Case Reference PAX91.323635 Submission Bruff Dromin Athlacca – Ballinlee Community Action Group

Bruff Dromin Athlacca – Ballinlee Community Action Group
Ballinrea
Bruff
Co. Limerick
V35XP48

The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902
Submission On Case Ref: **323635-25**

Date: 31st October 2025

Re: 9 no. wind turbines, grid connection and all associated site works. Located in the townlands of Garrane, Ballynagoul, Creggane and Charleville, Co. Limerick

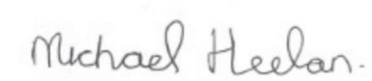
To Whom It May Concern,

We, Bruff Dromin Athlacca- Ballinlee Community Action Group write in connection with the above listed planning application at Garrane, Ballynagoul, Creggane and Charleville, Co. Limerick., An Coimisiún Pleanála - Case reference: **PAX91.323635** to construct 9 no. wind turbines, grid connection and all associated site works.

We support renewable energy and the move toward clean energy in principle we have strong reservations about how health, heritage, visual and ecological concerns are handled in the application, along with compliance to international and EU environmental obligations.

We respectfully submit our observations and objections on the attached pages and request that the Board give full consideration to the matters raised. We firmly believe that the issues outlined constitute substantive grounds for refusal of this proposed wind farm development.

Kind Regards,



On behalf of the Committee of the
Bruff Dromin Athlacca Ballinlee Community Action Group

Contents

Executive Introduction

We wish to object to the proposed Garrane Wind Farm and respectfully request that the Board refuse planning permission for this development. The grounds for our objection are set out in detail in this submission and can be summarised as follows:

- The characteristics of the site being in a poor wind area as per the SEAI Wind Atlas making it unsuitable for industrial scale wind turbines
- Visual and cultural impact on the character of the historical area in an area known as the Golden Vale
- Insufficient cumulative assessment between Garrane and Ballinlee Windfarms despite clear views of notable views and prospects Lough Gur and Ballyhoura, with no intervening terrain between the two sites, and assertion that there is very low potential for intervisibility is inaccurate
- Breach of RED III EU Directive, the National Landscape Strategy, Limerick Local Development Plan 2022 – 2028 and SEA Directives and EIA Directives
- Failure to cumulatively assess the project alongside the Ballinlee Wind Farm CASE Ref 323780
- Premature application given the current Wind Energy Zoning for Limerick City and County has been "blocked" from review and amendments based on Circular CL 20-13 in 2013 instructing local authorities to refrain from amending existing Development Plan policies related to Wind and Renewable until a focused review of the 2006 guidelines
- Redacted Legal agreements appended to the Garrane Green Energy Planning Authority Portal show that agreements were drafted and signed in 2021, but the applicant Garrane Green Energy was only set up on Friday the 5th of May 2023 (www.solocheck.ie/Irish-Company/Garrane-Green-Energy-Limited-740479)

Regulatory Context and Guidance

- **European Landscape Convention (ELC)**
  Ireland signed the European Landscape Convention (ELC), also known as the Florence Convention on 22 March 2022, which came into effect on the 1 March 2024. The ELC defines landscape as *'an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors*' (Council of Europe, 2000). With Irelands adoption of the ELC, the Government created **the National Landscape Strategy 2015-2025** to ensure it remains in compliance with the ELC. The strategy seeks to establish principles to protect and enhance the landscape, enhancing it while positively managing its change. It is a high-level policy framework that seeks to achieve balance between the protection, management and planning of the landscape by way of supporting actions.

- **The National Landscape Strategy 2015-2025** is not referenced within the application /EIAR or Limerick County Development Plan. Wind energy proposals should be evaluated within the context of the local landscape character, not just technical or economic criteria. It is a critical omission not to refer to this strategy in determining site suitability

RED III Directive

- Case 323635-25 has been lodged as a RED III Directive1. This directive required Ireland to have completed by 21 May 2025 a mapping project to identify areas suitable for renewable energy development and to adopt by 21 February 2026 plans within these areas designating renewables acceleration areas. Ireland did not achieve the requirement to complete a National Territory Mapping. It rather put this out of Public Consultation in October 2025, with a Map drafted from existing areas as currently designated by Local Authorities for renewable energy.
- It would be premature to grant permission, at least until it is established whether the development site is within the scope of RED III, given that the developer places such reliance on it.

SEA Directive

- A plan or programme which sets the framework for future development consents must be subject to strategic environmental assessment (SEA).

- The concept of "sets the framework" relates to any measure which establishes, by defining rules and procedures for scrutiny applicable to the sector concerned, a significant body of criteria and detailed rules for the grant and implementation of one or more projects that are likely to have significant effects on the environment.

- Guidelines must be subject to SEA if they are capable of producing compulsory legal effects for third parties in contrast to measures which contain provisions of a purely indicative value. Guidelines adopted under section 28 of the 2000 Act are binding on

planning authorities when making a development plan by virtue of Section 28(1A) and 28(1B). In addition, SPPRs incorporated in guidelines are clearly binding.

- It is contrary to the SEA directive to apply a plan or programme which sets the framework for development consents under the EIA Directive which was not adopted using the SEA Directive procedure.

- The 2006 Wind Energy Guidelines were not subject to SEA and are therefore inapplicable.
- The 2019 Draft Revised Wind Energy Guidelines are irrelevant as a matter of Irish law and in any event the conclusion of the SEA remains pending. Therefore, these guidelines are also inapplicable.
- It would be contrary to the SEA Directive for the Board to grant permission for the proposed development

Wind Energy Guidelines and Noise

The wind energy Guidelines 2006 are seriously out of date which has been confirmed and acknowledged by Government Ministers and widely criticised. In respect of health protection, these guidelines assess Noise and impacts on outdated assessment criteria that has been internationally dispelled by Noise Experts. The use of ETSU_97 (now over 30 years old) cannot assess low-frequency noise. Its assessment methodology is flawed as the applied A-weighted sound levels are not adequate or fit for purpose, to assess ILFN acoustic pollution propagated by wind turbines. ETSU-R-97 and the IoA Good Practice Guide, 2013 are both deficient and currently under review and should not be relied upon for determining or assessing meaningful and acceptable noise limits for operational wind farms.

