

Inchacooly,
Monasterevin,
Co. Kildare
W34N259
Date: 29/03/26

Subject: OBSERVATION / OBJECTION TO PLANNING APPLICATION

TO: An Coimisiún Pleanála – Case Reference: PAX09.324055

Proposed Wind Turbine and Associated Grid Infrastructure Development

Location: Derrylea, Inchacooly and surrounding townlands

Applicant: Dara Energy (as per application documentation)

To whom it may concern I am lodging a formal objection to the above proposal and detailing my reasons below.

1. Introduction and Standing

I wish to lodge a formal objection to the above-referenced planning application (PAX09.324055) submitted to An Coimisiún Pleanála.

This objection is made on the grounds of many concerns, not least that the proposed development would give rise to unacceptable environmental, hydrological, flooding, infrastructural, and community impacts, and one major one in my opinion is that it fails to comply with the national and European environmental legislation, most notably the European Union Habitats (River Barrow and River Nore Special Area of Conservation) Regulations 2024 (S.I. No. 648/2024) due to the development's proximity to a tributary river and well recognised and documented flood zone.

2. Statutory and Legal Context – River Barrow SAC

The River Barrow and River Nore are now formally designated Special Areas of Conservation (SACs) under Irish law by S.I. No. 648/2024, which gives domestic legal effect to Council Directive 92/43/EEC (the EU Habitats Directive).

Under these Regulations and Article 6 of the Habitats Directive, the planning authority is legally obliged to ensure that:

Any project likely to have a significant effect on an SAC is subject to Appropriate Assessment

Planning permission may not be granted unless it is ascertained, beyond reasonable scientific doubt, that the project will not adversely affect the integrity of the SAC

Indirect effects, including impacts on hydrology, flooding regimes, drainage, and catchment-wide water movement, must be fully assessed.

The proposed development, by the applicant's own documentation, involves construction works in close proximity to the River Barrow, including trenching, horizontal directional drilling, forestry clearance, and heavy construction traffic. Accordingly, it falls squarely within the scope of these statutory protections. The documentation makes efforts to detail the flood events in the area and has by its own admission suggested that the development there may further impact flooding levels to the tune of 150mm referenced in their Derrynadarragh EIAR | EIAR Volume iii | Appendix 12 | page 44 of 46 | section 9 | box 5.1.2 and suggesting that this is within acceptable OPW guidelines.

Observation: In my view and experience any increase is not justifiable nor acceptable as the impact to wildlife and residential is already at a tipping point. I also would question their statement about being within OPW acceptable limits and I wouldn't hesitate to suggest that this statement is generic from the OPW's perspective and far from being an established measure in this specific case.

3. Flooding Risk – Failure to Address a Known and Material Constraint

3.1 Existing Flooding Conditions

The application documentation acknowledges that the local area is already subject to regular and recurring severe flooding, including flooding of local roads, adjoining lands, and access routes.

Flooding is therefore not a hypothetical concern but an established baseline condition which must be treated as a critical environmental constraint. Since 2016 I have documented evidence of supplying the local authorities with photographic detail of the scale of the flooding to local roads and surrounding farm lands and subsequently in 2019, 2021, 2023, 2025 and lastly in February of this year in 2026 where I've engaged with our local TD to try to resolve this issue.

Video footage that evidences the catastrophic flooding that has visited the locality in at least six occasions in the past two decades can be seen here:



This footage also featured in Limerick Leader national newspaper:

Windfarm weather warning as location prone to flooding

■ Drone footage shows proposed site for nine-turbine development under water

NICK RABBITTS

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LIMERICK City and County Council's environmental scientist Simon Jennings has recommended a major wind farm development be refused permission by An Coimisiún Pleanála.

It comes as new drone footage reveals the site where the development is planned, to be prone to flooding.

Garrane Green Energy is seeking planning permission to develop nine wind turbines towering up to 170 metres high on a vast tract of land in the south of the county.

The project, located between Bruree and Charleville, has already sparked huge opposition locally.

