

Appendix 1B

Stakeholder Consultation and Responses

Ref: AOC/22635

Date 04/09/2024

XXXXXX

XXXXXX

Re: Consultation in relation to a Strategic Infrastructure Development (SID) for a proposed Wind Farm development within the townlands of Ballincurra, Ballinlee South, Ballingayrou, Ballinbea, Knockuregare, Ballinlee North, Carrigeen and Camas South approximately 18km southeast of Limerick City and 4km west of Bruff, Co. Limerick

Dear Sir/Madam,

On behalf of our client and prospective applicant, Ballinlee Green Energy Ltd, Malachy Walsh and Partners (MWP) would like to make An Taisce aware that we have opened a Strategic Infrastructure Development (SID) pre-application consultation with An Bord Pleanála under Section 37B of the Planning and Development Act 2000, as amended, for the proposed development of a Wind Farm Development in the townlands of Ballincurra, Ballinlee South, Ballingayrou, Ballinbea, Knockuregare, Ballinlee North, Carrigeen and Camas South approximately 18km southeast of Limerick City and 4km west of Bruff within the administrative boundary of County Limerick.

The proposed development will comprise up to 17 No. wind turbines, associated infrastructure and a grid connection with a potential output of 75 to 90MW of electricity. The Applicant is seeking a 10-year permission to construct the development, which, when commissioned, would have an operational life of 30-35 years. MWP have been commissioned to prepare an Environmental Impact Assessment Report (EIAR) and Planning Application for this proposed Wind Farm development.

Details of the proposed project are provided in the attached project description document. We consider this project to be Strategic Infrastructure Development under the Seventh Schedule to the Strategic Infrastructure Act, 2006, as amended, Class 1 which states that the following shall be strategic infrastructure development:

"An installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines or having a total output greater than 50 megawatts."

Having regard to the nature and scale of the proposed development comprising of up to 17 No. turbines, the proposed development has the potential to produce between 75 to 90 MW, therefore falling within the above scope.

MWP are consulting with you on this proposal as it may be of interest or concern to you (or your organisation). While there will be the opportunity to make a submission on the proposed development as part of the planning process, if there is any key issue which you consider should be addressed in the EIA/EIAR we would welcome your input at this early stage.

Should you require any further information please contact the undersigned.

Yours sincerely,

A handwritten signature in black ink, reading "Aileen O'Connor", is displayed on a light blue rectangular background.

Aileen O'Connor

Senior Environmental Consultant

And Project Manager

for MWP

MWP

Preliminary Project Details
Proposed Ballinlee Green Energy Project

Ballinlee Green Energy Ltd.

August 2024

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Project No.	Doc. No.	Rev.	Date	Prepared By	Checked By	Approved By	Status
22635	6002	A	22/08/2024	VH	AOC	KF	FINAL

MWP Engineering and Environmental Consultants
Address: Reen Point, Blennerville, Tralee, Co. Kerry, V92 X2TK, Ireland
www.mwp.ie



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1. Introduction

Ballinlee Green Energy Ltd. (“the Applicant”) are entering into a pre-planning consultation with An Bord Pleanála for the development and operation of a commercially viable wind farm project in, Co. Limerick. It is envisaged that the development will consist up to seventeen (17) wind turbines with a maximum tip height of 160 metres, an on-site electrical substation, a grid connection route and other ancillary infrastructure.

MWP (Malachy Walsh and Partners Engineering and Environmental Consultants) have been commissioned by Ballinlee Green Energy Ltd. to undertake the design, planning application and Environmental Impact Assessment Report (EIAR) for the proposed development.

Baseline assessments and constraints studies commenced at the site in 2020 and are ongoing. These will provide the necessary information on the receiving environment at, and in the vicinity of, the site and will enable MWP to identify and evaluate environmental constraints and potential sensitivities to ensure the design of a development with the least environmental impact.

This document provides preliminary details on the proposed project and has been prepared for the pre-planning consultation phase of the project.

2. Project Overview

2.1 Developer/Applicant Details

Ballinlee Green Energy Ltd. is an innovative Irish renewable energy company based in Adare, Co. Limerick that specialises in the development of renewable energy projects, working with communities from pre-planning to operation, and creating long-lasting local partnerships. The project team has over ten years development and operational experience. The company has a highly skilled and experienced team who are committed to developing projects with successful outcomes for all stakeholders. Working with integrity and care for the local environment, the team has a strong track record, having successfully completed wind energy and other renewable projects in the West of Ireland.

2.2 Site Location

The site under consideration is located on privately-owned predominantly agricultural lands within the townlands of Ballincurra, Ballinlee South, Ballingayrou, Ballinbea, Knockuregare, Ballinlee North, Carrigeen and Camas South approximately 18km southeast of Limerick City and 4km southwest of Bruff, Co. Limerick. The site is situated in a rural area characterised by agricultural holdings and one-off residential dwellings.

The site is also located within a ‘Preferred Area’ for wind energy development as defined in the current Limerick County Development Plan 2022-2028.

A site location map is provided in **Appendix 1**.

2.3 Roads Infrastructure/Access

The site is located in mainly agricultural flatlands due southwest of the town of Bruff. Access to the site will be via the Local Road network. The R512 is located to the east of the site running from Bruff to Kilmallock. The closest National primary road is the N20 located to the west of the proposed site. Access to the site will be via the R516 Regional Road between Croom and Bruff on the north side of the site.

2.4 Details of Proposed Development

The proposed development will involve the construction and operation of a wind farm and all associated infrastructure with an export capacity of approximately 75-90MW. The preliminary consultation study area is shown in **Appendix 2**.

It is envisaged the development will comprise the following components:

Key Components:

- Wind turbines with ground level foundations and crane hardstand areas;
- On-site access tracks;
- On-site interconnecting electrical cabling;
- On-site electrical substation;
- Temporary construction compound;
- Meteorological mast;
- Borrow pits and spoil management areas;
- Grid connection comprising underground cabling to Killonan substation.

Off-site components:

- Turbine delivery route

A preliminary consultation layout area is provided in **Appendix 2**. The rationale behind the current turbine locations is as a result of comprehensive environmental constraints and baseline studies that have been completed at the site to date. This layout is a first iteration albeit after considerable refining having considered survey information obtained during the development process. Further layout iterations may emerge as the studies and the Environmental Impact Assessment progress with the possibility that the final positions of the wind turbines and other infrastructure will be refined in order to avoid or reduce effects. Adjustments may occur due to social and engineering issues/constraints.

2.5 Consultation

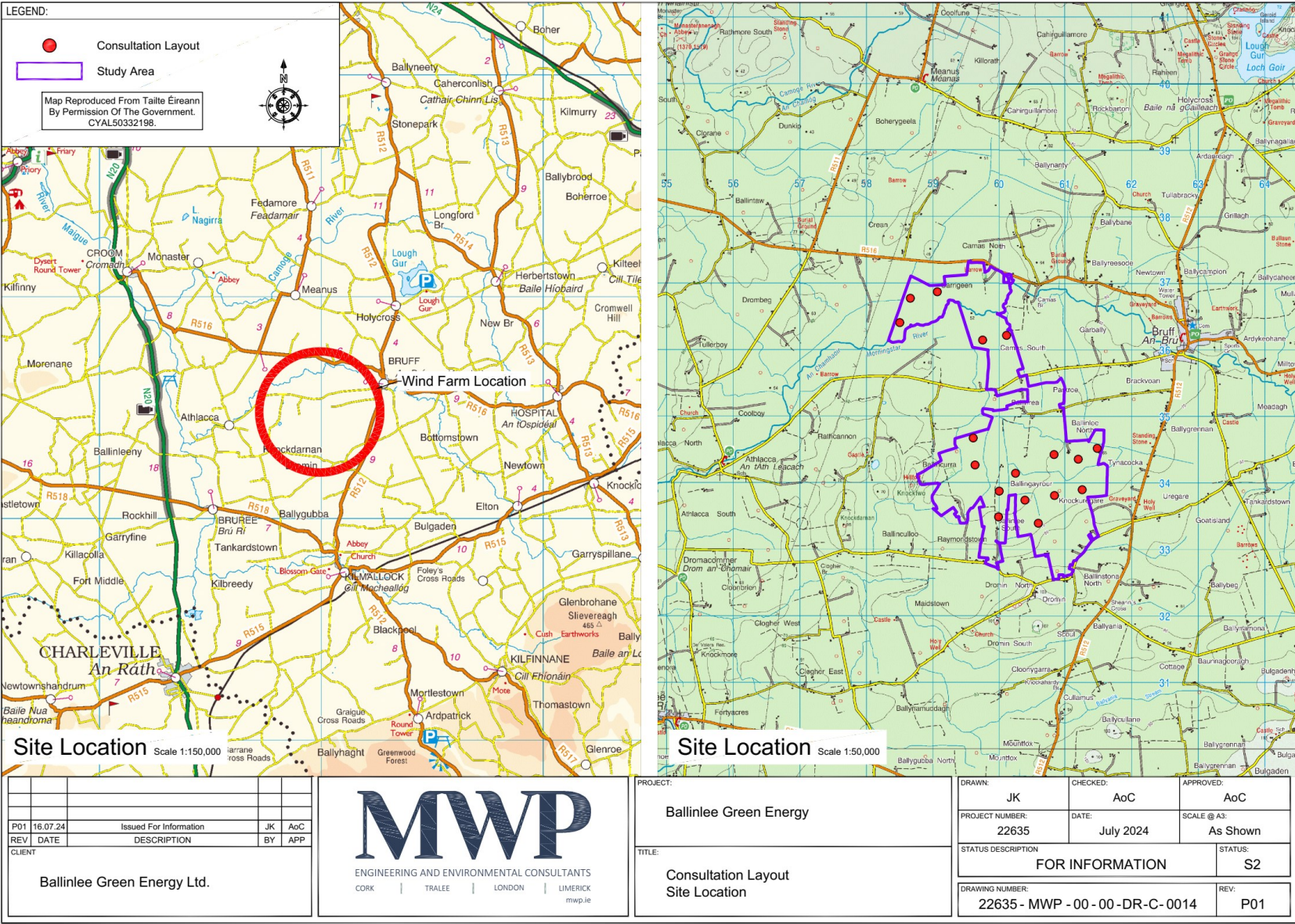
Consultation with Limerick City and County Council and other interested organisations is now commencing.

