks and construction of new permanent Access Tracks, permanent turbine hardstand areas and turbine foundations.

- Construction of two new bridge crossings on-site, one over the River Maigue and one over the Charleville Stream.
- Upgrade of existing site drainage network and installation of new site drainage.
- Wind Farm Internal Cabling connecting the wind turbines to the electrical substation.
- Construction of a permanent on-site 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.
- Construction of a permanent double circuit 110kV underground cable and two steel cable interface masts to connect to the existing overhead line.
- Erection of a permanent 60m Meteorological Mast for monitoring wind speeds.
- Construction of a Temporary Construction Compound for use during construction.
- Upgrade of the existing entrance on the N20 (Site Entrance 1) (to be used for abnormal loads and turbine component delivery) and upgrade of an existing site entrance on the L1537 (Site Entrance 2) (to be used for all construction traffic except for abnormal loads and turbine component delivery).
- 6 No. temporary spoil storage areas and 1 No. permanent spoil storage area.
- Biodiversity enhancement and improvements associated with the Project.
- Landscaping, fencing and all associated ancillary works."



Site location map

Environmental Trust Ireland raises the objections against the proposed development by Garrane Green Energy Limited on the following grounds.

2. INTRODUCTION:

Such a large scale development on circa 158.75 hectares has potentially enormous negative implications in this scenic area, to the severe detriment of the environment and human health, biodiversity loss, visual and scenic amenity and consequential economic loss to tourism related activities. The 170 metres height of the turbines is excessive, overbearing, overshadowing, visually intrusive and completely unsuitable for this agricultural lowlands area, requiring road works for access to facilitate delivery of abnormal loads and turbines. Further, the N69 from Foynes is a completely unsuitable road for delivery of the wind turbines to the site. No account has been taken in the EIAR of the proposed Foynes to Limerick road and the cumulative impacts of this development. The primary access point to the development is through a small local road. The surface water receptors onsite and nearby include several streams and drains which will impact upon European protected sites and on water quality. The noise and flicker from the turbines will adversely affect human health. Biodiversity loss, species and habitat loss is inevitable. The ecological loss of 1,679 metres of existing long established hedgerows which contain several ecosystems containing thousands of species interacting with each other in a dynamic state of flux is completely unsustainable and completely ignores Ireland's Biodiversity Conservation obligations. The proposed development has potentially enormous negative environmental implications in this area and is in breach of the Limerick City and County Development Plan 2022 - 2028. If permitted, it would cause detriment to the environment and human health, biodiversity loss, and impair visual and scenic amenity.

3. Inadequacies in Environmental reports submitted

The proposed development site and surrounding area is very important for biodiversity to thrive; ecosystems and the complex and dynamic inter-relationships which exist between species are constantly evolving and sub-populations of species

[illegible]

4. Material Contravention Of Project 2040 Objectives 59 and 60

"Biodiversity

5

status by the National Parks and Wildlife Service (NPWS) in 2013, with 9% being in a "favourable" state. Clearly, there is significant scope for improvement."

"The importance of our biodiversity is not restricted to legally protected areas and there are a range of measures in place to protect species and habitats more broadly. In this regard, the Habitats Directive contains obligations to protect certain species wherever they occur, while the Birds Directive contains protections for all birds, and they may only be disturbed or controlled subject to licence or derogation, as appropriate."

"The Environmental Impact Assessment Directive also requires that the direct and indirect significant effects of a project on biodiversity, with particular attention to species and habitats protected under the Birds and Habitats Directives are identified, described and assessed as part of the consent process. The diversity of our biological communities is also important for the quality of our water, soils and as a source of food. Land use change, including in particular pressures from urbanisation, can have a direct and indirect impact on Ireland's habitats and species."

National Policy Objective 59:

"Enhance the conservation status and improve the management of protected areas and protected species by:

"Implementing relevant EU Directives to protect Ireland's environment and wildlife;

"Integrating policies and objectives for the protection and restoration of biodiversity in statutory development plans;

"Developing and utilising licensing and consent systems to facilitate sustainable activities within Natura 2000 sites;

"Continued research, survey programmes and monitoring of habitats and species"

National Policy Objective 60 aims to:

"Conserve and enhance the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance."

The proposed development is not in keeping with the Biodiversity provisions of Project 2040 and materially contravenes Objectives 59 and 60 of the National Planning Framework. It ignores Ireland's obligations under the EU Biodiversity Strategy for 2030 and the UN Convention on Biological Diversity. It will involve substantial habitat and species loss which is completely unsustainable.