The EIAR concludes that no adverse health effects are expected, citing international reviews that downplaying physiological harm from infrasound or low-frequency noise. There is now scientific evidence that wind turbines can emit infrasound spreading at least 10 km, at levels proven to affect humans. People exposed to this kind of infrasound often report pressure sensations, anxiety, migraines, dizziness, sleep deprivation, and chronic fatigue. *(Mattsson, K. (2025, October 8). Separating myth from fact on wind turbine noise [Lecture transcript]. Copenhagen, Denmark: Uppsala University.)*

Visual Impacts

Visual Impact – Golden Vale

The proposal to install nine industrial-scale wind turbines within the low-lying agricultural landscape of the Golden Vale raises serious concerns. To date, wind farms have predominantly been located on elevated terrain, and this shift toward development in flat, productive farmland represents a significant departure from established siting practices.

The Golden Vale for the readers of this document who may not be aware, refers to a historic agricultural region in the province of Munster, spanning parts of County Cork, County Limerick and County Tipperary. It is regarded as some of the most fertile farmland in Ireland, famed for dairy production. The region is celebrated not just for scenery but for its farming heritage and local produce, making it ideal for slower, “taste of place” type visits

For tourism, it offers scenic drives, countryside views, and pleasant rural stops. It is strongly promoted by Ballyhoura and Failte Ireland.

Figure 1: From VisitBallyhours.com

The Golden Vale Drive takes in the villages and towns of Kilmallock, Bruree, Bruff, Croom, Lough Gur, Ballyneety, Pallasgreen, Emly, Galbally, Kilfinane and Ballylanders.

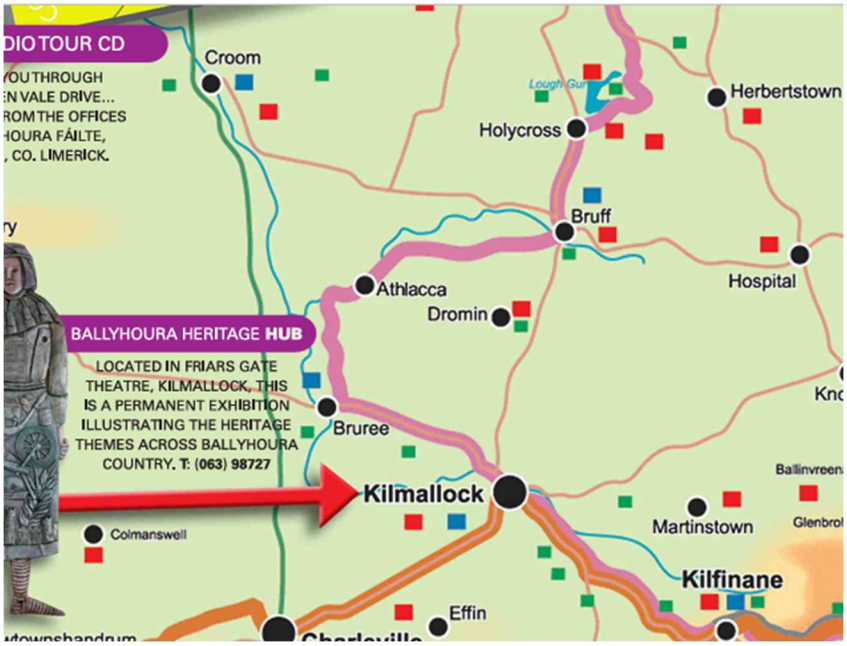


Figure 2: Golden Vale Heritage Brochure

Figure 3:Snapshot from VisitBallyhoura.com - Golden Vale Drive - Lough Gur

The proposed wind farm is to located in the Scenic Drive and surrounding countryside that is renowned for its rolling green pastures, patchwork fields, and gentle hills , a quintessential example of the Irish rural landscape. The Golden Vale, one of Ireland's most iconic and visually treasured regions, would be irreversibly altered by the installation of nine wind turbines, each standing approximately 170 metres tall.

Cumulative Impacts – Visual

Concurrent to the application the Garrane Wind Farm, is another large wind farm proposal by the applicant Ballinlee Green Energy. It is important to state that both the Garrane and Ballinlee Wind Farms are owned by the parent company Greensource, based in Adare, Co. Limerick.

The distance between Garrane Wind Farm T9 is just 7.9km from the nearest Turbine from Ballinlee Wind Farm.

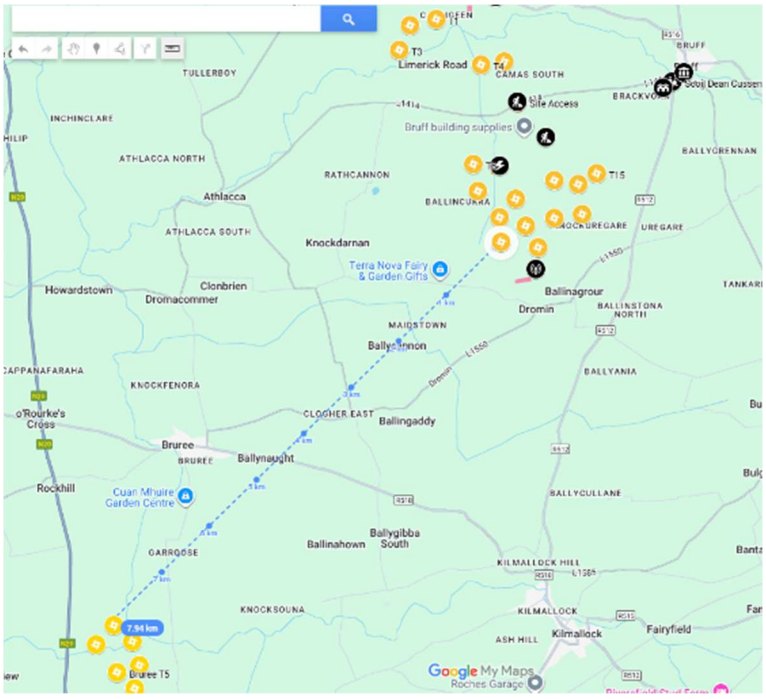


Figure 4Distance from Garrane Wind Farm to Ballinlee Wind Farm

Garrane Wind Farm is proposed for an area Southwest of the Ballinlee Wind Farm, which proposes to build 16 nr 160m and 1 nr 150m tall Wind Turbines also in the Golden Vale.