3. Views/Comments/Feedback

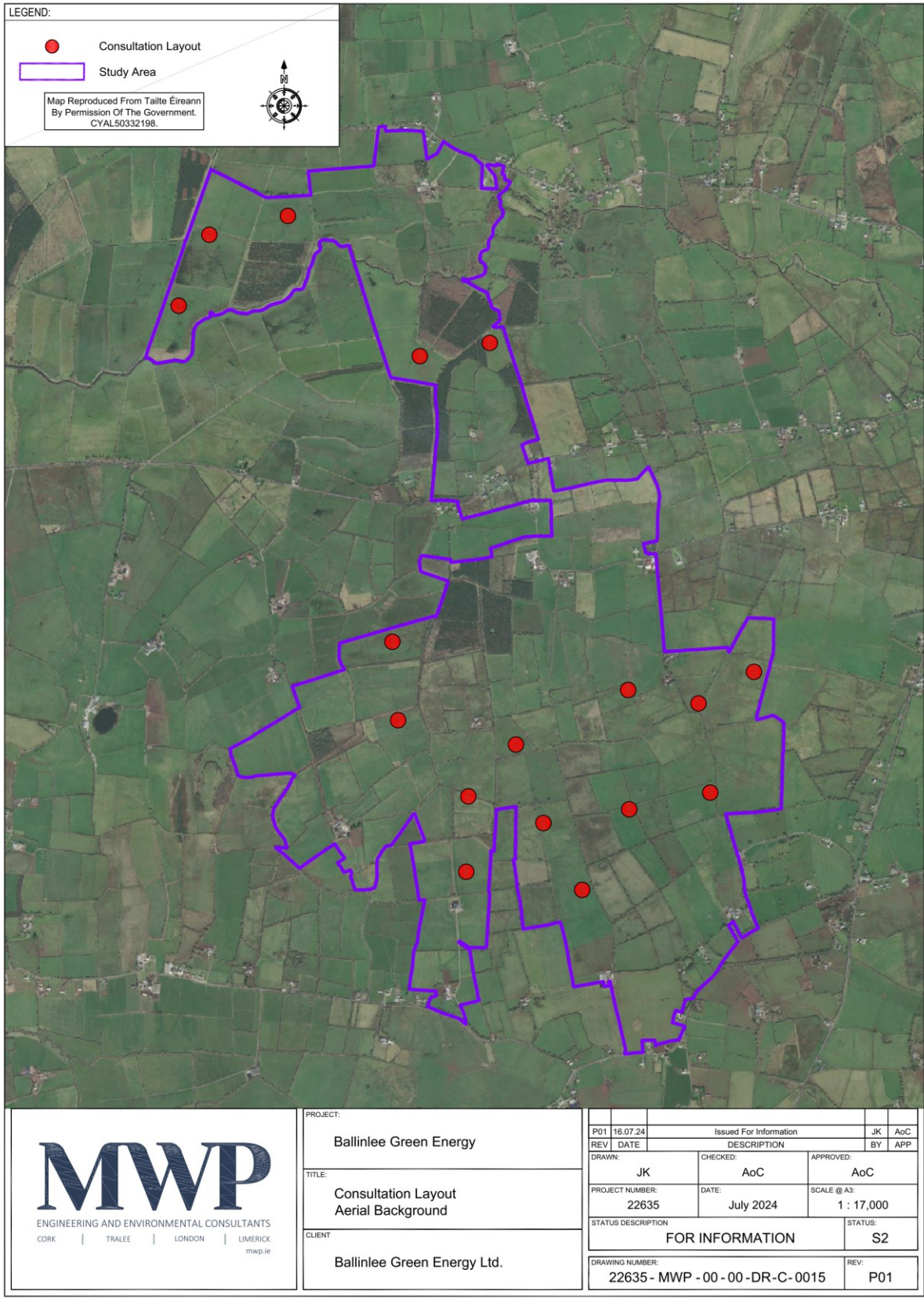
It is recognised that consultation early and often is a critical component of the EIA process and we therefore value your input at this early stage, with regard to any issues that you may have in relation to wind energy development in this area. Comments regarding the proposed development are invited from all interested parties and can be forwarded to:

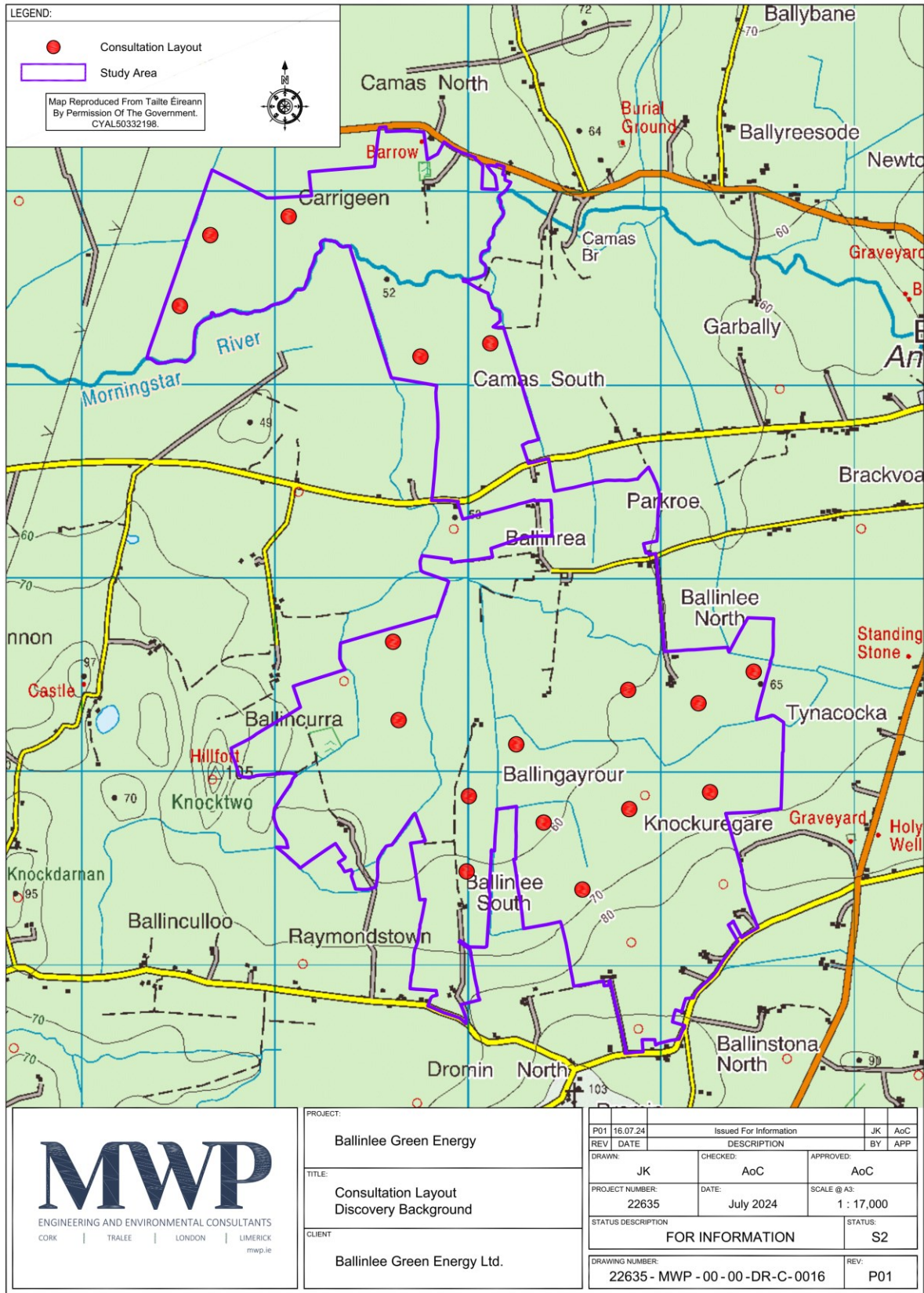
Aileen O'Connor,
Senior Environmental Consultant and Project Manager
MWP,
Reen Point, Blennerville,
Tralee, Co. Kerry,
V92 X2TK, Ireland
Email: aileen.oconnor@mwp.ie

Appendix 1



Appendix 2





Organisation	Response/Feedback Received
An Taisce	No
Arts Council (Comhairle Ealaíon)	No
Commission for Communications Regulation	No
Commission for Regulation of Utilities, Water & Energy (CRU)	No
Department of Agriculture, Food and the Marine	Yes
Department of Environment, Climate and Communications	Yes
Department of Housing, Local Government and Heritage	Yes
Department of Rural and Community Development	No
Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media	No
Faite Ireland	No
Gas Networks Ireland	No
Health & Safety Authority	No
Health Service Executive (HSE) – Local Health Office	No
Heritage Council	No
Inland Fisheries Ireland (IFI) (Limerick)	Yes
Irish Aviation Authority (IAA)(HQ)	No
Irish Aviation Authority (IAA) (Shannon Centre)	No
Limerick City and County Council – Environment, Recreation and Climate Change Department	Yes
Limerick City & County Council – Planning Department	No
Limerick City & County Council – Roads & Traffic Department	No
NPWS – Development Applications Unit	Yes
Office of Public Works (OPW)	Yes
Shannon Airport Authority	No
Southern Regional Assembly	No
Transport Infrastructure Ireland (TII)	Yes
Uisce Éireann	Yes
Gas Network Ireland (GNI)	No