The environmental reports submitted by the developer contain a number of statements which themselves completely undermine the requirements to ensure that no reasonable scientific doubt remains that the proposed development will not have an adverse effect upon a European site or upon species or habitats protected under the Habitats Directive, the Birds Directive, the Environmental Impact Assessment Directive. For example, the dismissive references to common frogs which are present throughout the site which has many streams and drains, completely ignores the protection afforded to *Rana temporaria*, the common frog, under Annex V of the Habitats Directive, as a species which requires conservation measures. The references to habitat loss and hedgerow loss misleadingly suggest that the fact the hedgerows have not been subject to human intervention and management means they have a decreased value. This completely ignores the ecological value of these hedgerows and habitats. Even more telling is the reference to bat mortality in the EIAR. There appears to be a complete disconnect from what the environmental assessments should be seeking to accomplish and a disconnect from the precautionary principle, which makes the EIAR and the NIS unreliable. All bat species are subject to strict protection under Article 12 of the Habitats Directive and it is not permissible to kill, injure or disturb their roosting or resting places. Section 6.3.5.1 of Chapter 6 of the EIAR on Biodiversity, states that the site does not lie within a lesser horseshoe bat range, with the closest records for this species lying 18 km to the northwest at Grange. This is in conflict with the bat survey undertaken for the developer where Lesser Horseshoe Bat was recorded onsite on one occasion.

5. DEVELOPMENT PLAN:

Several provisions of the Limerick City and County Council Development Plan are relevant to the proposed development application ranging from reduction in visual and residential amenity to traffic policies on developments on regional roads to environmental Policies and Objectives.

For example, **Objective EH 03**

Ecological Impact Assessment

It is an objective of the Council to require all developments where there are species of conservation concern, to submit an ecological assessment of the effects of the development on the site and nearby designated sites, suggesting appropriate mitigation measures and establishing, in particular, the presence or absence of the following species: Otter, badger, bats, lamprey and protected plant species such as the Triangular Club Rush, Opposite Leaved Pond Weed and Flora Protection Order Species generally.

Although several species of conservation concern are likely to be affected, there was no ecological impact assessment report or adequate surveys for several of these species in material contravention of the Development Plan.

Other Council Policies likely to be negatively impinged by the proposed development include the following:

EH P1	To protect and conserve Limerick's natural heritage and biodiversity, in particular, areas designated as part of the European Sites Natura 2000 network, such as Special Protection Areas (SPAs) and Special Areas of Conservations (SACs), in accordance with relevant EU Directives and national legislation and guidelines. To maintain the conservation value of all-Natural Heritage Areas and proposed Natural Heritage Areas (pNHAs) for the benefit of existing and future generations.
EH P2	To ensure the sustainable management and conservation of areas of natural environmental and geological value within Limerick and to protect, enhance, create and connect, where ecologically suitable, natural heritage, green spaces and high-quality amenity areas for the benefit of biodiversity.

EH P3	To take into account the contents of the National Biodiversity Action Plan and the Biodiversity Climate Adaptation Plan and any forthcoming guidance or legislation on climate action, whether adaptation or mitigation that will emerge during the course of the Draft Plan
EH P4	To place ecological and environmental issues at the centre of planning policies and decisions and in doing so, will adhere to the objectives set out in Limerick's Heritage Plan 2017-2030.
EH P6	To ensure that water and air quality shall be of the highest standard, to ensure the long term economic, social and environmental well-being of Limerick's resources. The World Health Organisation Air Quality Guidelines will be the basis for the air quality guidance in Limerick.
EH P7	To proactively manage environmental noise, where it may have a significant adverse impact on the health and quality of life of communities in Limerick and to support the aims of the Environmental Noise Regulations, through the development and implementation of Noise Action Plans
EH 01	To ensure that projects/plans likely to have significant effects on European Sites (either individually or in combination with other plans or projects) are subject to an appropriate assessment and will not be permitted under the Draft Plan unless they comply with Article 6 of the Habitats Directive.
EH 02	To all developments in areas where there may be Lesser Horseshoe Bats, to submit an ecological assessment of the effects of the development on the species. The assessment shall include mitigation measures to ensure that feeding, roosting or hibernation sites for the species are maintained. The assessment shall also include measures to ensure that landscape features are retained, and that the development itself will not cause a barrier or deterrent effect on the species
EH 03	To require all developments where there are species of conservation concern, to submit an ecological assessment of the effects of the development on the site and nearby designated sites, suggesting appropriate mitigation measures and establishing, in particular, the presence or absence of the following species: Otter, badger, bats, lamprey and protected plant species such as the Triangular Club Rush, Opposite Leaved Pond Weed and Flora Protection Order Species generally.
EH 06	To require road developments to incorporate from the design stage, elements that will assist in the conservation of the Barn owl.
EH 07	To continue to actively support the aims and objectives of the All Ireland Pollinator Plan 2021 – 2025, by encouraging measures to protect and increase the population of bees and other pollinating insects in Limerick. To support the aims of the National Biodiversity Action Plan and succeeding plans, in emphasising the importance of ecological issues in planning

EH 08	To require the provision of alternative roosting or settlement facilities for species, such as bird or bat boxes, swift boxes, artificial holts (for otters), or other artificially created habitats in proposed developments, where considered appropriate.
EH 09	To seek the conservation and protection of features of geological interest within Limerick, particularly those that would have been recognised in the past as Areas of Scientific Interest or by the Geological Survey of Ireland as being of particular value. To undertake a survey of such sites
EH 017	To support commitments to achieve and maintain 'At Least Good' status, except where more stringent obligations are required. There shall be no deterioration of status for all water bodies under the Marine Strategy Framework Directive and its programme of measures, the Water Framework Directive and the River Basin Management Plan. Key challenges include, inter alia, the need to address significant deficits in urban waste-water treatment and water supply, addressing flooding and increased flood risks from extreme weather events and increased intense rainfall because of climate change.
EH 018	To maintain riverbank vegetation along watercourses and ensure protection of a 20m riparian buffer zone on greenfield sites and sites are maintained free from development. Proposals shall have cognisance to the contents of the Inland Fisheries Ireland document 'Planning for Watercourses in Urban Environments'

Several of these Development Plan Objectives have been undermined or set at naught by the proposed development.