The cumulative impact in proposing this project in addition to Ballinlee Wind Farm places an increased visual impact across the Agricultural lowlands which will have a significant impact on our Natural Heritage and unbroken views from the many elevated viewing areas, such as Ballyhoura.

Ballinlee Wind Farm	Proposed	17	c. 7.7km	Northeast

Contraventions to the Limerick Development Plan:

There are numerous contraventions in Limericks 2022 – 2028 Development Plan which are against the proper planning proper planning and sustainable development of the area. Below, several key issues are listed *(note: this is not an exhaustive list)*.

1.3 Strategic Objectives

> **8.** *Protect, enhance and connect areas of natural heritage, green infrastructure and open space for the benefits of quality of life, biodiversity, protected species and habitats, while having the potential to facilitate climate change adaptation and flood risk measures.*

> ***10****. Support growth in the tourism sector in Limerick, specifically focusing on sustainable tourism, and capture key opportunities to develop the sector based around five key drivers – Greenways, Waterways, Activities, Heritage, Arts and Culture, in an urban and a rural environment.*

> ***6.4 Landscape and Visual Amenity 6.4.1 Landscape Assessment and Landscape Character Areas:*** *Limerick possesses a varied landscape which is important not just for its intrinsic value and beauty, but also because it provides for local residents and visitors, both in terms of a place to live and for recreational and tourism purposes. The importance of landscape and visual amenity in the role of planning is recognised in the Planning and Development Act 2000 (as amended). The Act require that Development Plans include objectives for the preservation of the landscape, views and prospects. It requires objectives for Landscape Conservation Areas, Areas of Special Amenity and also for the assessment of landscape character. This approach towards landscape issues based on the Draft Landscape Character Assessment Guidelines stresses the distinctiveness of differing kinds of landscape and how differing kinds of development can best be integrated within them."*

LCA. 05 Lough Gur

There will be a severe visual impact on Lough Gur with the placing of 9 x170m tall wind turbines in the direct viewing path from where over 100, 000 visitors come to take in the breathtaking views annually. Lough Gur is protected within the Limerick Development as per extract below.

"The area around Lough Gur, with its pleasant rural setting and views of the lake and its well developed hedgerows, is also an attractive amenity and is widely used by locals and visitors alike. "

LCA 05 Lough Gur	Lough Gur is one of the most significant archaeological site in Limerick. Topographically it is made up of a series of rolling hills surrounding the lake, which is the centre point of the area. The landscape is pastoral with a long history of human habitation. The presence of a wide variety of archaeological monuments is one of the characteristic features of the area. The area around Lough Gur, with its pleasant rural setting and views of the lake and its well-developed hedgerows, is also an attractive amenity and is widely used by locals and visitors alike.	a) Safeguard the visual amenity of the area and to have regard to the views and prospects in and out of Lough Gur. b) Restrict development including residential development in the area of Special Development Control, shown on Map 6.3 except in exceptional circumstances. Appropriate tourism development and extensions to existing properties, which respect the special character of Lough Gur will be considered. c) To have regard to the archaeological importance and richness of the area indicated on Map 6.3 as a zone of archaeological amenity. Any developments within the zone will be required to provide for an archaeological examination during the course of excavations, or other ground disturbance. d) To safeguard the existence of Natural Heritage Areas and the Wildfowl sanctuary when assessing applications for development in the area.

The Views and Prospects from Lough Gur are protected under **Objective EH 031** within the plan:

*"**Objective EH O31** Views and Prospects It is an objective of the Council to: a) Preserve, protect and encourage the enjoyment of views and prospects of special amenity value or special interests and to prevent development, which would block or otherwise interfere with views and/or prospects. b) In areas where scenic views and prospects are listed in the Plan, there will be a presumption against development, except that required to facilitate farming and appropriate tourism and related activities. The development must be appropriately designed so that it can be integrated into the landscape"*

170m tall wind turbines along with further wind farm developments such as Ballinlee and more in planning cannot be integrated into the landscape.

The photomontage from the EIAR confirms this quite clearly.

Figure 5: Lough Gur Viewpoint Ref: VP21 - Garrane Photomontages

The image was taken from the Lough Gur visitor site.

Figure 6:ITM 564632; 641604 VP where image was taken

The cumulative issue is particularly demonstrated by this image in the knowledge that a further 17 x 160m Tall Wind Turbines are being planned to sit directly in front of the Garrane Wind Turbines.

There is a noticeable lack of proper planning with how both windfarms have been designed. It is not an excuse to say that the applicant was unaware, it is the very same developer that has planed both concurrently yest failed to make any significant evaluation of the visual impacts on Lough Gur, one of the most significant archaeological sites in Ireland.

Draft 2019 Guidelines emphasise, several rules, objectives, and constraints which would affect whether a turbine proposal is appropriate in such a terrain as the low-lying Golden Vale.

The Guidelines emphasize assessing landscape and visual impact carefully. Proposals must demonstrate how turbines will integrate into the landscape, considering scale, form, skyline, horizon, and cumulative impact. There is no ability for these developments to integrate into the landscape. The implication for both Garrane (and Ballinlee Wind Farm) is that these turbines are more visually dominant. Turbines towering over flat terrain are more conspicuous.

LCA O4 Knockfierna

On a good day, Knockfierna has the most amazing views of Limerick north and south, Clare, river Shannon, Ardnacrusha, Tipperary, Ballyhouras, North Cork, aswell as Charleville, and back to Kerry. On a really good day, you can spot Carrauntoohil. As per our Limerick Development Plan, the views from Knockfierna are protected:

> *"This is one of the most dominant hills in the centre of Limerick. The vegetation cover of the hill is generally upland grassland with a well-developed field boundary system. The hill is important not just for its scenic value, but also because of the variety of archaeological and historical sites that exist on it."*

Knockfierna offers a panoramic view of most of the county, due to its central location. You can see the Golden Vale, a fertile agricultural region. These protected views will be negatively impacted by both Garrane and Ballinlee Wind Farm, the cumulative impact of both windfarms and their irregular spacing causing further in

Lack of Ecology and Ornithology Cumulative Assessment

When assessed cumulatively at a national ecological scale, the combined impact of the Ballinlee and Garrane wind farm projects on bird populations, particularly Whooper Swan (Cygnus cygnus)is likely more significant than acknowledged in the developers' EIARs.