Our Ref: PN24000010770

For the attention of Aileen Ryan

MWP
Reen Point,
Blennerville,
Tralee, Co. Kerry.
V92 X2TK

8th October, 2024

Uisce Éireann
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Éire

Uisce Éireann
PO Box 6000
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Ireland

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www.water.ie

By Email: aileen.oconnor@mwp.ie

Re: EIA Scoping Request – Proposed Wind Farm development, within the townlands of Ballincurra, Ballinlee South, Ballingayrou, Ballinbea, Knockuregare, Ballinlee North, Carrigeen and Camas South Co. Limerick

Dear Aileen Ryan,

Uisce Éireann has received notification of your Environmental Impact Assessment (EIA) scoping request relating to the proposed Wind Farm located within the townlands of Ballincurra, Ballinlee South, Ballingayrou, Ballinbea, Knockuregare, Ballinlee North, Carrigeen and Camas South Co. Limerick

Please be advised that there are water mains located within the local roads just south of Camas South and in the local road in Ballinrea. If cabling is proposed as part of the development, there may be a possibility of interactions with Uisce Éireann's infrastructure within the public roads. If so, prior to any planning application submission, the applicant is required to submit a diversion enquiry to Uisce Éireann and receive a Confirmation of Feasibility (COF) letter from Diversions Dept, that will form part of the formal planning application lodgment documentation.

Details of the water mains in question can be obtained by emailing an Ordnance Survey map identifying the proposed location of the applicant's intended development to datarequests@water.ie

If the applicant then requires a diversion, they will need to contact our Diversions teams as you are proposing to build near / on existing Uisce Éireann infrastructure. The applicant can engage with our Uisce Éireann Diversions Team (Diversions@water.ie)

You can find the more information on <https://www.water.ie/connections/developer-services/diversion-and-build-over/> . Once Uisce Éireann completes the review and it is deemed to be acceptable the applicant is issued with a COF letter. Any proposal diversion/replacement/build over works needs to be in compliance with UÉ Standards and Code of Practices. This can be found on <https://www.water.ie/connections/developer-services/standard-details-codes/>

Please see attached, Uisce Éireann's scoping opinion in relation to Water Services. On receipt of the planning referral, Uisce Éireann will review the finalised Environmental Impact Assessment Report (EIAR) as part of the planning process.

Queries relating to the terms and observations above should be directed to planning@water.ie

Yours sincerely,

PP Ali Robinson

Signed on behalf of Dermot Phelan
Connections and Developer Services

Uisce Éireann's Response to EIA Scoping Requests

At present, Uisce Éireann does not have the capacity to advise on the scoping of individual projects. However, in general the following aspects of Water Services should be considered in the scope of an EIA where relevant;

- a) Proximity to Abstraction Points. All potential impacts arising from the development proposal on Uisce Éireann's abstraction points must be identified and addressed in the EIAR. This includes any other surface water or groundwater abstraction points where a potential hydrological and hydrogeological pathway exists. The EIAR must include and consider all direct, indirect and cumulative effects on the abstraction points. The potential impacts on Uisce Éireann's public water supply abstraction source located in Athlacca South in particular, needs to be considered in the EIAR assessment as well as any other UÉ drinking water supply locations in the area.
- b) Where the development proposal has the potential to impact an Uisce Éireann Drinking Water Source(s), the applicant shall provide details of measures to be taken to ensure that there will be no negative impact to Uisce Éireann's Drinking Water Source(s) during the construction and operational phases of the development. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified as part of the report.
- c) Where the development proposes the backfilling of materials, the applicant is required to include a waste sampling strategy to ensure the material is inert.
- d) Mitigations should be proposed for any potential negative impacts on any water source(s) which may be in proximity and included in the environmental management plan and incident response.
- e) Any and all potential impacts on the nearby reservoir as public water supply water source(s) are assessed, including any impact on hydrogeology and any groundwater/ surface water interactions.
- f) Impacts of the development on the capacity of water services (*i.e. do existing water services have the capacity to cater for the new development*). This is confirmed by Uisce Éireann in the form of a Confirmation of Feasibility (COF). If a development requires a connection to either a public water supply or sewage collection system, the developer is advised to submit a Pre-Connection Enquiry (PCE) enquiry to Uisce Éireann to determine the feasibility of connection to the Irish Water network. All pre-connection enquiry forms are available from <https://www.water.ie/connections/connection-steps/>.
- g) The applicant shall identify any upgrading of water services infrastructure that would be required to accommodate the proposed development.
- h) In relation to a development that would discharge trade effluent – any upstream treatment or attenuation of discharges required prior to discharging to an Uisce Éireann collection network.
- i) In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks and potential measures to minimise and or / stop surface waters from combined sewers.

- j) Any physical impact on Uisce Éireann assets – reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets.
- k) When considering a development proposal, the applicant is advised to determine the location of public water services assets, possible connection points from the applicant's site / lands to the public network and any drinking water abstraction catchments to ensure these are included and fully assessed in any pre-planning proposals. Details, where known, can be obtained by emailing an Ordnance Survey map identifying the proposed location of the applicant's intended development to datarequests@water.ie
- l) Other indicators or methodologies for identifying infrastructure located within the applicant's lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site.
- m) Any potential impacts on the assimilative capacity of receiving waters in relation to Uisce Éireann discharge outfalls including changes in dispersion / circulation characterises. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified within the report.
- n) Any potential impact on the contributing catchment of water sources either in terms of water abstraction for the development (*and resultant potential impact on the capacity of the source*) or the potential of the development to influence / present a risk to the quality of the water abstracted by Uisce Éireann for public supply should be identified within the report.
- o) Where a development proposes to connect to an Uisce Éireann network and that network either abstracts water from or discharges wastewater to a "protected"/ sensitive area, consideration as to whether the integrity of the site / conservation objectives of the site would be compromised should be identified within the report.
- p) Mitigation measures in relation to any of the above ensuring a zero risk to any Irish Water drinking water sources (Surface and Ground water).
- q) Stormwater Run Off and Hydrocarbons. The potential impacts arising from run off and hydrocarbon during construction, operational and decommissioning phases should be addressed to include mitigations against contaminants entering groundwater and surface waters via hydrological and hydrogeological pathways.

This is not an exhaustive list.

Please note;

- Where connection(s) to the public network is required as part of the development proposal, applicants are advised to complete the Pre-Connection Enquiry process and have received a Confirmation of Feasibility letter from Uisce Éireann ahead of any planning application.
- Uisce Éireann will not accept new surface water discharges to combined sewer networks.



Aileen O'Connor
MWP
Reen Point
Blennerville
Tralee
Co. Kerry, V92 X2TK

07 October 2024

Re: Proposed Ballinlee Wind Farm
Your Ref: AOC/22635
Our Ref: 24/327

Dear Aileen,
Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and interpretation and gather various data for that purpose. Please see our [website](https://www.gsi.ie) for data availability.

With reference to your email received on the 10 September 2024, concerning the proposed Ballinlee Wind Farm, we recommend using our various data sets when conducting the EIAR, SEA, planning and scoping processes for developments, plans and policies. For more detailed information on how to access this data please access 'Data and Maps' [Data & Maps \(gsi.ie\)](https://www.gsi.ie) on our 'Geoscience for planning' webpage. Use of our data or maps should be attributed correctly (please refer to each individual dataset's metadata for correct attribution).

For specific data available for Environmental Assessment and Planning topics please follow this link [[Data by Environmental Assessment and Planning Topic \(gsi.ie\)](https://www.gsi.ie)], where you will find our data arranged by environmental assessment topic as illustrated below:

Land and soils <i>Soil</i> - Subsoils (Quaternary Geology) - Tellus Geochemistry - Geotechnical <i>Geology</i> - Bedrock - Geophysics - Bedrock & Quaternary 3D	Water <i>Groundwater</i> - Aquifers GW vulnerability, GWPSs (GWPPs) <i>Surface water</i> - Tellus Geochemistry <i>Estuarine & marine waters</i> - Marine and coastal <i>Flooding</i> - GWClimate - Karst	Climate Change <i>Carbon accounting / Carbon balance</i> - Geothermal - Carbon capture and storage <i>Climate change trends</i> - National coastal change assessment
Cultural Heritage <i>Archaeology</i> - Cherish <i>Underwater Archaeology</i> - Shipwrecks	Material Assets <i>Built Services</i> - Natural resources (Minerals & Aggregates) - Active quarries	The Landscape <i>Landscape Appearance & Character</i> - Physiographic units <i>Historical landscapes</i> - Historic mines
Other Relevant Data		
<i>Natural (Geo) hazards</i> - Landslide Susceptibility Mapping - Groundwater flooding - Coastal vulnerability - Subsidence - Radon	<i>Natural heritage</i> - Geoheritage (County Geological Sites) - Dimension Stone/Stone Built Ireland	



Other Comments

Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. The data would be redacted for confidentiality and added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to the Geological Mapping Unit, at <mailto:GeologicalMappingInfo@gsi.ie>.

If we can be of any further help, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at GSIPlanning@gsi.ie.

Yours sincerely,

Dr. Clare Glanville
Senior Geologist
Geoheritage and Planning Programme
Geological Survey Ireland

Trish Smullen
Geologist
Geoheritage and Planning Programme
Geological Survey Ireland

The publicly available data referenced/presented here, should in no way be construed as Geological Survey Ireland support for or objection to the proposed development or plan. The data are made freely available to all and can be used as independent scientific data in assessments, plans or policies. It should be noted that in many cases these data are a baseline or starting point for further site specific assessments.