6. **LOSS OF HEDGEROW:**

The proposed development is completely unsustainable and will result in massive habitat and ecosystem destruction arising from the removal of 1,679 metres of mature trees and hedgerows. These are irreplaceable.

Objective EH 012 of the Limerick County Development Plan 2022-2028 states that it is an objective of the Council to *"promote connecting corridors for the movement of species and encourage the retention and creation of features of biodiversity value, ecological corridors and networks that connect areas of high conservation value such as woodlands, hedgerows, earth banks, watercourses, wetlands and designated sites"*.



Plate 6.8: Hedgerows within site are mostly of hawthorn, blackthorn, ash and willow. View is of low hedge in southern sector site (near T01 location) (May 2024).

Examples of sections of hedgerows with their multiplicity of species which will be lost to accommodate wind turbines



Plate 6.9: The hedgerows in the eastern part of site have not been managed in recent years

In addition to hedgerow loss, trees on site will be removed to accommodate the substation and wind turbines



Plate 6.11: A mature treeline occurs along the northern boundary of the field in which the proposed substation is to be sited. This is mostly of poplar, with some willow (May 2024).



Hedgerow loss will also impact on bats, birds, small mammals including protected species such as pygmy shrew and hedgehog. Contrary to the developer's assertions, these losses cannot be mitigated, habitats which contain complex and interacting species mix and ecosystems once destroyed cannot be simply restored or replaced.