Both reports largely downplay cumulative impacts by focusing on localised site boundaries and treating each project's Zone of Influence (ZoI) independently. However, Whooper Swans are highly mobile migratory species protected under Annex I of the EU Birds Directive, relying on a network of interconnected roosting and foraging sites across Ireland.
The Ballinlee and Garrane sites sit within this broader midwestern flyway corridor linking the Shannon Callows, Lough Gur, and the Maigue catchment, all of which support nationally important wintering flocks.

While each project individually reports low predicted collision mortality and limited disturbance, when considered together—and in the context of the rapid expansion of wind energy infrastructure across the Limerick–Cork–Tipperary region—the cumulative risks of displacement, barrier effects, and collision mortality increase materially. Repeated turbine exposure along the species' flight paths can fragment traditional routes and reduce access to key feeding wetlands, forcing birds to use suboptimal areas, with long-term consequences for energy budgets, survival rates, and breeding success in Icelandic populations.

Moreover, reliance on avoidance rate assumptions (typically ≥99%) in collision risk models introduces a systematic bias toward underestimating effects. Empirical evidence from Northern Europe suggests that Whooper Swans exhibit cumulative displacement from turbine clusters even when collision rates appear low. Therefore, from a national conservation perspective, these developments contribute to an incremental but measurable degradation of Ireland's capacity to support its Annex I migratory swan populations, constituting a significant cumulative impact inconsistent with the Birds Directive's requirement to maintain or restore populations to favourable conservation status.

Limerick Development Plan - Wind Map 9.1

There are numerous conflicts between the Preferred Areas for Onshore Wind Energy Zoning and Limerick City and County 2022 – 2028 Written Statement. The Development Plan Status "*In the event that any conflict or ambiguity arises between the Written Statement and supporting maps, the Written Statement shall take precedence"* (page 11 of the plan). This is logical but poses issues for communities that are targeted for Industrial Wind Energy Projects by Developers in areas unsuitable for Industrial Wind Turbines. This leads to lengthy planning applications, appeals, and in some cases Judicial Reviews.

It is clear from looking at the zoning within the **2022-2028 LCCC Development Plan**, that the Agricultural Lowlands area (coloured in purple) has been taken from *Map 6.1 Landscape Character Assessment (appended)* and it appears this area was crudely applied to the Wind Energy Zoning map to form *Map 9.1 Wind Energy Locations* preferred area. This unscientific broad stroke approach contrasts to bordering Local Authorities Cork and Tipperary that have clear designations in their Development Plans that assess.

For instance, within the Cork Development Plan (appended), much detail and consideration is given to the importance of the Landscape. In the opening preamble of 13.6 Wind Energy, it states the important or high value landscapes. High Landscape Value and Medium Landscape

Value distinctions are made. Cork categorises The Golden Vale as “Very High Landscape Value.

Our observations are that there is a distinct lack of credible evidence to confirm that this site is a “preferred site”, other than by referring to a zoning in the Local Development Plan (see Appendix 2 Map 9.1).

We draw your attention to the letter dated10th October from Mayor of Limerick John Moran to the Department of Climate., Energy, and the Environment, in response to the National Territory Mapping as par to the EU RED III Directive. This correspondence offers much clarity surrounding the current extensive designation as **“preferred area”** for onshore wind energy across Limerick.

The Mayor is critical of the National Territory Mapping approach which we are fully in agreement of. The national mapping should serve as a comprehensive national baseline for future renewable deployment, rather than as an overlay of historically mapped zones, which in the case of Limerick has been stagnant since 2005 and is critically out of date.

The letter explains how the LCCC have essentially been prevented from amending their Wind Energy Guidelines and designations for appropriate areas for siting of onshore wind energy. The Mayor states

“this guidance remains the Department's official position. Consequently, Planning Authorities have been unable to update their Development Plans in this regard and are awaiting the publication of revised Wind Energy Guidelines for incorporation.... authorities were instructed to continue operating under their current policies until *a focused review of the Wind Energy Development Guidelines 2006 is completed”*

To summarise, Map 9.1 Wind Energy Locations: Preferred Areas was:

- Created in 2005, based entirely on Landscape Character Assessment.
- Designated the entire Agricultural Lowlands as “preferred” areas for wind energy development;
- Based on turbine models that were, at the time, one-third the height of modern turbines (approximately 50 m high);
- Drafted before any significant understanding existed of the health impacts of turbine noise, including amplitude modulation, low-frequency noise, infrasound, and shadow flicker.

The Council has been blocked from amending these outdated designations since 2013, leaving communities unprotected from inappropriate development.

The EIAR states that the project falls in an area classed as ‘Preferred Area’ for wind farm development in the Renewable Energy Strategy for Co. Limerick. The applicant seems to place its entire reasoning and site selection on this designation

The applicant, Greensource, is now exploiting these regulatory constraints, relying on outdated designations to justify a proposal that would never be acceptable under modern planning or environmental standards.

Insufficient Evidence That This is a Preferred Site

The EIAR states that the project falls in an area classed as 'Preferred Area' for wind farm development in the Renewable Energy Strategy for Co. Limerick. The applicant seems to place its entire reasoning and site selection on this designation.

As outlined above, Map 9.1 of the *Limerick Development Plan 2022–2028* — the map underpinning this classification — is significantly outdated and not informed by current guidelines or scientific evidence. It was derived from legacy assessments dating back to 2005, when turbine technology, scale, and understanding of environmental and health impacts were entirely different.

The applicant justifies the site selection solely because it lies within a "Preferred Area" under the *Limerick Development Plan 2022-2028*. This indicates *planning policy compliance* substituted for genuine environmental comparison, contrary to the spirit of Article 5(1)(d) of the EIA Directive, which requires environmental, not policy, justification for site choice.

SEAI Wind Atlas

AS per the SEAI Wind Atlas website:

> *"The goal is to aid policy makers, local governments and community groups in the initial planning stages, we want to educate developers and the general public on Ireland's current wind resource environment"*.

