

South West Arterial Drainage Maintenance & Construction

Teach Theampall Mungairit, Mungairit, Co Luimnigh
Templemungret House, Mungret, Co Limerick, V94 EK07
T +353 61 227 139



OPW

Oifig na
nOibreacha Poiblí
Office of Public Works

An Coimisiún Pleanála
64 Marlborough Street,
Dublin 1,
DO1 V902

Dear Sir/Madam

Please find attached an observation on SID Planning Application No. 323780, The Proposed Windfarm within the townlands of Ballincurra, Ballinlee South, Ballinqayrou, Ballinbea, Knockuregare, Ballinlee North, Carrigeen and Camas South, Bruff, County Limerick.

Regards Dennis O'Keeffe
19/05/26

AN COIMISIÚN PLEANÁLA	
LDG-	_____
ACP-	_____
21 MAY 2026	
Fee: €	_____ Type: _____
Time: 9:15	By: <i>neg rest</i>

AN COMMISSIONER, TEANAJA
LDC- _____
ACP- _____
21 MAY 2026
Fee: _____ Type: _____
Time: _____ By: _____



OPW

Oifig na
nOibreacha Poiblí
Office of Public Works

South West Arterial Drainage Maintenance & Construction

Teach Theampall Mungairit, Mungairit, Co Luimnigh
Templemungret House, Mungret, Co Limerick, V94 EK07
T +353 61 227 139

**To: An Coimisiún Pleanála
64 Marlborough Street,
Dublin 1,
DO1 V902**

O.P.W Ref No. 379-2024

Re: SID Planning Application No. 323780, The Proposed Windfarm within the townlands of Ballincurra, Ballinlee South, Ballinqayroure, Ballinbea, Knockuregare, Balinlee North, Carrigeen and Camas South, Bruff, Co. Limerick

Dear Sir/Madam,

I refer case SID application 323780

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,

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-watercourse-infrastru/>

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-constructionalteration-of-watercourse-infrastru/>

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.

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.

Yours sincerely,

Dennis O'Keeffe

19/05/26

Oifig na nOibreacha Poiblí
Office of Public Works

Teach Theampall Mungairit, Mungairit, Co Luimnigh, V94 EK07
Templemungret House, Mungret, Co Limerick, V94 EK07



Case Reference ACP PAX91.323780
Administrative Officer
Strategic Infrastructure Development Section,
An Coimisiún Pleanála,
64-67 Marlborough Street,
Dublin 1
D01 V90

20th May 2026

ACP- PAX91.323780: Proposed Wind Farm Development in the townlands of Ballincurra, Ballingayrou, Ballinlee North & South, Ballinrea, Ballyreesode, Camas North & South, Carrigeen, Knockuregare, Ballybane and other townlands in County Limerick

A Chara,

1.0 INTRODUCTION

The Office of Public Works (OPW) is a central Government Office operating under the Minister for Public Expenditure, NDP Delivery and Reform with particular responsibility for Flood Risk and Estate Management, including Heritage. The Office of Public Works (OPW) has responsibility for the care, operation and maintenance of all National Monuments in State Care. Our principal objective is to protect, conserve, maintain and present these sites and to facilitate appropriate public access where possible. In this regard, OPW works in partnership with the National Monuments Service at the Department of Housing, Local Government and Heritage (DHLGH).

This submission outlines observations from the OPW on the 'Strategic Infrastructure Development' (SID) application by Ballinlee Green Energy Limited, for a proposed renewable energy development which will comprise of 17 no. wind turbines, and a permanent 110kV substation and ancillary development in the townlands of Ballinlee and adjacent townlands in Co. Limerick.

This submission is made specifically with regard to the Heritage Services portfolio. Further submissions on the project may be made by the OPW with regards to other areas of responsibility.