And videos of the land, where the wind farm is planned, reveal it to flood easily, with Independent Ireland councillor John O'Donoghue pointing out its access to the nearby N20 road was under water.

"Our own council has signs up. We can't stress enough this is not a site suitable for this," said the Adare-Rathkeale councillor.

Due to the size and scale of the project, a decision on the development will bypass local planners and be decided by the national planning authority in Dublin in the new year.

But the local authority has made its own submission, and held a special meeting to discuss the project.

As well as the recommendation of Mr Jennings to refuse, council planners also raised concern over the visual impact on several archaeological sites within the area, as well as a number of protected structures.

"Given the height and scale of the turbines as proposed, there are concerns that the development would have a negative impact on landscape and visual impact, both locally and over greater distances from houses, roads, villages and amenity locations," the council's



Drone footage captures flooding at the proposed site of a windfarm between Bruree and Charleville, which Cllr John O'Donoghue calls 'totally unsuitable'

planning authority stated in a briefing to members.

Cllr Greg Conway, Fine Gael, said: "It is on a flood plain, and it floods every year. Most of that land is only fit for farming. If you're lucky you will get nine months, but it's normally only six months of the year."

Cllr PJ Carey, Sinn Féin, added he is concerned the building of the wind farm will "create a no-go area" for housing in that part of Limerick.

Cllr Eddie Ryan, Independent, said the quality of life for people already living near the site "will be changed for the rest of their lives, and for future generations."

In a statement, a spokesperson for Garrane Green Energy said its proposals will actually help tackle flooding in the future.

They pointed out flooding has been identified as one of the most urgent risks to be addressed.

"The increase in frequency and

severity is directly linked to greenhouse gas emissions and fossil fuel use. The proposed Garrane Green Energy project will harness Ireland's great wind resource, enabling a move away from fossil fuels," they say.

As part of the planning application, the firm has pointed to a flood risk assessment, and added the design of the project contains "robust flood resilience measures."

Separately, a planning application

for a wind farm in Coolcappa has been deemed invalid by council planners.

Unlike the development in south Limerick, these plans will initially be decided by local planners.

Initially, 413 submissions were lodged in response to the planning application - the vast majority opposing the proposals.

The company behind this project, Ballynisky Green Energy, declined to comment.

And also this recent photograph from a local farm adjacent to the proposed site for the turbines:



3.2 Increased Flood Risk Arising from the Development

The proposed works include:

Extensive deep trenching along narrow rural roads

Horizontal Directional Drilling (HDD) in proximity to the River Barrow

The importation and placement of large volumes of concrete and hardcore

The removal of over 10 hectares of forestry and mature vegetation, which currently plays a role in water attenuation and soil stability

These interventions present a clear risk of altering groundwater pathways, drainage capacity, soil permeability, and surface water runoff patterns, with the foreseeable consequence of:

Raised local water tables

Increased frequency and severity of flooding

Slower flood recession times following rainfall events

Riparian habitats demise

Water quality and sedimentation levels

Protected species dependent on stable hydrological conditions

The removal of forestry and hedgerows further compounds these impacts by reducing biodiversity, habitat connectivity, and natural flood resilience.

Under S.I. No. 648/2024, any deterioration of hydrological conditions affecting the SAC — whether direct or indirect — is expressly prohibited.

The development may also add to dire annual local road flooding in this area, one which Loais county council have failed to address or resolve to date, see photographic evidence taken this year on 13th March 2026 from outside my house at w34N259:



3.3 Inadequacy of Assessment

The application fails to demonstrate, with sufficient scientific certainty, that:

Flooding risk will not be worsened locally or downstream

Construction activities will not interfere with natural drainage systems

The integrity of the River Barrow SAC hydrological regime will be protected

This represents a failure of Appropriate Assessment and, in itself, constitutes sufficient grounds for refusal under EU and Irish law.