In the case of Limerick 2022-2028 Development Plan, WEI instructed the Limerick Executive not to use this map when reviewing the Draft plan for 2022-2028 regarding zoning map for locations for wind energy. When you refer to the map itself it shows Bruree, Effin and Charleville to be of very poor wind capability and using the SEAI Atlas for its intended use deems the area unsuitable for wind farm development (average wind speed 7.0-7.1 m/s).

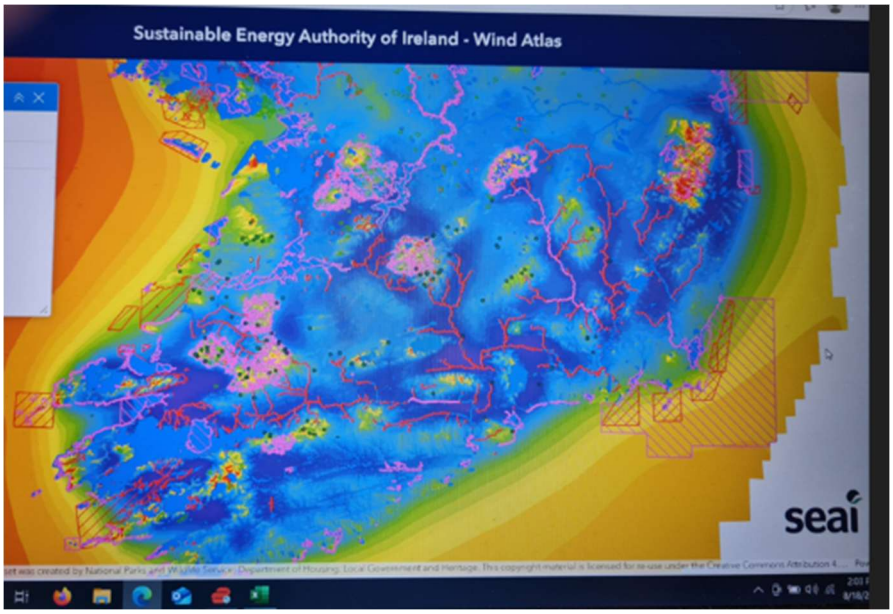


Figure 7:Figure 1: Southern Region of Ireland Wind Resource

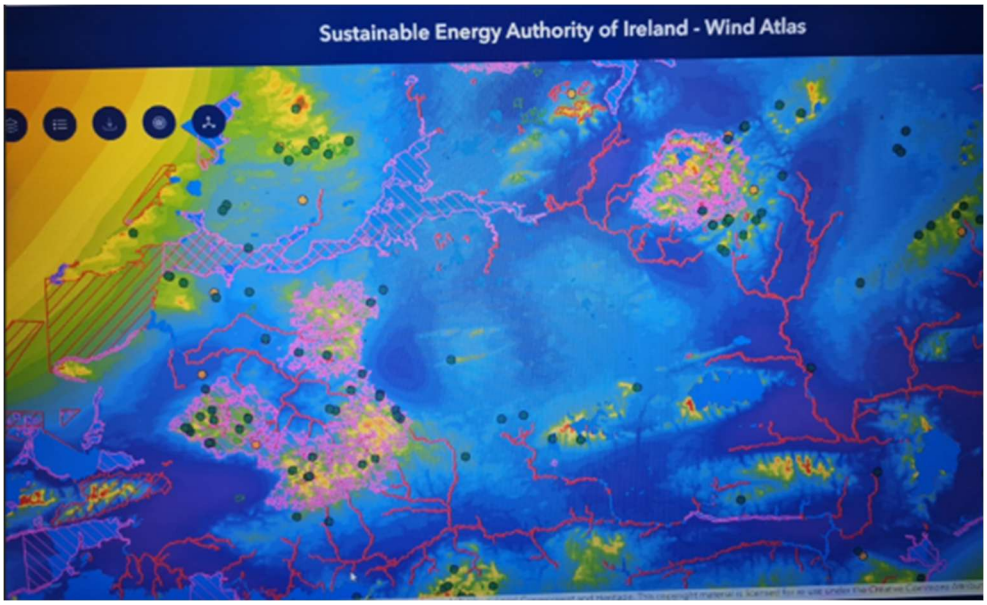


Figure 2: Limerick Region of Ireland Wind Resource

The lack of suitability this site presents for Garrane Wind Farm and its context in the landscape. The current zoning although designated as "preferred" for onshore wind, was heavily influenced by representatives of the Wind Industry as we will discuss further in this submission. It is critical the board are aware of the density of planned wind turbines within proximity of each other, a practice known as "project splitting".

2.4 WIND RESOURCE

Due to its location in the southwest of Ireland, and elevation, the Site experiences high average annual wind speeds. The Irish Wind Atlas produced by Sustainable Energy Ireland shows average wind speeds for the country and it shows that wind speeds on the Site are consistent with windfarm development (5.4m/sec at 30m, 6.8m/sec at 75m, 7.2m/sec at 100m and 8m/sec at 150m) of the nature of the Project being viable at this location.

Figure 8: Extract from Chapter 2 Project Description

This is factually incorrect. The SEAI Wind Atlas clearly demonstrates that the area for these 9 turbines is less than favourable. We challenge this assertion made by the developer. If wind speeds are "consistent" with windfarm development, we would ask the Board to seek Further Information and evidence that this is a "viable" development.

From viewing the Wind Atlas, currently there are no Wind Farms sighted in these "blue areas". Wind farms in Co.Limerick to date are in high elevation areas.

For reference bright colours indicate higher wind speeds and the darker colours (blue) indicate lower wind speeds.

The SEAI Wind Atlas Maps (attached) reflect Limerick areas including Bruree/ Effin/ Charleville which are low-lying, to have a poor wind resource and therefore modern-day turbines would produce low energy yield within a wind farm if one were sited here

> *"The Submission by the Irish Wind energy Association recommend that the SEAI wind atlas or any similar general wind resource data not be used as a constraint when developing and zoning*

The IWEA (now known as WEI) is a lobby group for the wind industry and their recommendation not to use the wind atlas is a self-serving science agnostic attempt to open more land for wind development. The enclosed National Territory Mapping demonstrates that the counties of Limerick and Waterford contain the overwhelming majority of land that would be available to wind development. This is notwithstanding the poor wind resource over most of these designated area as demonstrated in the enclosed extract from the wind atlas.