**OPW**

Oifig na
nOibreacha Poiblí
Office of Public Works

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Ref 379 -2024

Your ref: Project No. AOC/22635

**Ms. Aileen O Connor,
MWP,
Reen Point,
Blennerville,
Tralee,
County Kerry.**

aileen.o'connor@mwp.ie

**Re: The Proposed Windfarm within the townlands of Ballincurra, Ballinlee South,
Ballingayrour,
Ballinbea, Knockuregare, Balinese North, Carrigeen and Camas South, Bruff, Co.
Limerick**

Dear Ms. O' Connor,

I refer to your email dated 5th September 2024 regarding the above project, in which you sought comments or observations from this office.

OPW Drainage Maintenance comments on this proposed project are in relation to the Office of Public Works' statutory duty to maintain the Drainage Scheme under the Arterial Drainage Act. Further submissions may be made by the OPW concerning the estate portfolio, heritage and other areas of responsibility.

**OPW**Oifig na
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The site indicated on the maps provided intersects with a number of our channels C1/31, C1/31/4, C1/31/4/2/1, C1/31/5, C1/31/6, C1,31/1/1, C1/31/5/1, C1/31/5/1/4, C1/31/5/1/3, C1/31/5/1/2, C1/31/5/1/1 and C1/31/7 the Maigne Scheme for which maintenance responsibility lies with this office. In order to gain access for the purpose of maintaining said channels, this office requests that the following be included in any submission for planning permission at this location.

Any alterations or modifications of drainage channels would require section 9 consent of the Arterial Drainage Amendment Act, 1995

Obtaining Section 9 consent information on the process, including copies of the appropriate application form and brochure, are available on our website at

<https://www.gov.ie/en/publication/957aa7-consent-requirements-constructionalteration-of-watercourseinfrastru/watercourseinfrastru/>

Condition for maintenance:

A 10 Metre wide strip of land running parallel to the main channels C1/31 and a 5 Metre wide strip of land running parallel to the channels C1/31/4, C1/31/4/2/1, C1/31/5, C1/31/6, C1,31/1/1, C1/31/5/1, C1/31/5/1/4, C1/31/5/1/3, C1/31/5/1/2, C1/31/5/1/1 and C1/31/7 should be provided to facilitate access and maintenance activities by this office in the immediate area. This area should be accessible to mechanical plant and should not be landscaped, paved or otherwise developed in a manner that would prevent access.

The site indicated on the map proposed for the project falls within the area deemed to benefit from drainage by channels C1/31, C1/31/4, C1/31/4/2/1, C1/31/5, C1/31/6, C1,31/1/1, C1/31/5/1, C1/31/5/1/4, C1/31/5/1/3, C1/31/5/1/2, C1/31/5/1/1 and C1/31/7 of the Maigne Drainage scheme. As a result, it may be subject to an increased flood risk.

Any new culverts or bridges (or modifications to any existing culverts or bridges) are required to cross watercourses as part of the development or on proposed or existing access roads to serve or access the development; you should be aware that these require consent from the Commissioners of Public Works. This is a requirement of Section 50 of the Arterial Drainage Act of 1945 as amended.

Obtaining Section 50 consent information on the process, including copies of the appropriate application form and brochure, are available on our website at

<https://www.gov.ie/en/publication/957aa7-consent-requirements-constructionaltera>

**OPW**Oifig na
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Please note that, in the context of seeking consent under Section 50, the current required design standard for bridges or culverts is based on the flood with an annual exceedance probability of 1% (often referred to as the 100 year flood), increased by 20% to cater for the effects of Climate Change. Bridges or culverts are required to be able to convey this design flood without significantly altering the hydraulic characteristics of the watercourse – further details on this issue are available in the brochure and can be clarified depending on the circumstances of any particular proposed bridge or culvert.

You should be aware that a grant of Planning Permission by a planning authority for a development which contains bridges or culverts does not confer section 50 consent on the applicant, nor does it absolve the applicant from the requirement to obtain such consent from the Commissioners.

Regarding the proposed Internal wind farm underground power and communications cabling route indicated in your documentation but the location not provided, it is possible that this route may cross several watercourses. If the cable and ducting are to be buried in the road as they cross bridges over the water courses, and there is no interference with the opening in the bridge spanning the watercourse, then there is no issue. On the other hand, if it is proposed to pass the cable in its ducting through the opening of any bridge or culvert, this would be considered to be a modification of a bridge and it would require the consent of the Commissioners under Section 50 as mentioned above.

Similarly, if it is proposed to carry the cable in its ducting across watercourses on new support structures spanning the watercourses, these should be treated as if they are bridges, and the consent of the commissioners under Section 50 should be obtained. If the cable and ducting are to be buried under the natural bed of the watercourses being crossed, Section 50 would not apply, and we would recommend that the duct be buried a sufficient distance below the natural bed to allow for erosion and mobility of the stream bed.

We would recommend that a flood risk assessment be carried out with regard to the proposed development and its construction. This should consider all sources, pathways and receptors of flood risk. This should be carried out in accordance with the principles set out in the guideline document “The Planning System and Flood Risk Management” as published by the Minister for the Environment, Heritage and Local Government and the Office of Public Works. Please be aware that this is a separate issue from the requirement to obtain Section 50 consent, as mentioned above.

**OPW**

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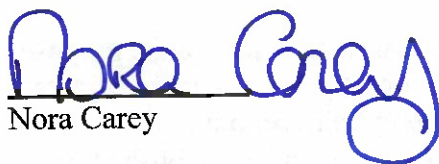
In terms of the preparation of an EIA, the matters referred to above principally relate to the Hydrology Section, and the Risk of Flooding on a development such as this can impact on Landscape (e.g. landslides that have been reported in recent years), Infrastructure (roads and

bridges) and people and their homes, among other things. The aim of the Section 50 process and the Flood Risk Assessment, which is recommended, would be to mitigate any increased risk of flooding and the consequences of same, as arising from the proposed development.

Please use the reference number indicated above in any further correspondence with the office on this matter.

Signed on behalf of the Commissioners of Public Works in Ireland.

Yours sincerely


Nora Carey

September 16th 2024

Flood Project Management

MWP
Reen Point
Blennerville
Tralee, Co. Kerry



**Iascach Intíre Éireann
Inland Fisheries Ireland**

V92 X2TK

23.09.2024

Re: Ballinlee Green Energy Project Consultation Request

Dear Aileen,

Thank you for the opportunity to comment on the proposed Ballinlee green energy project, Bruff, Co. Limerick. The Morningstar is an important salmonid spawning river as well as providing excellent trout angling river. The primary concern is the protection of the instream and riparian habitat and the water quality of the Morningstar.

IFI is the statutory body mandated to ensure that the fisheries of the State are protected. "Fisheries" includes all inland fisheries recreational and commercial, sea angling and mollusc fisheries stipulated under the Fisheries Acts, the physical habitat upon which the fishery relies, the facilities and access, the quantity and quality of the water and the plant and animal life on which fish depend for shelter and food and the spawning areas where fish deposit their eggs. The protective role of IFI relates to all aspects of the aquatic environment and all factors that influence the biotic communities within waters, which in any way relate to the propagation of fish stocks.

Any crossing of the Morningstar must be clear-span in nature with all drainage directed away from the bridge for treatment before returning the river.

IFI believe there is substantial scope for river habitat improvement and biodiversity net-gain through restoration of the riparian corridor along the Morningstar. Thermal stress for brown trout begins when water temperatures exceed 19°C with thermal stress for Atlantic salmon beginning slightly higher at 22°C. Climate change predictions for Ireland include higher temperatures with a reduction in summer rainfall. This combines to increase the vulnerability of salmonids to climate change and highlights the importance of increased tree shading for our rivers. Restoring the riparian corridor will provide shade and refuge from thermal stress for future generations of salmonids and other species.



Iascach Intíre Éireann
Inland Fisheries Ireland

A healthy riparian has myriad other functions such as maintaining bank stability, filtering excess nutrients and reducing floodwater velocities. Any planting will be particularly important on the southern riverbank.

To protect water quality, IFI also submit that cattle drinkers should be closed off along the project stretch and alternative drinkers provided where the lands will still be grazed.

Finally, the project must consider fishing access and passage along the riverbanks by staff of Inland Fisheries Ireland

IFI reserve the right to make further submissions during the planning phase.

Yours sincerely,

Jane Gilleran

.....
Jane Gilleran
Senior Fisheries Environmental Officer
Inland Fisheries Ireland, Limerick



Iascach Intíre Éireann
Inland Fisheries Ireland





Outlook

FW: 22635 - Request for Consultation in regards to proposed SID development in Limerick

From Environmental Co-ordination (Inbox) <Environmental_Co-ordination@agriculture.gov.ie>

Date Mon 10/14/2024 9:46 AM

To Aileen O'Connor <aileen.o'connor@mwp.ie>

Good Morning,

The Department welcomes the opportunity to provide input to this application. It seems this activity does not fall within the remit of the EIA (Agriculture) Regulations under DAFM and therefore, once relevant environmental and planning regulations are met, DAFM has no comment at this stage of the consultation process.

Regards,

Environmental Co-ordination Unit

From: Info <Info@agriculture.gov.ie>

Sent: Thursday, September 5, 2024 9:00 AM

To: Environmental Co-ordination (Inbox) <Environmental_Co-ordination@agriculture.gov.ie>

Cc: Info <Info@agriculture.gov.ie>

Subject: FW: 22635 - Request for Consultation in regards to proposed SID development in Limerick

Importance: High

Hello,

Please see query below received to our information email address, for direct reply. If this is not relevant to your area please let me know.