4. Road Closures and Community Safety

4.1 Extent of Proposed Road Closures

The applicant's own Traffic Management documentation confirms that multiple local roads will be closed for extended periods, including:

L71761

L71765 / L70351

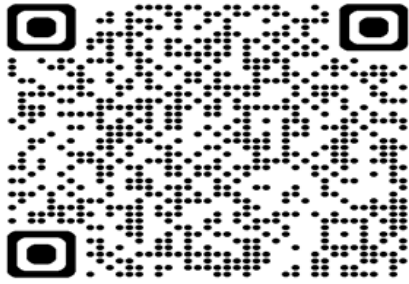
L71764

L70481

Closures are proposed on a rolling basis, with one-way systems, restricted access to homes and farms, and works taking place six days per week.

Calculation impact if enforced cites as being significant:

- **+882 km/week per family (school runs, social events, work travel, etc)**
- **+15 hours/week extra travel time which equates to ~60hrs increase in journey times per month.**
- **+4,000 km/month extra per family**
- Farmers face massive detours (**up to 80 km**) for cattle, hay, slurry, and silage transport
- Emergency access concerns if re-directed scenarios for medical emergencies and animal welfare
- Horse riding, farming, and rural activities severely impacted
- Proposed Brownway for tourists and cyclists, by Kildare CoCo.



- Silage season and heavy farm machinery presents added complexity
- **84 trucks/day** meet local traffic on narrow roads — **23,000 truck (cumulative) over build period. That's a truck every 6 minutes all going well and with no delays.**
- Additional traffic from construction staff and nearby housing developments will worsen congestion
- Locals with turbary rights cannot access vital sessional turf harvesting easily
- Increased traffic forced back into Portarlinton which is already under great traffic strain and congestion issues.
- **Noise, Disturbance & Safety Risks Near Homes**
- **HDD Drilling & Heavy Machinery**
- Loud drilling, vibration and construction noise will occur near homes in **Inchacooly and Derrylea**
- Works may operate early in the morning and for prolonged periods — **Monday through to Saturday – 7am to 7pm**
- Air quality negative impact due to construction and associated heavy vehicle traffic.

4.2 Roads: Compound Risk During Flood Events

Many of the roads proposed for closure are already vulnerable to flooding. The interaction between:

Flood-prone infrastructure

Prolonged road closures

Heavy construction traffic

creates a serious risk of community isolation, particularly during periods of heavy rainfall.

Public safety during extreme weather events

Such indirect impacts are explicitly relevant under the Habitats Regulations and must be assessed as part of the overall environmental effect of the project.

4.3 Disproportionate Burden on the Local Community

The applicant's documentation indicates that residents will experience:

Substantial detours resulting in significant additional travel time

Increased fuel and transport costs arising from the metrics provided above.

Severe disruption to farming operations, school travel, employment, and essential daily activities

This level of disruption is grossly disproportionate in a rural setting and undermines the principles of proper planning and sustainable development.

5. Impact on Wildlife

Hen Harrier Feeding Areas and Curlew nesting grounds

The **Hen Harrier** is a protected bird under the **EU Birds Directive** and is a qualifying species in the **Slieve Bloom Mountains SPA (Laois/Offaly)**.

The species commonly **forages up to 5 km from nesting areas** — which includes our lowland fields around **Inchacooly, Derrylea, Lea and Clonanny**.

Construction noise, tall structures and lighting may disturb this **sensitive, endangered species**.

A breeding pair of Curlew have been observed over the past number of years within 1km of the proposed development and this protected species have been given special sanctuary by a local farmer and this needs to be preserved.

5. Conclusion and Request

In summary, the proposed development under : **PAX09.324055**

Fails to comply with the European Union Habitats (River Barrow and River Nore SAC) Regulations 2024

Does not adequately assess or mitigate flooding and hydrological impacts

Creates unacceptable risks to community safety, access, and emergency response

Imposes disproportionate and prolonged hardship on the local rural community

Fails the precautionary principle required under EU environmental law and has inadequate consideration for the wildlife and its habitats of this precious landscape.

For these reasons, I respectfully request that An Coimisiún Pleanála refuse planning permission for this development.

Signed:

Paul Gillen

A handwritten signature in black ink that reads "Paul Gillen". The signature is written in a cursive style with a large initial 'P' and a long, sweeping underline.