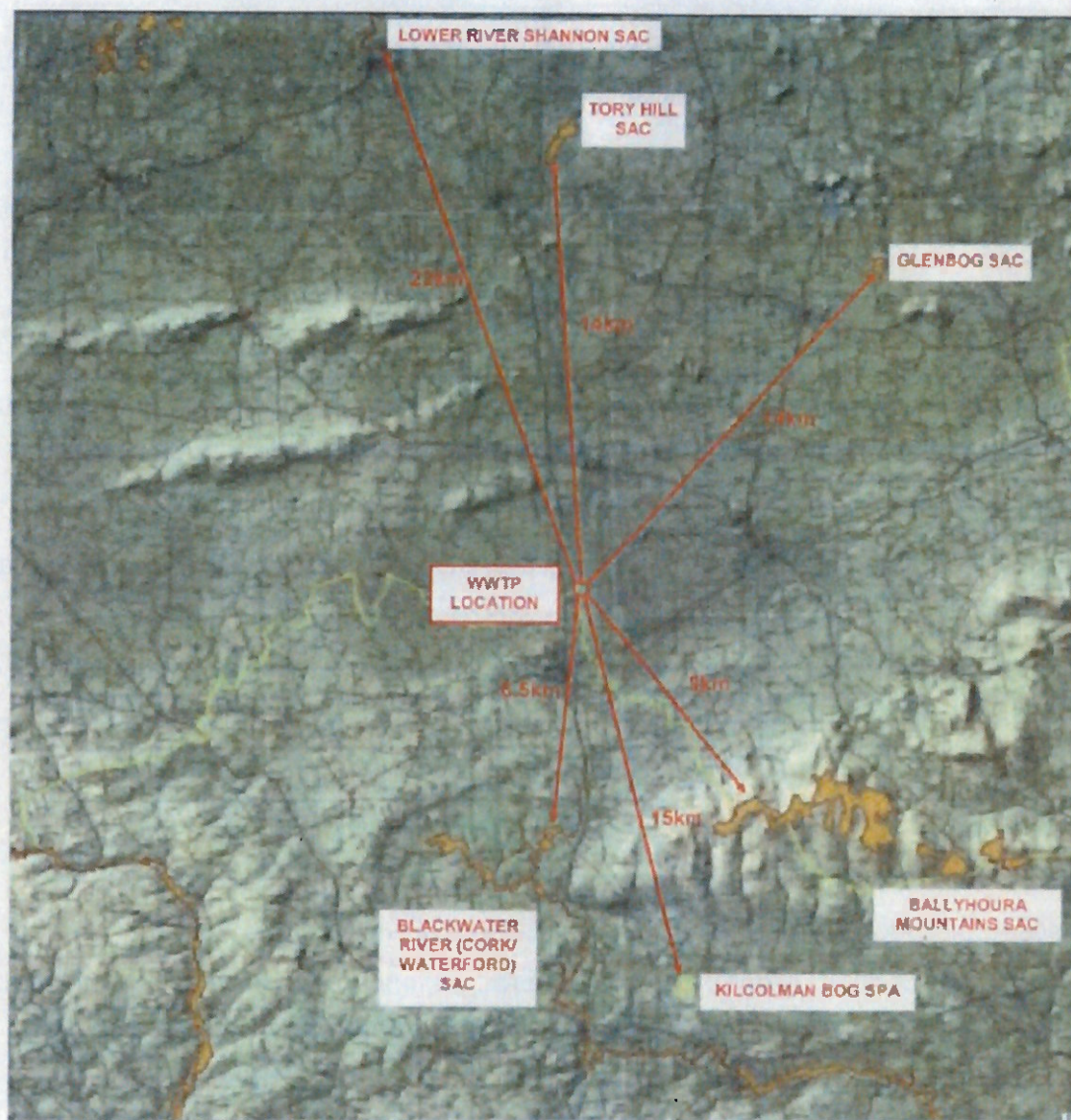
7. EUROPEAN SITES

INADEQUACY OF AA Screening Statement and Natura Impact Statement

7.1 The AA Screening Statement and Natura Impact Statement (NIS) are inadequate and do not take into account or properly take into account the environmental sensitivity of this site, the importance of the site to amphibians, the presence of species afforded strict protection on or near the site, the importance of the River Loobagh, the Charleville Stream and other waterbodies within the site to lamprey, salmon, European eel, otter, white clawed crayfish, the direct hydrological links including groundwater links and proximity to the River Blackwater SAC, the hydrological links to the Lower River Shannon SAC or the River Shannon and River

7.2 There are a number of European Protected sites which are within the Zone of Influence of the proposed development, with a large number of Qualifying Interests. Only two of the seven European sites identified were progressed to Stage 11, NIS, the remaining European sites were ruled out for further consideration at the AA Screening Stage on the basis of inadequate information and reports and on taking mitigation into account; the precautionary principle was not adhered to.





7.3 The nearest European site to the proposed Wind Farm Site is the Blackwater River (Cork/Waterford) SAC, which is at a distance of approximately 6.4 km to the south. Other sites are at distances of between 9 km (Ballyhoura Mountains SAC) and 14.7 km (Glen Bog SAC).

- Blackwater River (Cork/Waterford) SAC (code: 002170)
- Ballyhoura Mountains SAC (code: 002036)
- Tory Hill SAC (code: 000439)
- Glen Bog SAC (code: 001430)

- Kilcolman Bog SPA (code: 004095)

The Lower River Shannon SAC (code: 002165) (approximate 20 km distance from the Site) and the River Shannon and River Fergus Estuaries SPA (code: 004077) (approximate 25 km distance from the Site), were considered in the developer's assessment as they have hydrological connectivity with the Proposed Development Site via the River Maigue.

7.3. IMPROPERLY SCREENED OUT:

Most of these European sites were improperly ruled out from further assessment at AA Screening stage, the precautionary principle was not adhered to. The River Blackwater SAC which contains a number of qualifying interests including Crayfish, Killarney fern, Otter was not brought forward to Stage 11 assessment. There are a number of streams on site, the bedrock geology contains fault lines, there is an aquifer underneath the site, there is groundwater connectivity to the Blackwater River SAC. The hydrology map shows several streams on the site and surrounding it and some of the bedrock contains karst. Therefore, groundwater flow direction must be inferred as including connectivity to the Blackwater SAC. Further, the routes of the plethora of streams and from the site have not been identified or assessed thoroughly. Clearly, therefore a data lacuna exists and the t Blackwater SAC was improperly screened out and not brought forward to Stage II. Further, no compensatory measures for the impacts on this European site or upon the other European sites affected have been presented.

	August 2025) (*denotes a priority habitat)	
	SPECIAL AREAS OF CONSERVATION	
Blackwater River (Cork/Waterford) SAC (site code 002165)	<p>Estuaries [1130]</p> <p>Mudflats and sandflats not covered by seawater at low tide [1140]</p> <p>Perennial vegetation of stony banks [1220]</p> <p>Salicornia and other annuals colonising mud and sand [1310]</p> <p>Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) [1330]</p> <p>Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410]</p> <p>Water courses of plain to montane levels with the <i>Ranunculus fluitans</i> and <i>Callitriche-Batrachion</i> vegetation [3260]</p> <p>Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0]</p> <p>*Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, <i>Alnion incanae</i>, <i>Salicion albae</i>) [91E0]</p> <p><i>Margaritifera margaritifera</i> (Freshwater Pearl Mussel) [1029]</p> <p><i>Austropotamobius pallipes</i> (White-clawed Crayfish) [1092]</p> <p><i>Petromyzon marinus</i> (Sea Lamprey) [1095]</p> <p><i>Lampetra planeri</i> (Brook Lamprey) [1096]</p> <p><i>Lampetra fluviatilis</i> (River Lamprey) [1099]</p> <p><i>Alosa fallax fallax</i> (Twait Shad) [1103]</p> <p><i>Salmo salar</i> (Salmon) [1106]</p> <p><i>Lutra lutra</i> (Otter) [1355]</p> <p><i>Trichomanes speciosum</i> (Killarney Fern) [1421]</p> <p>According to this SAC's site Conservation Objectives document: NPWS (31 July 2012) Conservation Objectives: Blackwater River (Cork/Waterford) SAC, Version 1.0. Department of Arts, Heritage and the Gaeltacht, for each of the listed QIs, the Conservation Objective is to maintain or</p>	<p>The Redline boundary of the proposed Project, which includes the grid connection, as well as the section of the TDR where is approximately 6.4 km north of the SAC (closest straight-line distance). The Turbine Delivery Route requires habitat removal (other than tree pruning) only at the access point to the site on the N20 (which is within the Redline boundary).</p> <p>There is no ecological connectivity, such as wetland or woodland corridors, between the Project site and the SAC.</p> <p>There is no hydrological connectivity between the wind farm site and the SAC.</p> <p>It is concluded that there is no ecological or hydrological connectivity between the proposed Project and the SAC.</p>