We ask the Board to justify siting a wind-farm in an area of such low wind regime, at the expense of the visual impact as discussed. We ask the Board to do its Due-Diligence and analyse the economic viability of such a project against the gain factoring in mitigation and constraint payments to the developer.

cumulative effect increasing the visual impacts of placing Industrial Wind Turbines in low-lying plains across multiple areas in such an irregular spacing lacking design and consideration.

Summary

In summary, the irregular turbine sizes and inconsistent spacing between the Garrane and Ballinlee wind farms result in a clustered and visually intrusive development pattern. This cumulative visual impact causes significant and unacceptable harm to the historic and scenic character of the Golden Vale landscape, an area long recognised for its cultural, agricultural, and visual importance. The absence of a proper cumulative impact assessment shows that the developer has not met basic EIA requirements.

There are multiple breaches and deficiencies within this application. The Environmental Impact Assessment Report (EIAR) relies on outdated and non-compliant guidance,and fails to adequately address international and EU environmental obligations, including those relating to landscape protection, cumulative environmental effects and likely significant effects **on Annex** I species and their habitats.

Accordingly, the proposal cannot be considered lawful or consistent with the principles of proper planning and sustainable development.

We therefore respectfully request that An Bord Pleanála reject this application in its entirety.

The committee of Bruff Dromin Athlacca – Ballinlee Community Action Group

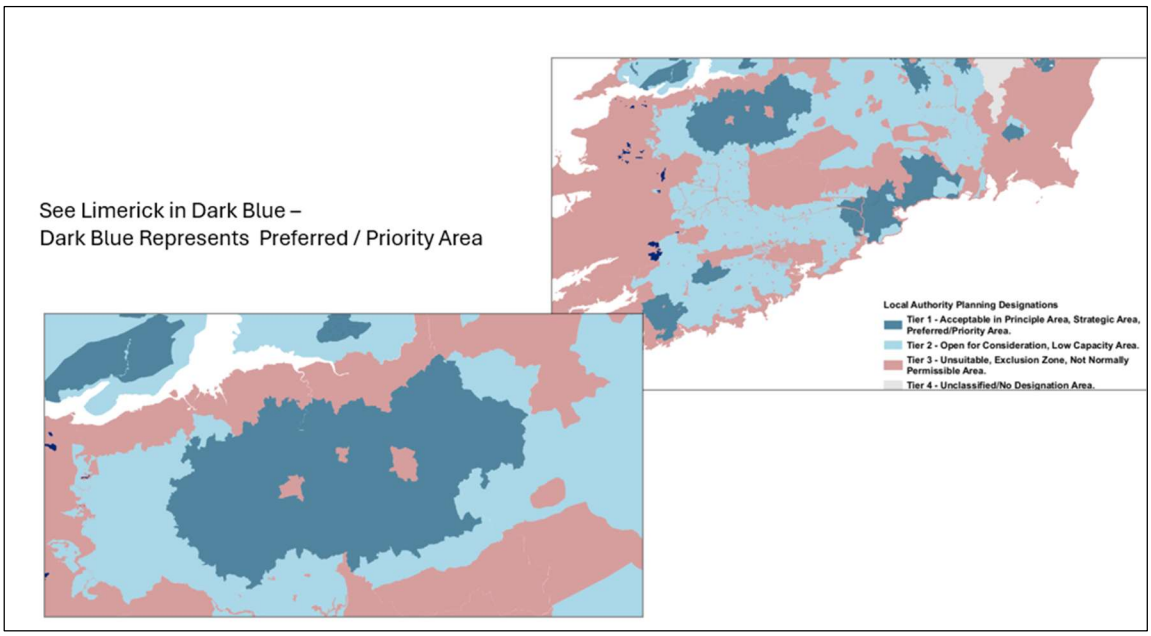
Michael Heelan - Chairperson
Marie-Clare Power – Vice Chair
Angela Tobin – Treasurer
Roisin Keating – Secretary
Niall Brosnan -Committee Member
Anne-Marie O' Regan – Committee Member
Michael Cronin – Committee Member
Marion Mulqueen- Committee Member
Brian Finn – Committee Member
Jack O'Shea- Committee Member
Karol O'Regan – Committee Member
Noreen O'Shea- Committee Member
John Richmond - Committee Member
Brigid Hayes - Committee Member
Noelle Heffernan – Committee Member

Appendix

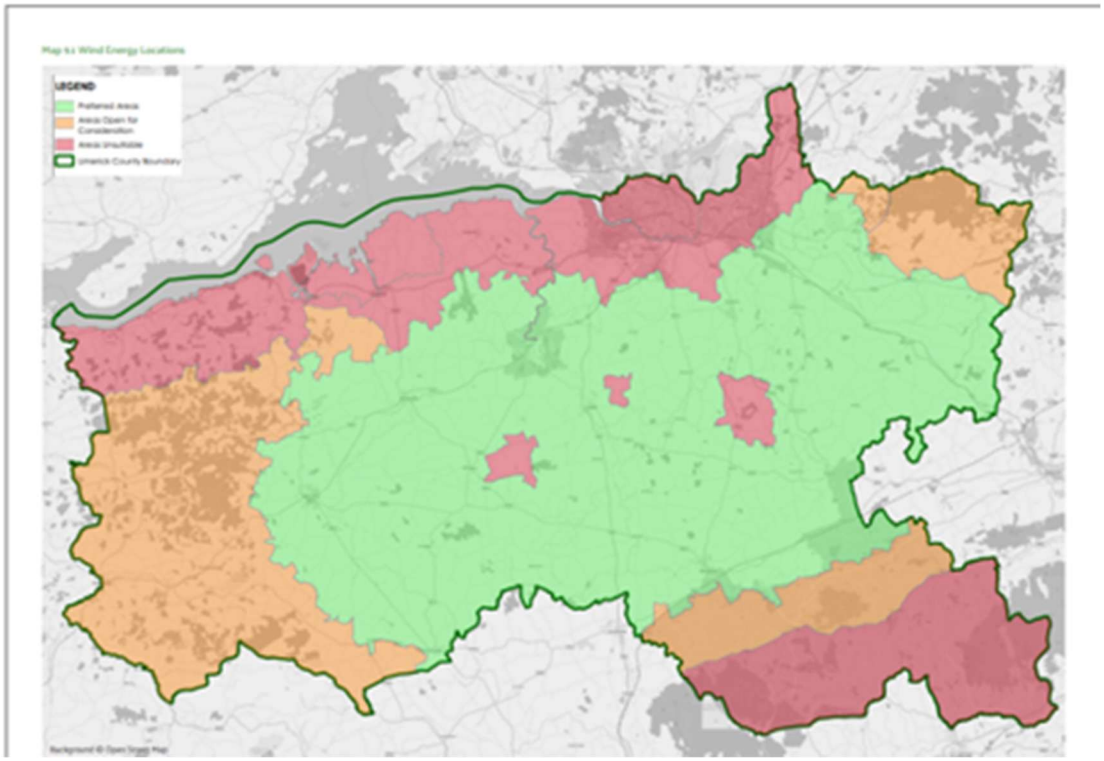
Appendix 1: Extract from National Territory Mapping for On-Shore Wind Energy under Directive (EU) 2023/2413 (RED III)