Thank you

Kind Regards,

Niall Magee

Clerical Officer / Communications and Corporate Affairs Division

An Roinn Talmhaíochta, Bia agus Mara

Department of Agriculture, Food and the Marine

An Teach Talmhaíochta, Sráid Chill Dara, Baile Átha Cliath 2, D02 WK12

Agriculture House, Kildare Street, Dublin 2, D02 WK12

M +353 (0)873970343 T +353 (0)1 607 2570

gov.ie - [Department of Agriculture, Food and the Marine \(www.gov.ie\)](http://www.gov.ie)

From: Aileen O'Connor <aileen.o'connor@mwp.ie>

Sent: Wednesday, September 4, 2024 9:17 PM

To: Info <Info@agriculture.gov.ie>

Cc: Caoimhe O'Connor <Caoimhe.o'connor@mwp.ie>

Subject: 22635 - Request for Consultation in regards to proposed SID development in Limerick

Importance: High

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To whom it concerns,

Attached is a consultation letter and preliminary project description in relation to a Strategic Infrastructure Development (SID) for a proposed Wind Farm development for your attention.

Should you require any further information please contact the undersigned.

Can you please confirm receipt of this email.

Thanks in advance,

Kind Regards,

Aileen O'Connor

Senior Environmental Consultant

e aileen.oconnor@mwp.ie

t +353 (0)66 7123404 w www.mwp.ie

Reen Point, Blennerville,
Tralee, Co. Kerry, V92 X2TK, Ireland

MWP

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An Roinn Talmhaíochta, Bia agus Mara

Tá an t-eolas sa ríomhphost seo, agus in aon cheangaltáin leis, faoi rún agus tá sé dírithe ar an bhfaighteoir/na faighteoirí beartaithe amháin agus níor cheart ach dóibh siúd é a úsáid. D'fhéadfadh an t-eolas seo a bheith faoi réir pribhléid dhlíthiúil agus ghairmiúil. Mura tusa faighteoir beartaithe an ríomhphost seo, níor cheart duit an teachtaireacht seo, nó aon chuid di, a úsáid, a nochtadh, a chóipeáil, a dháileadh nó a choinneáil. Má fuair tú an ríomhphost seo go hearráideach, cuir an seoltóir ar an eolas láithreach agus scríos gach cóip den ríomhphost seo ó chóra(i)s do ríomhaire, le do thoil.



MWP
Reen Point
Blennerville
Tralee
Co Kerry V92X2TK

04TH October 2024

Re: Ballinlee Windfarm Strategic Infrastructure Development near Ballincurra, Ballinlee South, Ballingayroure, Ballinbea, Knockuregare, Ballinlee North, Carrigeen & Camas South, Co Limerick

Dear Sir/Madam,

The following are the comments from this Division in relation to the proposed development:

If the proposed development will involve the felling or removal of any trees, the developer must obtain a Felling Licence from this Department before trees are felled or removed. A Felling Licence application form can be obtained from the Department's website link here: [gov.ie - Tree Felling Licences \(www.gov.ie\)](http://gov.ie - Tree Felling Licences (www.gov.ie))

A Felling Licence granted by the Minister for Agriculture, Food and the Marine provides authority under the Forestry Act 2014 to fell or otherwise remove a tree or trees and/or to thin a forest for silvicultural reasons. The Act prescribes the functions of the Minister and details the requirements, rights and obligations in relation to felling licences. The principal set of regulations giving further effect to the Forestry Act 2014 are the Forestry Regulations 2017 (S.I. No. 191 of 2017).

The developer should take note of the contents of **Felling and Reforestation Policy** document which provide a consolidated source of information on the legal and regulatory framework relating to tree felling; [gov.ie - Tree Felling Licences \(www.gov.ie\)](http://gov.ie - Tree Felling Licences (www.gov.ie)) As this development is within forest lands, particular attention should be paid to deforestation, turbulence felling and the requirement to afforest alternative lands.

In order to ensure regulated forestry operations in Ireland accord with the principles of sustainable forest management (SFM), as well fulfilling the requirements of other relevant environmental protection laws, the Department (acting through its Forest Service division) must undertake particular consultations, and give certain matters full consideration during the assessment of individual Felling Licence applications. This includes consultation with relevant bodies, the application of various protocols and procedures (e.g. Forest Service Appropriate Assessment Procedure), and the requirement for applicants on occasion to provide further information (e.g. a Natura Impact Statement).

Consequently, when the Forest Service is considering an application to fell trees, the following applies:

1. The interaction of these proposed works with the environment locally and more widely, in addition to potential direct and indirect impacts on designated sites and water, is assessed. Consultation with relevant environmental and planning authorities may be



required where specific sensitivities arise (e.g. local authorities, National Parks & Wildlife Service, Inland Fisheries Ireland, and the National Monuments Service);

2. Where a tree Felling Licence application is received, the Department will publish a notice of the application before making a decision on the matter. The notice shall state that any person may make a submission to the Department within 30 days from the date of the notice. The notices are published online at: gov.ie - Felling Licence Applications (www.gov.ie)
3. Third parties that make a submission or observation will be informed of the decision to grant or refuse the licence, and on request, details of the conditions attached to the licence, the main reasons and considerations on which the decision to grant or refuse the licence was based, and where conditions are attached to any licence, the reasons for the conditions. Both third parties and applicants will be also informed of their right to appeal any decision within 14 days to the Forestry Appeals Committee. Felling Licence decision are published on the Departments Forestry Licence Viewer (9FLV) link here: [Forestry Licence Viewer \(agriculture.gov.ie\)](http://Forestry Licence Viewer (agriculture.gov.ie))

It is important to note that when applying to a **Local Authority**, or **An Bord Pleanála**, for planning permission where developments are:

- a) subject to an EIA procedure (including screening in the case of a sub-threshold development) and any resulting requirement to produce an EIAR; and/or
- b) subject to an Appropriate Assessment procedure (including screening) and any resulting requirement to a Natura Impact Statement (NIS); and
- c) the proposed development in its construction or operational phases, or any works ancillary thereto, would directly or indirectly involve the felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species,
 1. that there is a requirement inter alia under the EIA Directive for an overall assessment of the effects of the project or the alteration thereof on the environment to be undertaken, including the direct and indirect environmental impact of the project;

and

2. pursuant to Article 2(3) of the EIA Directive, the Department of Agriculture, Food and the Marine strongly recommends that, notwithstanding the fact that a parallel consent in the form of felling licence may also have to be applied for, any EIAR and/or NIS produced in connection with the application for planning permission to the Local Planning Authority or An Bord Pleanála, should include an assessment of the impact of and measures, as appropriate, to prevent, mitigate or compensate for any significant adverse effects direct or indirect identified on the environment arising from such felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species.



3. Please note that there must be absolute spatial consistency between the felling licence areas submitted to DAFM (second authority) and all related planning documents submitted to the first authority in respect of the felling area(s)

pp. Ciaran Walsh

Neil O'Brien

Higher Executive Officer

Felling Section



Your Ref: **22635**

Our Ref: **G Pre00295/2024** (Please quote in all related correspondence)

21 October 2024

Malachy Walsh & Partners
Engineering & Environmental Consultants
Reen Point
Blennerville,
Tralee
Co. Kerry
V92 X2TK

Via email: aileen.o'connor@mwp.ie

Proposed Pre Planning Development: Consultation in relation to a Strategic Infrastructure Development (SID) for a proposed Wind Farm: Ballincurra, Ballinlee South, Ballingayrour, Ballinbea, Knockuregare, Ballinlee North, Carrigeen and Camas South approximately 18km southeast of Limerick City and 4km west of Bruff, Co. Limerick

A chara

I refer to correspondence received in connection with the above. Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

Archaeology (Underwater)

Please note this submission provides general recommendations relating to the assessment of archaeological heritage for the project assessment and is provided without prejudice to further observations and recommendations from this Department. The Department will comment in detail on subsequent consultations and planning submissions.

It is noted that the proposed development includes a number of rivers and streams that are located within a concentration of recorded archaeological monuments. In light of the potential for significant effects on underwater cultural heritage arising from the project we recommend that a programme of pre-development underwater archaeological assessment should be scoped into the design process. The underwater archaeology assessment should be carried out at the earliest possible stage to facilitate the embedding of any recommended further mitigation within the detailed design for the project, as necessary, in order to ensure the preservation in-situ of any identified/potential underwater cultural heritage and to develop an



informed archaeological strategy to be implemented in agreement with the Department. Underwater assessment should include all in-stream/riverbank works, enabling works, coffer dams and machinery movements that may affect the river channel and/or river banks, as set out below.

Nature Conservation

The Department is not in a position to make specific comment on this particular referral at this time. No inference should be drawn from this that the Department is satisfied or otherwise with the proposed activity. The Department may submit observations/recommendations at a later stage in the process.

The above observations/recommendations are based on the papers submitted to this Department on a pre-planning basis and are made without prejudice to any observations that the Minister may make in the context of any consultation arising on foot of any development application referred to the Minister, by the planning authority/ies, in the role as statutory consultee under the Planning and Development Act, 2000, as amended.

You are requested to send further communications to the Development Applications Unit (DAU) at manager.dau@housing.gov.ie.

Is mise le meas,

Diarmuid Buttimer
Development Applications Unit
Administration



Outlook

TII Ref: TII24-128441 - TII24-128621 - Strategic Infrastructure Development (SID) for a proposed Wind Farm Ballincurra, Ballinlee, Ballingayrou, Co. Limerick

From INFO <Information@tii.ie>

Date Mon 9/16/2024 10:51 AM

To Aileen O'Connor <aileen.o'connor@mwp.ie>

Dear Ms. O'Connor,

Thank you for your correspondence of 4 September 2024 regarding the above. Transport Infrastructure Ireland's (TII's) position in relation to your enquiry is as follows.

TII will endeavour to consider and respond to planning applications referred to it, given its status and duties as a statutory consultee under the Planning Acts. The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidelines, as outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). Regard should also be had to other relevant guidance available at www.TII.ie.