Likewise, Kilcolman Bog SAC, Tory Hill SAC, Glen Bog SAC and Ballyhoura Mountains SAC were screened out from Stage II Assessment on the basis of inadequate information and assessment. These sites should have been brought forward for further analysis.

Tory Hill SAC (site code: 000439)	<p>Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (*important orchid sites) [6210]</p> <p>Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> [7210]</p> <p>Alkaline fens [7230]</p> <p>According to this SAC's site Conservation Objectives document: NPWS (3 August 2018): Conservation Objectives: Tory Hill SAC, Version 1. Department of Culture, Heritage and the Gaeltacht, for each of the listed QIs, the Conservation Objective is to maintain the favourable conservation condition of the Annex I habitats and/or the Annex II species for which the SAC has been selected.</p>	<p>The Wind Farm Site is located approximately 11 km north of the SAC. The Turbine Delivery Route requires habitat removal (other than tree pruning) only at the access point to the site on the N20 (which is within the Redline boundary).</p> <p>The Redline boundary of the proposed Project, which includes the grid connection, is approximately 14.4 km south of the SAC (closest straight-line distance).</p> <p>There is no ecological connectivity, such as wetland or natural grassland corridors, between the Project Site and the SAC.</p> <p>There is no hydrological connectivity between the Project Site and the SAC.</p> <p>It is concluded that there is no ecological or hydrological connectivity between any aspect of the Project and the Tory Hill SAC.</p>
Glen Bog SAC (site code: 001430)	<p>Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, <i>Alnion incanae</i>, <i>Salicion albae</i>) [91E0]</p> <p>According to this SAC's site Conservation Objectives document: NPWS (28 November 2017), Conservation Objectives for Glen Bog SAC [001430], Version 1.0.</p>	<p>The Redline boundary of the proposed Project, which includes the grid connection, is approximately 14.7 km southwest of the SAC (closest straight-line distance). The Turbine Delivery Route requires habitat removal (other than tree pruning) only at the access point to the site on the N20 (which is within the Redline boundary).</p>

European Site	Reasons for designation (information correct as of 1 st August 2025) (*denotes a priority habitat)	Distance from Project Area and summary of connectivity
	Department of Culture, Heritage and the Gaeltacht, for each of the listed QIs, the Conservation Objective is to maintain the favourable conservation condition of the Annex I habitats and/or the Annex II species for which the SAC has been selected.	<p>There is no ecological connectivity, such as wetland or woodland corridors, between the Project Site and the SAC.</p> <p>There is no hydrological linkages between the Project Site and the SAC.</p> <p>It is concluded that there is no ecological or hydrological connectivity between the Project Area and the SAC.</p>
Ballyhoura Mountains SAC (site code: 002036)	<p>Northern Atlantic wet heaths with Erica tetralix [4010]</p> <p>European dry heaths [4030]</p> <p>Blanket bogs (* if active bog) [7130]</p> <p>According to this SAC's site Conservation Objectives document: NPWS (18 August 2016), Conservation Objectives for Ballyhoura Mountains SAC [002036], Version 1.0. Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs, for each of the listed QIs, the Conservation Objective is to maintain the favourable conservation condition of the Annex I habitats and/or the Annex II species for which the SAC has been selected.</p>	<p>The Redline boundary of the proposed Project, which includes the grid connection, is approximately 9 km northwest of the SAC (closest straight-line distance). The Turbine Delivery Route requires habitat removal (other than tree pruning) only at the access point to the site on the N20 (which is within the Redline boundary).</p> <p>There is no ecological connectivity, such as peatland corridors, between the Project Site and the SAC.</p> <p>There is no hydrological connectivity between the Project Site and the SAC.</p> <p>It is concluded that there is no ecological or hydrological connectivity between the Wind Farm Project Area and the SAC.</p>
SPECIAL PROTECTION AREAS		
Kilcolman Bog SPA (site code: 004095)	<p>Whooper Swan (Cygnus cygnus) [A038]</p> <p>Teal (Anas crecca) [A052]</p> <p>Shoveler (Anas clypeata) [A056]</p> <p>Wetland and Waterbirds [A999]</p> <p>According to this SPA's site Conservation Objectives</p>	<p>The Redline boundary of the proposed Project, which includes the grid connection, is approximately 14.1 km north-northwest of the SPA (closest straight-line distance). The Turbine Delivery Route requires habitat removal (other than tree pruning) only at the access point to the site on the N20 (which is within the Redline boundary).</p>