https://assets.gov.ie/static/documents/Map_1_-_National_Territory_Mapping_for_Grid-Scale_Onshore_Wind.pdf

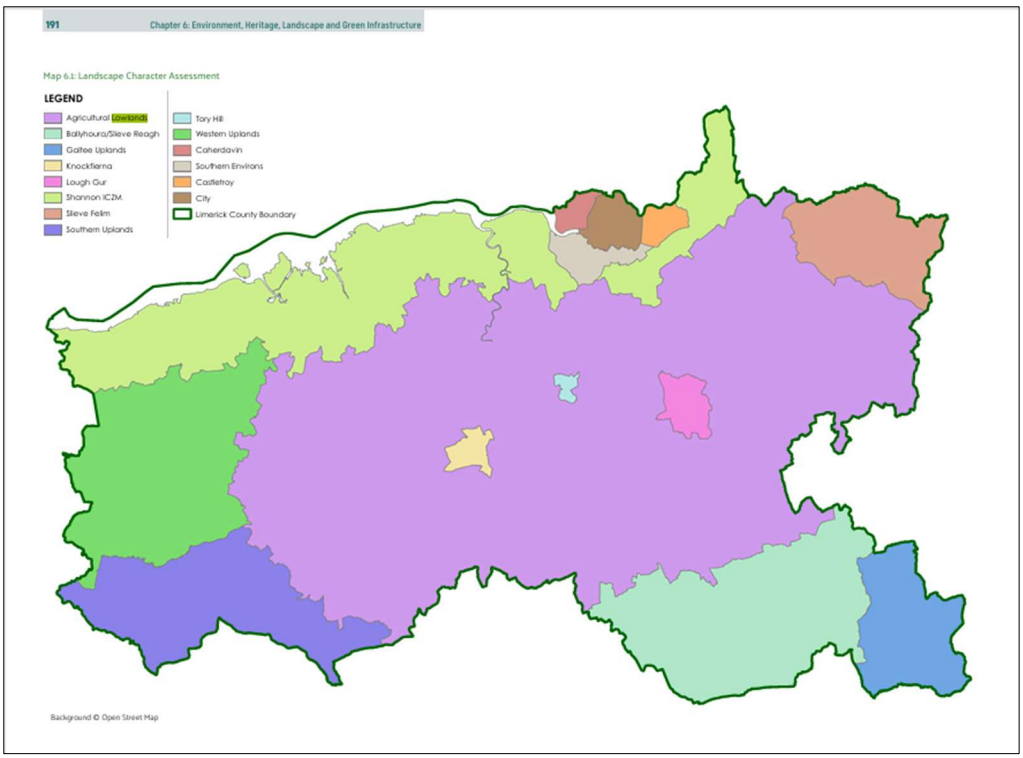
Limerick is disproportionate to the rest of the Country, along with Waterford.



Appendix 2: Map 9.1: Wind Energy Locations - Limerick Development Plan – Area in Green "Preferred" for Wind Energy



Appendix 3: Map 6.1: Landscape Character Assessment - LDP – Area in Green "Preferred" for Wind Energy



Appendix 4: Limerick City and County Councils Submission to the National Territory Mapping for Renewable Energy dated 10th October

Comhairle Cathrach & Contae Luimnigh
Limerick City & County Council

Pleanáil, agus Cruthú Áite
Ceanncheathrú Chorparáideach
Comhairle Cathrach agus Contae Luimnigh
Cé na gCeannaithe, Luimneach
V94 EH90

Planning and Place-Making
Corporate Headquarters
Limerick City and County Council
Merchant's Quay, Limerick
V94 EH90

Renewable Electricity Section
Department of Climate, Energy and the Environment
Tom Johnson House
Haddington Road
Dublin
D04 K7X4

10TH October 2025

A Chara,

Limerick City and County Council welcomes the opportunity to provide feedback on this public consultation on National Territory Mapping for Renewable Electricity.

National Territory Mapping

Article 15b of the relevant EU directive obliges Member States to undertake a "coordinated mapping" of their national territories. This exercise is intended to identify domestic potential and available land, sub-surface, sea, and inland water areas suitable for the installation of renewable energy infrastructure, in order to meet 2030 targets.
The National Territory Mapping is based on areas already designated for renewable energy generation in existing statutory Local Authority Development Plans. This approach is not considered appropriate as Circular PL 20-13 of 2013 advised local authorities to refrain from amending existing Development Plan policies related to wind and renewable energy during the standard six-year review cycle or through plan variations. Instead, authorities were instructed to continue operating under their current policies until a focused review of the Wind Energy Development Guidelines 2006 is completed. This guidance remains the Department's official position. Consequently, Planning Authorities have been unable to update their Development Plans in this regard and are awaiting the publication of revised Wind Energy Guidelines for incorporation.

