

From: [Shay Kelleher](#)
To: [SIDS](#)
Cc: [Lauren Griffin](#)
Subject: PAX91.323635_Garrane Windfarm
Date: Tuesday 7 October 2025 12:57:05
Attachments: [Outlook-taqwmlz.png](#)
[Outlook-bsza4t1z.png](#)
[Outlook-pyafnhxz.png](#)
[Outlook-piihf2b2.png](#)
[Outlook-Text Desc](#)
[PAX91_323635_Garrane windfarm_limerick_Heritage Council Submission.pdf](#)

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

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 concerns,

Please see attached the Heritage Council's submission on the named application.

A copy has been sent in the post also.

I would welcome confirmation of receipt.

Kind regards

Shay Kelleher

Oifigeach Sinsearach Pleanála | Senior Planning Officer

Tel: | (056) 777 0777 **Web:** heritagecouncil.ie



Charity Reg No: 20036867

This email and any files transmitted with it are confidential and intended only for the use of the individual or entity to which they are addressed. If you have received this email in error, please notify mail@heritagecouncil.ie. The views or opinions presented in this email are solely those of the author and do not necessarily represent those of The Heritage Council. The Heritage Council will not accept any liability in respect of such communication and accepts no liability for the content of this email, or for the consequences of any actions taken on the basis of the information provided, unless that information is subsequently confirmed in writing. We have taken reasonable precautions to ensure no viruses are present.



Planning Ref: PAX91.323635

07 October 2025

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

Dear Sir/Madam

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

Comment

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995. We seek to provide submissions on forward planning, development management and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

Biodiversity

The Heritage Council has reviewed the most pertinent chapters of the Environmental Impact Assessment Report (EIAR), namely chapters 6, 7, and 8. In a general sense, we believe that the main ecological designations (including those identified in the Natura Impact Statement) have been fully considered, and in broad terms we have no objection to the conclusions. Although we would defer to the NPWS on the matter. The mitigation identified in both the biodiversity, and the hydrology chapters need to be secured by condition and should include compliance with Inland Fisheries Ireland guidance¹. This mitigation will also be relevant for potential impacts on otter and other ecological features which are reliant on good water quality.

However, there is also a need to ensure that on site habitats that are of high local value, are protected as far as practicable.

The area to the east of the Charleville Stream and the Mague River that has been characterised as wet/ neutral grassland (GS4/GS1) is of interest. The reporting on biodiversity in the EIAR in

¹ *Planning for Watercourses in the Urban Environment and Guidelines on Protection of Fisheries during Construction Works in and Adjacent to Waters" Inland Fisheries Ireland*

Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson),
John Burgess, Damian Downes, Michael Farrell,
Fionnuala May, Deirdre McDermott, Dr. Patricia O Hare,
John G. Pierce, Sheila Pratschke, Prof. Mark Scott,
Dr. Mary Tubridy

Charity reg. no 20036867

Aras na hOidhreachta, Lana an Teampaill,
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,
Kilkenny, Ireland, R95 X264

T 056 777 0777 | E mail@heritagecouncil.ie

www.heritagecouncil.ie



paragraph 6.3.7.1 has noted that “the very wet grassland areas to the east of the Charleville stream provide habitat for protected species including the common frog and breeding snipe and are therefore rated as “*Local Importance (lower-higher value)*”². This area corresponds, assumedly, to the “very wet areas” where marsh (GM1) habitat is developing in patches, as identified in paragraph 6.3.3.2. This area is likely to correspond to the [Ballynagoul Wetland area](#), particularly given the fluctuation of the water table, as described in the EIAR, which has also identified a relatively high botanical species mix.

It is considered that some sections of the wet grassland (GS4) is of high local value based on suitable habitat for common frog and snipe. Therefore, we do not agree with the statement that because “wet grassland and neutral grassland can vary in ecological interest that in general these habitat types on site are rated as Local Importance (lower value)”. The botanical species mix described on site has a relatively high species mix.

Regardless, the Heritage Council consider the mosaic of wet grassland to be a Key Ecological Receptor (KER) that needs to be considered fully as part of this application. 8.05 hectares³ (Table 8.21) of neutral and wet grassland is noted has being lost resulting in a slight adverse effect. However, the assessment has not clearly illustrated or demonstrated where the most important area of this habitat exists, or how the turbines have been arranged to avoid the most species rich area of habitat, and the area most conducive to common frog/ snipe habitat. It is assumed that turbines 2, 4, 6 and 7, and the substation are the most relevant. It is also necessary to confirm if any of this habitat type corresponds with *Annex 1 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae)*.

Objective EH O12 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*”.

Wet grassland/marsh mosaic has been identified on site, with the value judgement identified in some areas as high local value. These areas are likely to provide the most important habitat for the common frog, and some of the bird species identified in the chapter on ornithology⁴, which has noted that “the site is assessed of being of Local (Higher Value) importance for golden plover (nonbreeding), lapwing (non-breeding) and snipe (all seasons), with the wet grassland specifically important it appears for snipe (red listed bird of conservation concern).

² It is assumed that this is ‘higher value’ as ‘lower-higher value’ is not a value judgement under the used NRA 2009 guidance; and when viewed alongside the fact that the site is assessed as higher value for waders under the ornithological chapter, ‘*locally important higher value*’ is the level of importance that should be assigned to this area of wet grassland/marsh habitat.