European Site	Reasons for designation (information correct as of 1 st August 2025) (*denotes a priority habitat)	Distance from Project Area and summary of connectivity
	<p>document: Conservation Objectives Series: Kilcolman Bog SPA [004095], Version 1.0, 24th January 2025, Department of Housing, Local Government and Heritage, for each of the listed SCIs, the Conservation Objective is to maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA</p> <p>In recognition of wetland habitat, the Conservation Objective is:</p> <p>To maintain or restore the favourable conservation condition of the wetland habitat in Kilcolman Bog SPA as a resource for the regularly occurring migratory waterbirds that utilise these areas.</p>	<p>There is no ecological connectivity, such as wetland corridors, between the Project Site and the SPA.</p> <p>There is no hydrological connectivity between the Project Site and the SPA.</p> <p>While the improved grassland could potentially support feeding whooper swans, the bird surveys (Chapter 8) recorded only a single whooper swan feeding within the Site on one date (March 2023), one record of a flying bird over the south-west sector of Site (November 2022) and two other records of whooper swans flying off-site. The study concluded that the habitat within the Site is not considered to be of value for whooper swan or any other waterbird species. The study also concluded that there was no evidence of connectivity between the Kilcolman Bog SPA and the Site.</p> <p>It is concluded that there is no ecological or hydrological connectivity between the Wind Farm Project Area and the</p>

7.4. INADEQUATE AA AND EIA:

Others were not properly or adequately assessed at NIS Stage 2 AA. Cumulative effects and in combination effects were not properly or adequately taken into account. Significant adverse impacts cannot be ruled out beyond reasonable doubt on the basis of the basis of the reports submitted with the planning application.

European Site	Reasons for designation (information correct as of 1 st August 2025) (*denotes a priority habitat)	Distance from Project Area and summary of connectivity
	restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.	
Lower River Shannon SAC (site code: 002165)	<p>Sandbanks which are slightly covered by sea water all the time [1110]</p> <p>Estuaries [1130]</p> <p>Mudflats and sandflats not covered by seawater at low tide [1140]</p> <p>*Coastal lagoons [1150]</p> <p>Large shallow inlets and bays [1160]</p> <p>Reefs [1170]</p> <p>Perennial vegetation of stony banks [1220]</p> <p>Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]</p> <p>Salicornia and other annuals colonising mud and sand [1310]</p> <p>Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330]</p> <p>Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410]</p> <p>Water courses of plain to montane levels with the <i>Ranunculus fluitans</i> and <i>Celticchio-Batrachion</i> vegetation [3260]</p> <p>Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) [6410]</p> <p>*Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>) [91E0]</p> <p><i>Margaritifera margaritifera</i> (Freshwater Pearl Mussel) [1029]</p> <p><i>Petromyzon marinus</i> (Sea Lamprey) [1095]</p> <p><i>Lampetra planeri</i> (Brook Lamprey) [1095]</p> <p><i>Lampetra fluviatilis</i> (River Lamprey) [1099]</p> <p><i>Salmo salar</i> (Salmon) [1106]</p> <p><i>Tursiops truncatus</i> (Common Bottlenose Dolphin) [1349]</p> <p><i>Lutra lutra</i> (Otter) [1355]</p>	<p>The Redline boundary of the proposed Project, which includes the grid connection, is approximately 20 km south-southeast of the SAC (closest straight-line distance). The Turbine Delivery Route requires habitat removal (other than tree pruning) only at the access point to the site on the N20 (which is within the Redline boundary).</p> <p>There is ecological connectivity between the Wind Farm Site and the SAC via the River Maigue system.</p> <p>The proposed Project drains to the River Maigue, a main tributary of the River Shannon. The SAC extends to the N69 at Ferry Bridge. Hence, the proposed Project Site is hydrologically linked with the SAC via the River Maigue.</p> <p>It is concluded that there is ecological and hydrological connectivity between the proposed Project and the SAC.</p>

Likewise, the EIA is deficient and inadequate. Biodiversity loss, habitat loss and its impacts have not been adequately assessed. The loss of peat is proposed with no regard for the thousands of species which make up that peatland

The proposed Project drains to the River Maigue, a main tributary of the River Shannon. The SAC extends to the N69 at Ferry Bridge. Hence, the proposed Project Site is hydrologically linked with the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA via the River Maigue. Only the Lower River Shannon SAC and SPA were brought to Stage II..

7.5 PROTECTED SPECIES RECORDED ON SITE

While Annex IV protected species such as otter was recorded along the Charleville Stream and bat activity including lesser horseshoe bat was recorded within the proposed Development Site, no attempt was made to consider these species as Annex IV Habitat Directive species, which is a major lacuna in the assessments.

Similarly, Annex I, Birds Directive SCI species such as Whooper Swan and White tailed eagle were recorded on site during the developer's surveys, yet there has been no attempt to meaningfully engage with the significance of these species

presence from either a Habitats Directive or an Environmental Impact Assessment Directive perspective.

