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An Coimisiún Pleanála - Case reference: PA03.320705

From the website referenced above the project is not in County Limerick. It is County Clare. Court Co. Limerick seems to be an add on.

My issues are already too well known and documented

1. Peat Stability

"8.3.8.5 Peat Stability - Site Walkover Surveys and Investigations FT completed detailed site surveys and walkover inspections of the Wind Farm Site from 7th to the 9th June 2023. The observations made during the site surveys were supplemented by observations recorded by MKO and HES during separate walkover surveys. During these site walkover surveys a total of 569 no. peat probes were completed. Intrusive site investigations comprising 13 no. trial pits and 3 no. boreholes were also completed by IDL under the supervision of FT. The findings of the walkover surveys and intrusive site investigations are as follows**: The Wind Farm Site is covered in a layer of thin peat (0 – 3.9m) with undulating terrain open peatland."**

Inland Fisheries Ireland (IFI) "We are concerned about soils, their structure and types around all the turbines, turbine pads, associated access roads and site development. In particular we have concerns about the stability of the soils and the impact that works on both the turbines and access roads may have either directly **or by vibration on the stability of the soils**. IFI are particularly concerned where it is proposed to construct wind turbines on peat soils especially if these peat soils are located on upland areas. This would appear to be the case in the current application. Extra caution will be required to prevent deleterious discharges to waters" Section 8.3.8 & 8.5.2.5

Vibration was not addressed at all. Instead, An analysis of peat sliding was carried out at the main infrastructure locations across the Wind Farm Site for both the undrained and drained conditions. The purpose of the analysis was to determine the Factor of Safety (FoS) of the peat slopes. They looked at peat and the effects of rainfall, which we already know, instead of addressing the concern of **vibration** on wet soils.

The primary documented ways that wind farms impact protected peat ecosystems include:

Hydrological Disruption: Peatlands require a high water table to form and accumulate carbon. Excavations, drainage ditches, and compacted access roads can act as wicks, lowering the water table over an area that stretches far beyond the actual turbine footprint. This causes the peat to dry out and decompose.

Carbon Emissions: Excavating thousands of cubic meters of peat for turbine bases exposes the carbon-rich soil to oxygen. Studies show that for developments on deep, intact peat, the emissions from the damaged soil can offset or exceed the clean energy carbon savings for many years.

Landslide & Erosion Risks: Building heavy infrastructure on unstable peat soils increases the risk of catastrophic bog slides, which can devastate local ecosystems and pollute nearby waterways with sediment.

Habitat Fragmentation: Building roads and trenches divides continuous bogs into smaller, less stable ecosystems, often causing sensitive upland bird and plant species to abandon the area.

In response to these environmental issues, modern best practices and strict planning guidelines are heavily enforced. Developers often aim to site turbines on shallow or already degraded peat, utilize

"floating roads" to prevent deep digging, and submit extensive Peatland Carbon Calculator assessments to ensure the project yields a net environmental benefit.

2. Bedrock and aquafers

The proposed development in on a site that is primarily rock mostly covered with peat. From the application "The length of the hydrological flow path between the Wind Farm Site and the SAC is ~15km (via the Blackwater River and its tributaries which drain the Wind Farm Site). This is extremely close and is a major buffer for the river Shannon". "By protecting all watercourses in the vicinity of the proposed works areas, the qualitative status of all downstream watercourses, and associated designated sites, will also be protected". These statements show a clear underestimation of how significant and complex water systems are.

There is no mention of 'aquafer' in the entire document yet, 34 pages are allocated to traffic. This shows a complete lack of focus on real destructive issues.

As the bedrock is connected to all the farms and house constructions, vibration and subliminal noise should be high on the defence of the investor's agenda. There is nothing!

3. Flight Paths

To stand at the proposed site and watch planes entering Shannon airport is a hobby of many of us. Planes land at Shannon via the east and leave over the sea to the west at heights much lower than the investors turbines. A degree or two off course could see a fatal accident. A simple graph could be created to look at the height planes enter Shannon at the distance from the mountain. The proposed giant turbines are 180m on top of the mountain (300m), i.e., almost half a kilometre.

Amazingly, There is no mention of flight paths in the response.

4. Hen harrier, curlew and other protected habitats.

> "Hen Harrier Enhancement Measures 3.1.1 Identification of Lands Alternative lands were sought within 2km of the 2023 hen harrier nest location (within the Wind Farm Site) by carrying out a desk-based review of available maps and aerial photography in conjunction with liaison with the land agent, project manager and other members of the project team. The desk exercise focussed on identifying lands that are not currently suitable for foraging hen harrier or that may currently be marginally suitable but can be improved through changes in land management"

The presence of hen harriers and other protected species is well documented including, in the initial proposal. The response is that they are admitting that the hen harrier is a significant legal reason why the development was poorly thought out and should not go ahead. The solution is laughable. They looked for a replacement site that could be improved by changes in land management. *Maybe put a sign for endangered species to relocate to the desk based reviewed site.*

5. Gortacullin Bog NHA (Natural Heritage Areas)

> "3.1.6.8 Impacts on Gortacullin Bog NHA Observations state that Gortacullin Bog NHA is located approx. 1.1km from the Proposed Development, and that the minimum distance between the NHA and infrastructure should be 10 times the blade diameter. The potential for impacts to the NHA has been fully assessed within the Biodiversity Chapter of the EIAR as submitted. The potential pathways for impact on this NHA include hydrological impacts as a result of excavations, and impacts as a result of forestry felling works. However, these pathways have been fully assessed, and mitigated where required, in Section 6.4.5.1.2 of the submitted EIAR. It has been found that there is no potential for residual significant effect on Gortacullin Bog NHA."

The response. "There are areas adjacent to the study area which comprise upland blanket bog (PB2), including Gortacullin Bog NHA which is adjacent to the northern boundary. Smaller areas of upland blanket bog, cutover bog (PB4), wet heath (HH3) and dry heath (HH1) are present within the study area." Is all that I can find,

6. Wasting time with irrelevant material

Appendix 2.1 Scoping responses consists of 203 pages of emails!

7. Conclusion

My issues are well documented and obvious. It is irresponsible to put giant turbines on blanket peat bogs. The investors paid no attention to the fact that the entire area is on solid rock with a few meters of fragile peat. The area is a significant contributor to the Shannon catchment and Limerick city. It is adjacent to the flight path of incoming planes to Shannon airport. The area is a home to internationally legally protected wildlife, like the hen harrier. To say that they have provided alternative accommodation is not helpful and dilutes any seriousness of their authenticity and concerns for our living world.

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