The wind energy map included in the Limerick Development Plan 2022–2028 is based on Landscape Character Assessments, as required under the Planning and Development Act 2000 (as amended). This approach was first adopted in the 2005 Limerick County Development Plan and carried forward into the 2010 Plan, which considered the 2006 Wind Energy Guidelines. These provisions remained in effect until the adoption of the first joint City and County Development Plan in June 2022. This approach to identifying areas for wind energy development was different in each local authority and therefore should not form the basis for a national territory map to identify potential renewable energy capacity for the country.

The National Planning Framework provides enhanced policy support for renewable energy development. Notably, it introduces regional renewable electricity capacity allocations (NPO74) for wind and solar energy to help achieve the targets set out in the Climate Action Plan 2024. These allocations will be incorporated into upcoming Regional Spatial and Economic Strategies (RSES), which will guide city and county development plans.

Additionally, Section 29(m) of the new Planning and Development Act 2024 requires Regional Assemblies to prepare a landscape strategy that harmonizes the categorization of landscapes across regions. This strategy will assess the capacity of different landscapes to accommodate specific types of development, ensuring a consistent approach to landscape protection. In line with the hierarchical structure of national strategies, the next iteration of the Limerick Development Plan will align with this regional approach. This process will help identify areas suitable for large-scale wind energy development, as well as areas deemed unsuitable.

In this respect it is considered that it would be prudent to await the new iteration of Development Plans to provide an updated energy map for the country.

National Territory Mapping for Grid-Scale Onshore Wind in Ireland

The observations outlined in response to Question 1 are directly relevant to this matter and should be considered in full. In addition, the current mapping does not adequately reflect the extent of development already undertaken within Tier 1 and Tier 2 areas. This omission limits the accuracy of the mapping exercise and should be addressed to ensure a more representative depiction of land availability for future renewable energy development.

Having regard to Circular PL 20-13, and the anticipated Regional Spatial and Economic Strategies—which will incorporate regional renewable electricity capacity allocations and coordinated landscape strategies—it is evident that the National Territory Mapping for Grid-Scale Onshore Wind is premature and does not currently reflect an up-to-date position and the true extent of available land. Nor does it appropriately distinguish areas suitable exclusively for repowering existing infrastructure.

Furthermore, consideration should be given to emerging trends in renewable energy development, particularly the integration of battery storage systems. These are increasingly being added to legacy projects or incorporated into new developments. Including battery applications in the mapping framework would capture a critical component of modern renewable energy systems, helping to address intermittency and improve grid stability.

National Territory Mapping for Grid-Scale Solar PV in Ireland

It is acknowledged Limerick and other significant areas of the country do not have solar mapping. This is supported by the large area of the country that is shown as Tier 4 Unclassified /No designation area.

It is suggested that in addition to looking at the wider countryside, consideration needs to be given to the systematic use, where suitable, of buildings, rooftops and other structures in the built environment which could support solar. Further from the point of view of non-compensable reasons for refusal of planning applications (sections 190 to 192 of the Planning Act 2000), phrases such as "available areas with no risk identified" should be avoided in terms of areas suitable for solar or indeed any form of renewable development.

Traditionally County Development Plans focused heavily on wind energy, this emphasis may result in gaps regarding other technologies, such as solar. Therefore, when extrapolating local mapping data to the national level, these gaps must be acknowledged and addressed.

As earlier outlined it is considered that the upcoming RSES will provide required information on renewable energy allocations and landscape characters at a regional level will inform the preparation of a new Development Plan and Solar PV will form part of the review of the Development Plan.

Available Areas of Offshore Renewable Energy in Ireland

The DMAPS process should be used to determine suitable areas.

Renewable Acceleration Area

The Shannon Estuary and its key landbanks at Moneypoint, Ballylongford, Foynes, Askeaton and Limerick are of strategic national importance in terms of delivering on renewable energy targets and are included in various capacities under the national territory mapping. Sites such as Moneypoint are vital as a generation asset with the proposed "repowering" to include for energy storage, development of new generation capacity and the introduction of new thermal technologies which will ensure the site continues to support energy security. It is a strategic node in the transmission network with the site accommodating strategic existing and proposed cables, which will ultimately need to make landfall and connection at Moneypoint if Offshore Renewable Energy is to be delivered in a timely manner and safely uploaded to the grid. Through the installation of a Synchronous Compensator in 2022, this zero-carbon technology helps stabilize the grid as more renewables come online. The Shannon Estuary with its deep-water storage, potential wet storage locations and the presence of Shannon Foynes Port Company (a Tier 1 Port of national significance) should be identified as a Renewable Acceleration Area under Article 15c. Shannon Foynes Port Company is central to Ireland's ambitions in Offshore Renewable Energy (ORE) with the port being developed as a green energy hub, with plans for e-fuels production and support for sustainable logistics.

Through the identification of the Shannon Estuary as a Renewable Acceleration Area under the EU Renewable Energy Directive it will ensure it continues to play its key role as one of the

most important assets for renewable energy development due to its natural geography, strategic location, and existing infrastructure. The Estuary is ideally located to harness Atlantic Offshore Wind especially floating offshore wind and has a capacity to deliver 2GW by 2030 and up to 30GW by 2050 through its strategic location. Ireland's territorial waters in this region could generate 10 times the country's energy needs, making it a potential net exporter of clean energy and a focal point for the offshore wind industry in Europe.

Through the identification and adoption of the Shannon Estuary as a Renewable Acceleration Area it will work in harmony with the National DMAP for Offshore Renewable Energy which is currently being prepared by the Minister for Climate, Energy and the Environment and will ensure the estuary is ready to accommodate our developing offshore renewable energy sector.

Additional feedback

As a general point for all renewables, any work on mapping should take account of grid and substation capacity, both current and planned, when drafting the maps. It is important to include planned upgrades, as many permissions for renewables are for extended periods of time, such as ten years, so projected grid improvements in that time period could facilitate development within that time frame.

There appears to be a focus on large scale developments at the cost of local community initiatives that can create local decentralised energy communities which can offer not just additional supply to the grid but also demand management which supports the concept of climate resilient communities.

Consideration should also be given to the possible effects of infrastructure and projects on marine and shore-line archaeology.

Limerick City and County Council appreciates the opportunity to contribute to this important process and looks forward to continued collaboration with the Department.

John Moran
Mayor of Limerick