2.0 PROPOSED WORKS (ACP - PAX91.323780)

The proposed development for which permission is being sought includes:

- Seventeen (17) No. wind turbines (turbine tip height of 160m, and 150m (T6 only)) with associated foundations and crane hardstand areas.
- One (1) No. Permanent Meteorological Mast (92m height) and associated foundation, hardstand area and ancillary main crane hardstand area.
- One (1) No. Electrical Substation (110kV) including Eirgrid compound, IPP, maintenance compounds, ancillary building, security fencing and all associated works.
- Nine (9) No. site entrances.
- New and upgraded internal site service tracks (approximately 10.8km of new internal access tracks to be constructed).
- New clear span bridge over the Morningstar River.
- Underground electric collector cable systems between turbines within the wind farm site.
- Underground electric cabling systems between the wind farm site and connection point at existing Killonan 220/110kV substation.
- New temporary access track via R-516 to facilitate the turbine delivery route located in the townland of Tullovin.
- Three (3) No. temporary construction site compounds (one approximately 95m x 50m and two approximately 55m x 25m).
- Two (2) No. borrow pits to be used as a source of stone material during construction and for storage of excess excavated materials.
- Nine (9) No. permanent and two (2) temporary deposition areas.
- Associated surface water management systems.
- Tree felling required for wind farm infrastructure.
- Whooper Swan Management Area works.
- Habitat Enhancement Areas works.
- Landscaping, fencing and all associated works.

The applicant is seeking a 10 year permission and an operational period of no less than 35 years from the date of commissioning of the entire wind farm.



3.0 OBSERVATION

The original application documentation states:

The cultural heritage EIAR chapter states that there are ‘thirty-four National Monuments situated within 10km of the proposed Ballinlee Wind Farm (Figure 14-1, Table 14-4). The assessment of these National Monuments was undertaken within a 10km study zone to establish potential cultural visual impacts (CVI’s).’

‘Analysis of the ZTV and LVIA data show that the National Monuments within the study area may be affected to differing levels by the locations of the proposed 17 turbines in Ballinlee WF.’

The OPW has reviewed the application documentation and the *Response to Observations* (February 2026) and has the following observations:

Lough Gur NMs 247 – multiple individual sites (< 5 km)

The applicants state that ‘a walkover site inspection was undertaken of the Lough Gur complex of sites that revealed that several sites are not open to the public or are well hidden by blockers such as, topography, trees and buildings. Taking into consideration all the factors above, the cultural visual effect by the proposed wind farm on the Lough Gur complex is classified as ‘slight’.’

The OPW does not consider that this is an adequate and verifiable basis for the selection or omission of viewpoints from the Lough Gur complex.

The OPW does not agree with the statement in the *Response* document that: ‘views from Lough Gur are comprehensively assessed.....VP 17, Grange Stone Circle....VP 18 Lough Gur Wedge Tomb....VP 19 local road northern end of Lough Gur’ (p.49).

The OPW notes the concerns of the DAU of the DHLGH. The OPW questions why the applicants have chosen a route for the underground cable that passes through the Lough Gur zone, with its very high possibility of archaeological finds and disruption.

Lough Gur is identified in the *Limerick County Development Plan 2022-2028* for protection of Views and Prospects (see Fig 1 below).

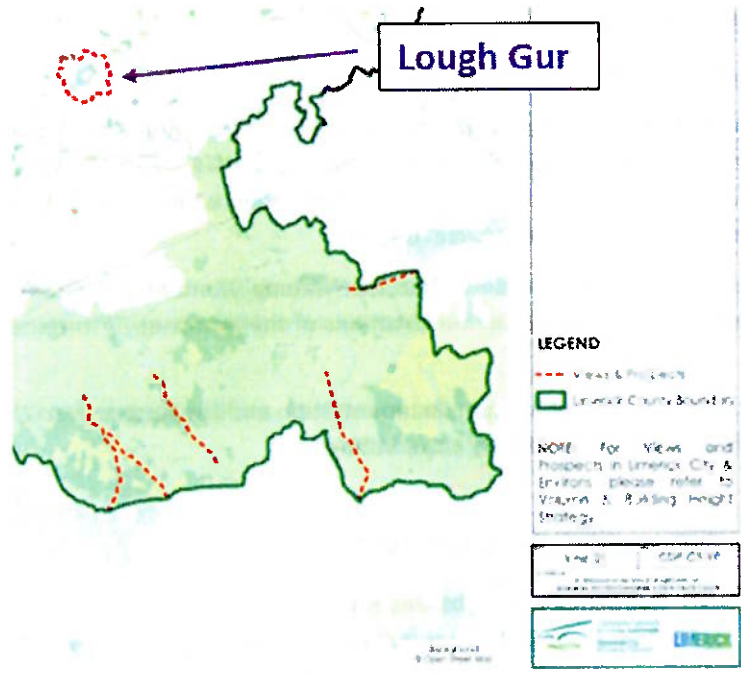


Fig. 1 Extract from the Limerick County Development Plan 2022-2028 mapping Views and Prospects