7.6 Several other SAC and SPA sites are within the Zone of Influence based on Source Receptor pathways and cannot be simply ruled out on the basis of an arbitrary 15 km limit which have not been objectively justified. It is unclear why so many European sites have been excluded from AA Assessment.

8 INADEQUATE EIAR:

(i) Likewise, the EIAR is deficient and inadequate. Biodiversity loss, habitat loss and its impacts have not been adequately assessed. Cumulative effects including that of the new Foynes Limerick road has not been assessed. Neither has there been any assessment or proper assessment of the environmental impacts of transport of such large quantities of materials for the wind farm or the health and safety risks of toxic fumes and emissions during transport.

8.2. The pNHAs likely to be affected have not been assessed nor properly assessed.

9. No adequate or proper assessment has been conducted under the Habitats Directive or under the Environmental Impact Assessment Directive of the direct and indirect impacts of the proposed development on ecosystems, species or on European sites. The documentation submitted by the Applicant is inadequate for the Commission to reach a conclusion that no reasonable scientific doubt remains that the proposed development will not have an adverse effect on the integrity of the European sites.

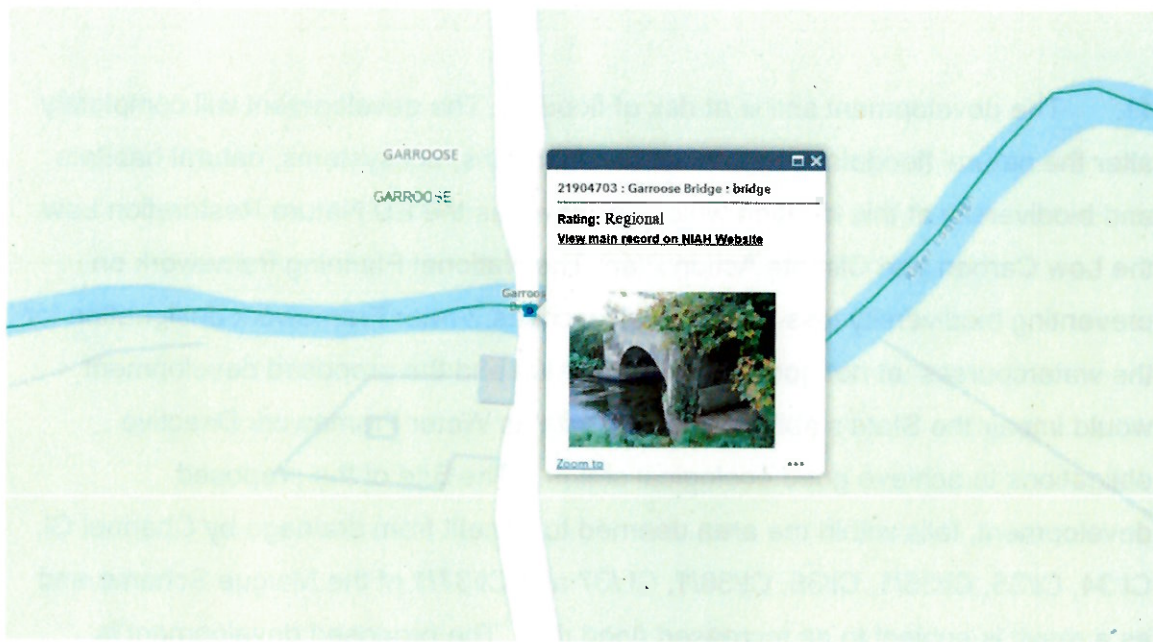
10, The proposed development represents a threat to biodiversity and ecosystem degradation, fragmentation and loss. Furthermore the cumulative and in-combination impacts of such development in the area has not been properly or adequately taken into account in the environmental reports accompanying the application. Neither has the impact on water quality under EU legislation.

11. The development site is at risk of flooding. The development will completely alter the natural floodplain, natural wetlands, drains, ecosystems, natural habitats and biodiversity at this location which contravenes the EU Nature Restoration Law, the Low Carbon and Climate Action Plan, The National Planning framework on preventing biodiversity loss and ecological crises. Water Framework designation for the watercourses at not good ecological status and the proposed development would impair the State's ability to comply with its Water Framework Directive obligations to achieve good ecological status. The Site of the proposed development, falls within the area deemed to benefit from drainage by Channel CI, CI/34, CI/35, CI/35/1, CI/36, CI/36/1, CI /37 and CI/37/1 of the Mague Scheme and as a result is subject to an increased flood risk. The proposed development is environmentally unsustainable and is not in accordance with the proper planning and sustainable development of the area.

12. It is a requirement under the SEA Directive that a Strategic Environment Impact Assessment is required for Policies and Plans including Wind Energy Guidelines. No such SEA was available for either the 2006 Guidelines or the draft 2019 Guidelines.

13. The reports presented are inadequate and incomplete and do not take account of wetland surveys, or bird surveys.

14. The proposed development has failed to take into account national heritage and monuments such as Garroose Bridge and the impacts of construction traffic upon it.



15. For the above mentioned reasons, Environmental Trust Ireland urges An Coimisiun Pleanála to refuse this planning application which poses serious environmental and human health risks, is detrimental to the integrity of the European sites, displays a disregard for biodiversity loss and is contrary to the proper planning and sustainable development of the area.