³ Please note that different figures are used for the loss of this habitat. 6.04 hectares is noted in the biodiversity chapter.

⁴ Some of the conclusions in this chapter are contradictory. It is stated that the development is on agricultural land with habitats that “are highly modified and are of low ecological value, thus limiting impacts on ornithological features”. The area of wet grassland is not of low ecological value, the most important areas of which are given a Locally Important Higher Value rating in the biodiversity chapter and of high value for some waders.

Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson),
John Burgess, Damian Downes, Michael Farrell,
Fionnuala May, Deirdre McDermott, Dr. Patricia O Hare,
John G. Pierce, Sheila Pratschke, Prof. Mark Scott,
Dr. Mary Tubridy

Aras na hOidhreachta, Lana an Teampaill,
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,
Kilkenny, Ireland, R95 X264

T 056 777 0777 | E mail@heritagecouncil.ie

www.heritagecouncil.ie



Whilst the figures associated with this mapping do identify habitat types GS1 and GS4 in a general sense, there appears to be no identification of the GS4/GM1 patches as discussed. The most important area of this habitat should be mapped and identified, and a demonstration of how this informed the layout and location of specific turbines is needed and should be requested by further information. This area should be then catered for in the Biodiversity Enhancement Plan.

The conclusions on the impacts on wading birds have been considered not significant, as suitable habitat loss for these species will be minimal, and/or small in the case of snipe. More specifically the EIAR noted that limited extents of improved, neutral and wet grassland area habitats will be lost. However, 8.04 hectares of this habitat will be lost (Table 8.21), which is neither small nor limited.

We do note that Chapter 3 (Alternatives) states that ecological assessments were used to inform optimal site selection/layout, however this appears to only note hedgerows and watercourses. While the ornithological chapter specifically states that “ecological information was utilised to avoid impacting potentially important ornithological features where possible” as part of embedded mitigation, while those of greater importance to avian features (e.g., waterbodies, mature trees and hedgerows) will be retained. The wet grassland/ marsh mosaic, which was identified as important for snipe, has not been noted in this context and should be.

Whilst we agree with the EIAR that embedded mitigation should include avoidance of sensitive sites, how this was done in relation to the most important areas of wet grassland/marsh habitat has not been demonstrated fully.

In terms of other habitats, there is a significant loss of hedgerow habitat (the densest network also appears be around wet grassland habitats), although it is acknowledged that a substantial proportion of this is for bat mitigation. The mitigation as proposed should be secured by condition, with strict implementation of the biodiversity enhancement plan being a fundamental pre-requisite. In addition, the curtailment and monitoring regimes regarding bat mitigation should also be secured by condition.

Archaeology.

The Heritage Council believes that there is a distinct possibility for the presence of further sites and features of archaeological interest at a prehistoric and later date. Some of these monuments may be within the construction area of the turbines, and if so, these will undergo irreversible significant damage.

We recommend that a geophysical survey be undertaken on the footprint of the development and the adjacent area which is cross-referenced with LiDAR and other available data sources. From examination of the archaeological record of this area and what has been identified by the EIAR (see Chapter 15, p44, LiDAR sites A-G) there seems to be a complex of prehistoric monuments within the area of this proposed development. There is also a strong likelihood of further unidentified archaeological material. It would therefore be prudent for a planning authority to assess this impact. Accordingly, further assessment of this complex needs to be undertaken.

Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson),
John Burgess, Damian Downes, Michael Farrell,
Fionnuala May, Deirdre McDermott, Dr. Patricia O Hare,
John G. Pierce, Sheila Pratschke, Prof. Mark Scott,
Dr. Mary Tubridy

Charity reg. no 20036867

Aras na hOidhreachta, Lana an Teampaill,
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,
Kilkenny, Ireland, R95 X264

T 056 777 0777 | E mail@heritagecouncil.ie

www.heritagecouncil.ie



Architectural Heritage

Whilst there is a distinct lack of built heritage assets on the site, some of the access routes include features listed on the National Inventory of Architectural Heritage and the Record of Protected Structures. Any impact from construction traffic, accessing the site, on such features should be assessed, which should include the structural integrity of bridges (all arches) to be traversed by heavy loads.

Conclusion

The Heritage Council support renewable energy roll out to meet our climate targets. Climate change is a threat to our natural heritage and therefore proposals for clean sources of energy, such as this, should be supported in a general sense. However, heritage matters should be to the fore, and a clear demonstration of how the most important features, designated or non-designated, have informed site layout is needed.

In this regard we recommend that further information be requested for the following:

- The specific identification of the wetland grassland/marsh habitat which is considered of local importance higher value and how this has informed the arrangement and layout of the turbines.
- A geophysical survey to be undertaken to identify and assess unidentified sites and features of archaeological interest.
- An overview of construction traffic impacts on the structural integrity of features of architectural heritage.

We trust these views will inform An Coimisiún Pleanála's determination of the application.

Yours sincerely

Virginia Teehan

Chief Executive Officer

Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson),
John Burgess, Damian Downes, Michael Farrell,
Fionnuala May, Deirdre McDermott, Dr. Patricia O Hare,
John G. Pierce, Sheila Pratschke, Prof. Mark Scott,
Dr. Mary Tubridy

Charity reg. no 20036867

Aras na hOidhreachta, Lana an Teampaill,
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,
Kilkenny, Ireland, R95 X264

T 056 777 0777 | **E** mail@heritagecouncil.ie

www.heritagecouncil.ie