The issuing of this correspondence is provided as best practice guidance only and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals, following the examination of any valid planning application referred.

National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national roads network. In addition, Chapter 7 'Enhanced Regional Accessibility' of the National Development Plan, 2021 – 2030, sets out the key sectoral priority of maintaining Ireland's existing national road network to a robust and safe standard for users. This requirement is further reflected in the publication of the National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

With respect to EIAR Scoping issues, the recommendations indicated below provide only general guidance for the preparation of an EIAR, which may affect the national road network.

The developer should have regard, inter alia, to the following:

- Consultations should be had with the relevant Local Authority/National Roads Design Office, with regard to the locations of existing and future national road schemes in the area.
- TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development, including the potential haul route.
- The developer should assess visual impacts from existing national roads.
- The developer should have regard to any EIAR/EIS and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area. The developer should, in particular, have regard to any potential cumulative impacts.
- The developer, in preparing EIAR, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works).

- The EIAR should have regard to TII's Environmental Assessment and Construction Guidelines, including the Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes (National Road Authority (NRA), 2014).
- The EIAR should consider the 'European Communities (Environmental Noise) Regulations, 2018, (S.I. no. 549 of 2018)', and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see 'Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes (NRA, 2014)').
- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the national road network and junctions of lower category roads with national roads.

In relation to national roads, TII's TTA Guidelines (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the NRA/TII TTA Guidelines which addresses requirements for sub-threshold TTA.

Any improvements required to facilitate development should be identified. It will be the responsibility of the developer to pay for the costs of any improvements to national roads to facilitate the private development proposed as TII will not be responsible for such costs.

- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required.
- In the interests of maintaining the safety and standard of the national road network, the EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network.
- In relation to haul route identification, TII recommends that the applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Where abnormal 'weight' loads are a feature of the development, e.g. turbine, substation or BESS components, separate structure approvals/permits and other licences may be required in connection with the proposed haul route. All national road structures on the haul route through all the relevant County Council administrative areas should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal 'weight' load proposed. Any requirements for 'Exceptional Abnormal Loads' should also be addressed in accordance with TII Publications.

In addition, the haul route should be assessed to confirm capacity to accommodate abnormal 'length' loads and any temporary works required are identified.

The national road network is managed by a combination of PPP Concessions, Motorway Maintenance and Renewal Contractors (MMaRC) and local road authorities, in association with TII.

The applicant/developer should also consult with all PPP Companies, MMaRC Contractors and road authorities over which the haul route traverses, to ascertain any operational requirements, including delivery timetabling, etc., to ensure that the strategic function of the national road network is safeguarded.

Where temporary works within any MMaRC Boundary are required to facilitate the transport of turbine components to site, the applicant/developer shall contact thirdpartyworks@tii.ie in advance, as a works specific Deed of Indemnity will be needed by TII before the works can take place.

Additionally, any damage caused to the pavement on the existing national road arising from any temporary works due to the turning movement of abnormal loads (e.g., tearing of the surface

course, etc.) shall be rectified in accordance with TII Pavement Standards and details in this regard shall be agreed with the road authority prior to the commencement of any development on site.

Any Road Safety Audit requirements should be addressed.

- Grid connection and cable routing proposals should be developed to safeguard proposed road schemes, as TII will not be responsible for costs associated with future relocation of cable routing where proposals are catered for in an area of a proposed national road scheme. In that regard, consideration should be given to routing options, use of existing crossings, depth of cable laying, etc.

Grid connection proposals indicated in your EIAR Scoping referral documentation outline a proposed connection to the Killonan Substation, but no routing details are indicated.

In the interest of clarification, should grid routing proposals alter to an extent as to result in impact to the existing national road network, please note, in accordance with the National Planning Framework National Strategic Outcome No. 2 'Enhanced Regional Accessibility', there is a requirement to maintain the strategic capacity and safety of the network. This requirement is further reflected in the NDP, the National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 'Spatial Planning and National Roads Guidelines for Planning Authorities'.

There is around 99,000km of roads in Ireland. The national road network, which caters for strategic inter-urban travel, consists of only approx. 5.4% of this. There is a critical requirement to ensure the strategic capacity and safety of this national road network is maintained and significant Government investment already made in the national road network is safeguarded.

The provision of cabling along the national road network represents a number of significant implications for TII and road authorities in the management and maintenance of the strategic national road network and TII is of the opinion that grid connection cable routing should reflect the foregoing provisions of official policy.

Section 12.4.1.1 'Accelerate Renewable Electricity Generation' of the Climate Action Plan 2024 (CAP24) outlines the objective of reaching 80% of electricity demand from renewable sources by 2030 through a range of measures, including:

"All relevant public bodies will carry out their functions in a manner which supports the achievement of the renewable electricity targets, including, but not limited to, the use of road and rail infrastructure to provide a route for grid infrastructure where this is the optimal solution". (Climate Action Plan 2024, p.163)

Consistent with CAP24, for all renewable energy developments requiring grid connection to the national grid, TII recommends that a full assessment of all route alternatives for grid connection takes place, including alternatives to public road, where appropriate. In TII's experience, grid connection accommodated on national roads has the potential, inter alia, to result in technical road safety issues such as differential settlement due to backfilling trenches and can impact on ability and cost of general maintenance, upgrades and safety works to existing national roads.

Having regard to the foregoing, in TII's opinion, the grid connection routing, where it is proposed to utilise the road network, must demonstrate that the route proposed represents the 'optimal solution'. In addition, there is a finite road space available to accommodate all utilities in the road network and TII recommends that a co-ordinated approach to grid connection routing in this area is achieved to avoid risk to the effective delivery of renewable energy projects in the area.

Other consents or licences may be required from the road authority for any trenching or cabling proposals crossing the national road. TII requests referral of all proposals agreed and licensed between the road authority and the applicant, which affect the national road network.

Cable routing should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, etc. and works required to such infrastructure shall only be undertaken in

consultation with and subject to the agreement of TII. Any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network.

Notwithstanding any of the above, the developer should be aware that this list is non-exhaustive, thus site and development specific issues should be addressed in accordance with best practice.

I hope that this information is of assistance to you.

Yours sincerely,

Suzanne Cahill
Regulatory & Administration Executive

From: Aileen O'Connor <aileen.o'connor@mwp.ie>
Sent: Wednesday, September 4, 2024 9:50 PM
To: INFO <Information@tii.ie>
Cc: Caoimhe O'Connor <Caoimhe.o'connor@mwp.ie>
Subject: 22635 - Request for Consultation in regards to proposed SID development in Limerick
Importance: High

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To whom it concerns,

Attached is a consultation letter and preliminary project description in relation to a Strategic Infrastructure Development (SID) for a proposed Wind Farm development for your attention.

Should you require any further information please contact the undersigned.

Can you please confirm receipt of this email.

Thanks in advance,

Kind Regards,

Aileen O'Connor
Senior Environmental Consultant

e aileen.oconnor@mwp.ie
t +353 (0)66 7123404 w www.mwp.ie

Reen Point, Blennerville,
Tralee, Co. Kerry, V92 X2TK, Ireland



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Serena O'Donnell

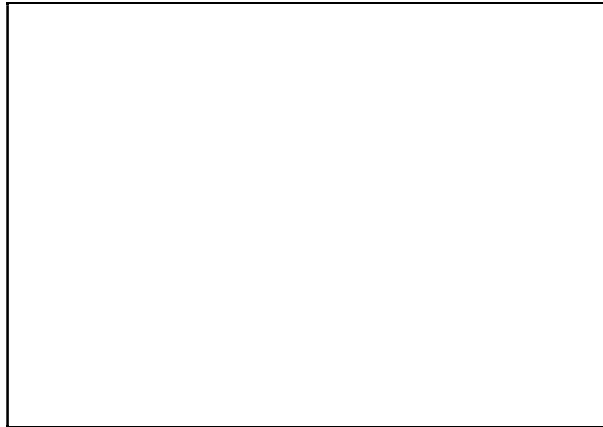
Subject: CASE [1006940]: SID Pre Planning Request Ballincurra, Ballinlee South, Ballingayroure, Ballinbea, Knockuregare, Ballinlee North, Carrigeen and Camas South approximately 18km southeast of Limerick City and 4km west of Bruff, Co. Limerick. Case Closed

From: Limerick City and County Council Notifications (DO NOT REPLY) <dynamicscrm.mail@limerick.ie>

Sent: Wednesday 20 November 2024 13:53

To: Aileen O'Connor <aileen.o'connor@mwp.ie>

Subject: CASE [1006940]: SID Pre Planning Request Ballincurra, Ballinlee South, Ballingayroure, Ballinbea, Knockuregare, Ballinlee North, Carrigeen and Camas South approximately 18km southeast of Limerick City and 4km west of Bruff, Co. Limerick. Case Closed



Customer Services

Case Number: 1006940

Received: 10/09/2024 11:34

Status: Resolved

Re: SID Pre Planning Request Ballincurra, Ballinlee South, Ballingayroure, Ballinbea, Knockuregare, Ballinlee North, Carrigeen and Camas South approximately 18km southeast of Limerick City and 4km west of Bruff, Co. Limerick.:

Dear Ms. Aileen O'Connor,

I refer to your correspondence received on **10/09/2024 11:34** relating to the above mentioned case. The status of your case has now been updated to **Resolved** Please note the Council's response as follows:

Email saved in log

Please quote **case number 1006940** should you wish to make further contact regarding this issue in the future.