Environmental Trust Ireland reserves the right to make further submissions in this matter.

For and on behalf of Environmental Trust Ireland.

Environmental Trust Ireland,
C/O Michelle Hayes, Solicitor,
President, Environmental Trust Ireland,
3 Glentworth Street,
Limerick.

APPENDIX – Accompanying PETITION

PETITION TO STOP GARRANE WIND FARM TURBINES

I / We wish to object to the planning application by Garrane Green Energy Limited to construct 9 imposing wind turbines and associated works in the townlands of Garrane, Ballynagoul and Creggane.

The proposed wind farm development will negatively impact the surrounding countryside. The proposed development, if permitted, will cause irreversible harm to the environment, wildlife, human health and residential amenity.

Name:

Address:

Megan O'Regan Garranderk

Conor O'Regan Garranderk

Emma Morrissey Garranderk

Jim Morrissey Garranderk

Patricia Morrissey Garranderk

John Morrissey Garranderk

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Name:

Address:

Mary COTT Cill Rua Bde. Garrane R.

Gerard COTT " " "

John Kelleher, Garrane R., Kilmellock.

Donna Kelleher, Garrane R., Kilmellock

Mike Kelleher, Synan House, Garrane R.

Luke Kelleher, Garrane R., Kilmellock

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Name:

Address:

Megan Helleher, Sycamore House, Garrane, Co. Wick
Mr. Brendan O'Connell, Kilmallock, Co. Wick
Sarah O'Connell, Kilmallock, Co. Wick
Mary Kelly, Garrane, Kilmallock, Co. Wick

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Name:

Address:

Niamh Kellner

Garrane, Bruce

Michael Hogan

Garrane, Bruce

Mary Lynch

Garrane Bruce

David Cusack

Bruce

USND61

Henry James

GARRANDER

John Hall

GARRANDER KILHALLOCK

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Name:

Address:

SUZANNE ONEILL

GARRANE, BRUREE

WILLIAM HOBAN

GARRANE, BRUREE

FRANK HARRINGTON.

GARRANE, BRUREE

Ellen Martell, Garrane Bruree

Seamus & Maire Fitzgerald Garrane Bruree

Michael Mullin Garrane Bruree

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Name:

Address:

Swan Hayes Garrane Deera Glin k

Elish O'Donoghue Garrane

Paul Crotty Garrane

Abibhinn Crotty Garrane Brue

Luke Crotty Garrane Brue

Bunny O'Donoghue Garrane Brue

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Name:

Address:

John Lyons Garrane, Burree

Maureen Lyons Garrane, Burree

Aaron Lyons Garrane, Burree

Sean Lyons Garrane Burree

Jurgen O'Regan (Droim-Atklacc/Burree)

Eileen Crotty Garrane Burree

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Name:

Address:

Andrew Cussey, Garrane Bruce V35 LX57

Liam SELLEY, Garrane Bruce, V35 W214

Seamus W. G. O'Leary, Bruce

Sta Mc Gath, Bruce

Eugene O Shea, Garrane Bruce RT

Mary O Shea, Garrane Bruce

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Name:

Address:

Colin & Mary Clarke

Ballycolly Effin

Kilcuback Co. Limerick

Cabliu Cuha Garraonder

Lydia Behan

Ballycolly Co. Limerick

PAUL HOOPER

"

"

Sheila Monussey

Garrane, Buncra

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Name:

Address:

Kim Barry Ballinacolly Charleville
Co. Limerick

Nigel Barry Ballinacolly Charleville
Co. Limerick

Shane Liddy Garranderk Co. Limerick

Mike Murphy Garranderk Co. Limerick

Elaine + Tommy O'Regan, Garranderk

Ciaran O'Regan, Garranderk

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Name:

Address:

Michael + Mary O'Connell 1 Rte farm, Charleville P56 V635

Anthony Mahony Ballynagoul Charleville

Maebh & Stephen Tushy Ballynagoul Charleville

David Shanahan Graynes Charleville

David Shanahan Graynes Charleville

James Park Ballynagoul

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Name:

Address:

Jennifer Moloney Lisnagree, Charleville, Co-Cork
P56X765

PAUDRAG MULCAHY LISNAGREE, CHARLEVILLE CORK
P56X76

Louise Moloney

Sinead Moloney Lisnagree P56X76

GRACE MOLONEY " "

Elizabeth Moloney " "

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Name:

Address:

David Cussen GARRANE BALLYNAGOUL

Helen Cussen GARRANE BALLYNAGOUL

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Name:

Address:

John Fitzpatrick, Garrane, Bruree, Co. Limerick

Sile de Cléir, Garrane, Bruree, Co. Limerick

Jonathan Fitzpatrick, Garrane, Bruree, Co. Limerick

Fransibarr Fitzpatrick, Garrane, Bruree, Co. Limerick

Sebastian Fitzpatrick, Garrane, Bruree, Co. Limerick

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Name:

Address:

Thomas Ward Garrinderk, Kilmallock Co. Limerick

Galatine Greaney Garrinderk Kilmallock Co. Limerick