Kind Regards,
Customer Services Team

Phone: +353 61 556000

email: customerservices@limerick.ie

Twitter: [@LimerickCouncil](https://twitter.com/LimerickCouncil)

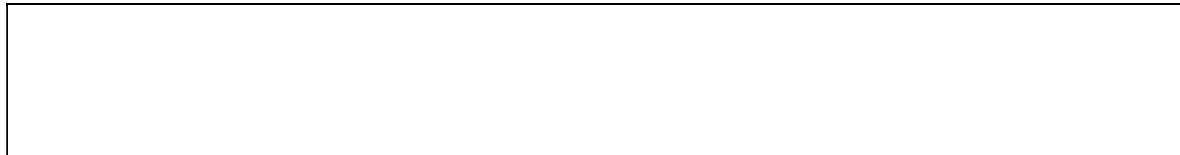
www.limerick.ie/council

Office Hours: Monday - Friday 9 a.m. to 5 p.m.

Emergency Only: +353 61 417833 (outside office hours)

[Limerick City & County Council Disclaimer](#)

Local Authority of the Year 2023



Development Applications Unit
Department of Housing, Local Government and Heritage
Custom House
Dublin, D01 W6X0
Email to: manager.dau@npws.gov.ie

30 April 2025

Development Applications Unit (DAU) Consultation Request

Re: Pre-planning consultation request in relation to a proposed wind farm development at Ballinlee, Co. Limerick

Ref: G Pre00295/2024

APEM Group Woodrow, on behalf of the applicant; Ballinlee Green Energy Ltd. (a subsidiary of Greensource Sustainable Developments Ltd) requests a DAU response from NPWS with respect to a proposed wind farm development at Ballinlee, Co. Limerick.

A previous consultation on the proposed wind farm scoping report has been received from the department in 2024 (Ref: G Pre00295/2024).

This consultation request provides an overview of the design-freeze layout in DRAFT format and the proposed Whooper Swan Management Plan (WSMP) which will accompany the Environmental Impact Assessment Report (EIAR).

The proposal is for the construction and operation of up to 17-turbine wind farm development including grid route and 110kV substation. The site overview with proposed wind farm layout is shown in Figure 1. An overview of the WSMP lands within the site context has been provided within Figure 2.

A whooper swan population of local importance has been identified using the northern section of the proposed development site, in an area known as Camas South. To inform the proposed development, and in addition to a full suite of ornithology surveys, specific whooper swan surveys were undertaken in line with NatureScot guidance¹ over three consecutive winters. During the 2021-22 winter season, a peak count of 51 whooper swans were recorded feeding within the proposed development in fields along the Morningstar River, in the area known as Camas South. The 2022-23 winter season recorded

¹ NatureScot, formerly Scottish Natural Heritage (SNH), (2017). *Recommended Bird Survey Methods to Inform Impact Assessment of Onshore Wind Farms*. Updated: March 2025

a peak of 33 swans in the same area and the 2023-24 winter season recorded a peak count of 39 swans.

These whooper swans comprise a sub-flock of the Lough Gur population which roost on Lough Gur and predominantly feed between fields at Camas South, 6 km southwest of the roost, and fields at Ballycullane, 4 km northwest of the roost. The population has been surveyed extensively to inform the proposed development and are not part of any Special Protection Area (SPA) population. Figure 3 shows the distribution of feeding whooper swan in the vicinity of Camas South, and regular whooper swan flightlines between the roost site and feeding fields at Camas South.

Whooper swan activity has been considered from the outset of the proposed development design. To reduce collision risk, turbines have been omitted from the prevailing flight path used by swans (see Figure 3). In addition, the placement of turbines outside of the prevailing flight path aims to maintain connectivity to feeding fields south of the Morningstar River that occur outside the proposed development site. There remains a collision risk and potential displacement effect for whooper swan feeding in the vicinity of Turbine no. 3. As a result, to minimize population level effects, a considered Whooper Swan Management Plan (WSMP) has been developed. See Figure 2 for WSMP lands.

The aim of the WSMP is to alter whooper swan behaviour and encourage them into feeding fields a sufficient distance from the turbine array at the WSMP lands. Fields selected for the WSMP have been carefully chosen based on their location along the prevailing flight path, proximity to existing feeding fields and landscape appropriateness for whooper swan e.g. flat, open topography with no to little hedgerows/treelines which could impair long-range visibility, grassland habitat that provides sufficient nutritional value, a nearby source of freshwater and minimal disturbance. The selected fields will be further enhanced for whooper swan through reseeding of rye grass species, sward management and management of any scrub present.

The WSMP has been developed to ensure long-term feasibility in future landscape scenarios. Measures set out in the WSMP will be implemented for the lifetime of the proposed development. Where necessary the plan will be altered and remedial actions taken based on information gathered during post-construction monitoring.

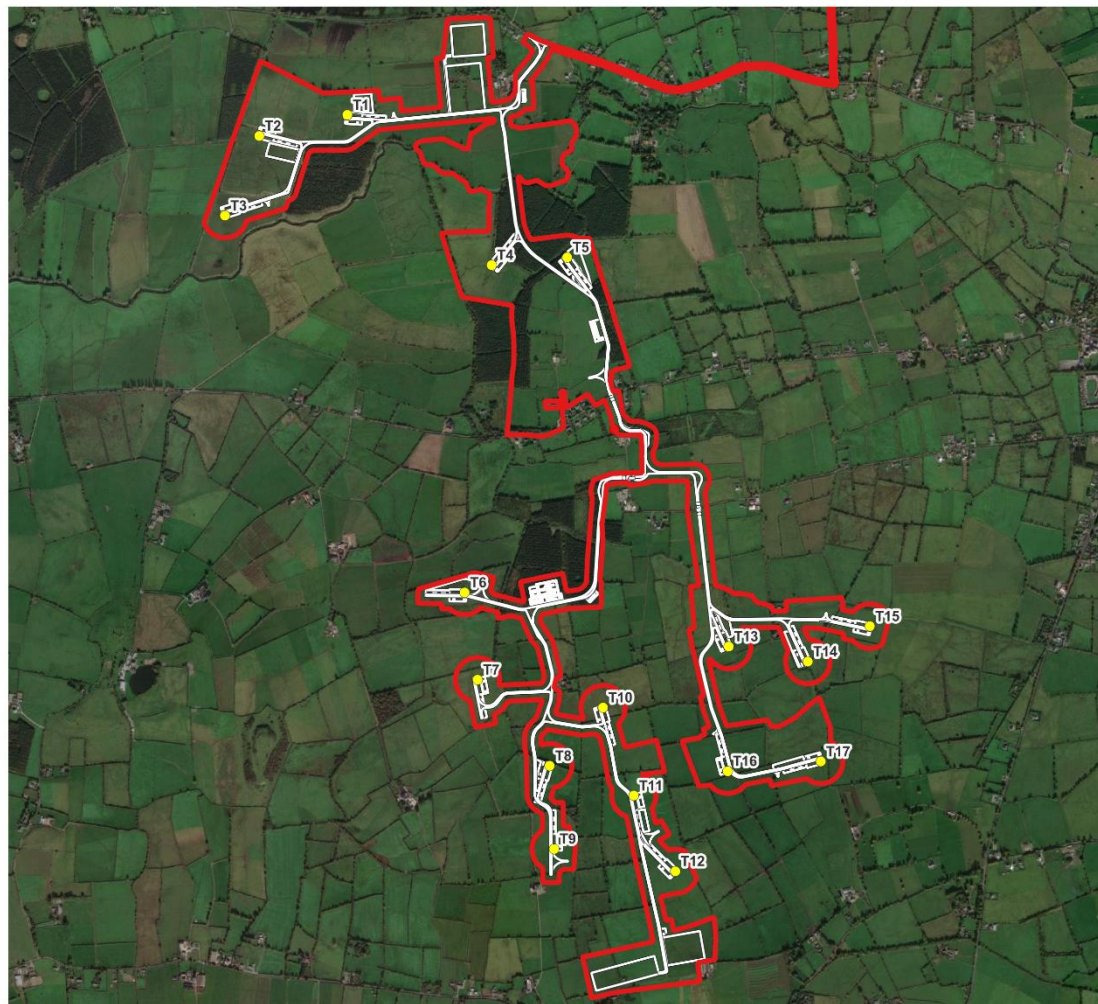
A Habitat and Species Management, cognisant of the WSMP, will be submitted with the application and has been developed for wider biodiversity gains as part of the proposed development.

We would appreciate any feedback National Parks and Wildlife Service (NPWS) can provide on the approach and Whooper Swan Management Plan measures outlined within this letter for the proposed Ballinlee Wind Farm, Co. Limerick.

Kind regards,

Maeve Maher-McWilliams BSc MSc

Associate Director



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Ballinlee Green Energy

Overview of Ballinlee Wind Farm

Legend

-  Planning Application Boundary
-  Site Layout
-  Turbine Locations



0 300 600 m



Scale: 1:23500 Date: 29/04/2025 Drawn by: AW Approved by: MMM

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Figure 1: Proposed Wind Farm DRAFT Layout



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Ballinlee Green Energy

Whooper Swan Management Area

Legend

- ▬ Planning Application Boundary
- Whooper swan Management Plan Lands
- Morningstar River
- Site Layout
- Turbine Locations



0 100 200 m



Scale: 1:11190 Date: 29/04/2025 Drawn by: AW Approved by: MMM

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Figure 2: Overview of DRAFT BEMP Lands

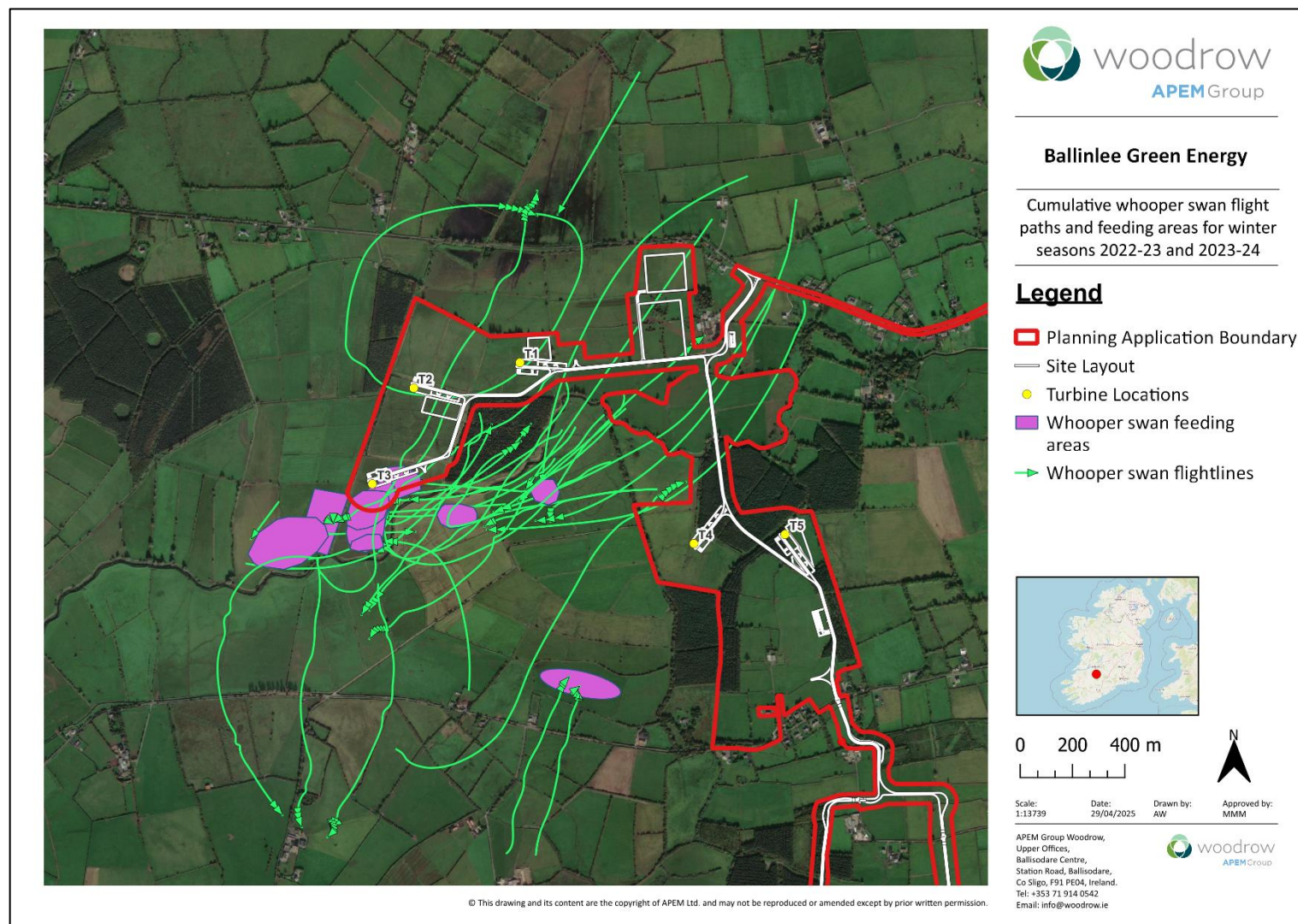


Figure 3: Overview of whooper swan activity during winter seasons 2022-23 and 2023-24



Your Ref: **22635**

Our Ref: **G Pre00295/2024** (Please quote in all related correspondence)

25 June 2025

Malachy Walsh & Partners
Engineering & Environmental Consultants
Reen Point
Blennerville,
Tralee
Co. Kerry
V92 X2TK

Via email: M.Maher-McWilliams@woodrow.ie aileen.o'connor@mwp.ie

Proposed Pre Planning Development: Consultation in relation to a Strategic Infrastructure Development (SID) for a proposed Wind Farm: Ballincurra, Ballinlee South, Ballingayrou, Ballinbea, Knockuregare, Ballinlee North, Carrigeen and Camas South approximately 18km southeast of Limerick City and 4km west of Bruff, Co. Limerick

A chara

I refer to correspondence received in connection with the above requesting further consultation. Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

Nature Conservation

Further consultation in relation to the identified usage of the proposed development site by Whooper Swans (Annex I), an Amber listed species¹. It is noted that the Whooper flock feeding at the proposed development site is part of the Whooper population at Lough Gur, which is a Wildfowl Sanctuary and a proposed Natural Heritage Area for, *inter alia*, its waterfowl population including Whooper Swans.

Visual disturbance

A disturbance buffer of between 200m and 600m has been recommended for Whooper Swans (NatureScot, 2022)², and the guidelines recommend the use of the upper limit of the range unless a lower value can be shown not to result in disturbance. The inherent wariness

¹ Gilbert, G; Stanbury, A and Lewis, L (2021) Birds of Conservation Concern in Ireland 4: 2020 – 2026. *Irish Birds* 43: 1 – 22

² NatureScot (2022) *Disturbance Distances in selected Scottish bird species*. NatureScot Guidance



and “alert” behaviour of Whooper Swans in response to visual disturbance or sudden changes in their field of view, and the scale and high visibility (due to the flat topography) of a constantly rotating wind turbine in the vicinity, would indicate strongly that the upper end of the distance range is appropriate in this case.

Applying a 600m buffer for the three closest turbines to the proposed alternative feeding site, it would appear that only 30 – 40% of the proposed site would be a sufficient distance from the turbines and therefore suitable for use by the swans. Even allowing for the forestry to the south of the site which may provide some buffering from visual disturbance from T₅, it seems likely that most of the western half of the site would have clear sightlines to T₁ or T₄ and therefore could potentially be unavailable as a feeding area due to disturbance. The proposed Whooper Management Plan is therefore likely to result in a decrease in feeding habitat area for the swans. In addition, the range of feeding sites that they currently use (indicated on the map provided) is proposed to be narrowed down to a single site, with limited options for switching to an alternative site in response to, for example, a change in weather conditions or temporary local disturbance (for example, vehicles travelling along the access road which bisects the proposed new feeding grounds).

Collision risk

Whooper Swans are considered to be particularly vulnerable to collision with wind turbines, and Birdwatch Ireland have assigned a “zone of sensitivity” of 600m radius around IWeBS (Irish Wetland Bird Survey) sites occupied by Whoopers³, which would include the IWeBS site at Lough Gur. There is an increased likelihood of collision in poor light conditions, including, for example, flights at dusk or dawn to and from roosting sites. Therefore, it would seem that allocating an alternative feeding site which is located between three turbines, much of which is at a distance (from the turbines) of considerably less than the zone of sensitivity, and improving its foraging quality to encourage the swans to use it, would introduce the risk of collision and in a sense could create an ecological trap, which would not be advisable.

It is noted from the map of flight paths provided that, while the majority of flights are to and from the northeast (presumably Lough Gur), there appears to be some through movement to the south/southwest. Depending on the ultimate destination(s) and timing of flights in this direction, this could potentially introduce the risk of collision with additional turbines, particularly T₆ and T₇ (and T₂ and T₃, if the swans tried to veer around the eastern side of the wind farm, rather than flying via the proposed alternative feeding area).

Integrity of Lough Gur population

The Whooper flock feeding on the proposed development site forms part of the Lough Gur population, and of the overall wetland bird community of Lough Gur. The 2021 – 2022 peak numbers using the proposed development site made up approximately 10% of the Co Limerick Whooper population as determined by the National Whooper Census carried out in

³ Mc Guinness, S., Muldoon, C., Tierney, N., Cummins, S., Murray, A., Egan, S. & Crowe, O. (2015). *Bird Sensitivity Mapping for Wind Energy Developments and Associated*



2020⁴, and peak counts at Lough Gur itself⁵ (which may not take into account birds feeding away from the lake) suggest that the entire Lough Gur population may contribute significantly more than this to the county total. Any negative impacts of the proposed development, through disturbance, displacement or collision, on the local flock, have the potential to affect the Lough Gur Whooper population as a whole.

The current proposed turbine layout and proposed new feeding site location does not seem to have taken into account the particular sensitivity of Whoopers to negative impacts from wind energy developments, or the importance of the current feeding habitat of this Annex I species along the flood plain of the Morningstar River.

Before adequate and appropriate mitigation proposals can be put forward, it will be necessary to obtain a detailed knowledge of the Lough Gur population in its entirety; including sub-flock interrelationships, habitat use within the wider area and the timing of movements between sites. The scope of mitigation may include (but not necessarily be limited to) development design and layout, scheduling of operation, and habitat management (but noting that any change in habitat structure that is likely to result in an increase in passerine or bat activity in the vicinity of the turbines, and consequent collision risks, is not recommended). The final development proposal should include a comprehensive assessment of the effectiveness of the specific mitigation measures in avoiding any negative impacts on Whooper Swans, taking into account overall flock dynamics as outlined above, and including, where relevant, examples from other developments where similar mitigation has been successfully applied.

You are requested to send further communications to the Development Applications Unit (DAU) at manager.dau@housing.gov.ie.

Is mise le meas,

A handwritten signature in black ink, appearing to read 'Diarmuid Buttimer', located below the text 'Is mise le meas,'.

Diarmuid Buttimer
Development Applications Unit
Administration

⁴ Brides, K, Wood, K A, Hall, C, Burke, B, McElwaine, G, Einarsson, Ó, Calbrade, N, Hill, O and Rees, E C (2021) The Icelandic Whooper Swan *Cygnus cygnus* population: current status and long-term (1986-2020) trends in its numbers and distribution. *Wildfowl* 71: 29 – 57

⁵ Tarpey, T (2024) *Wetland birds and wintering wildfowl in Limerick*. Birdwatch Ireland /World Wetlands Day presentation