Fig. 2 Photomontage (VP21) produced in relation to the proposed ACP case reference: PAX91.323635 Garrane Windfarm Co.Limerick



The OPW is including here an extract from photomontage (VP21) which formed part of the planning documentation for ACP case reference: PAX91.323635 Garrane Windfarm Co.Limerick, Garrane Windfarm (ACP undecided) is located 17km to the southwest of Lough Gur. The proposed Ballinlee windfarm will be located in the foreground around 5km or less from Lough Gur (see Fig. 3 below).

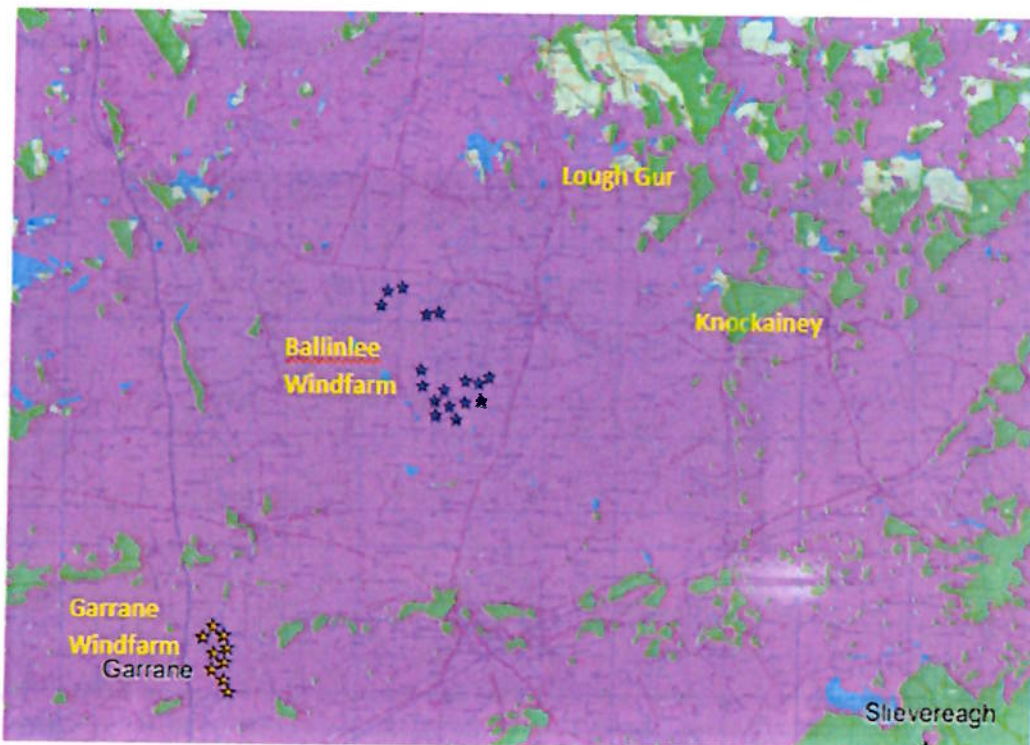


Fig. 3 Extract from ZTV mapping for cumulative impact, with Lough Gur and Knockainey highlighted by the OPW

The OPW is very concerned about the visual and cultural impact of the proposed Ballinlee Windfarm from this view and the cumulative impact with Garrane windfarm. The OPW urges ACP to require the application to produce a photomontage from this location, for Ballinlee WF alone and as a cumulative impact assessment.

A cultural landscape of at least National importance - Lough Gur – Knockainey Hill (5.2km) – Emly (14 km)

The OPW notes the recently published research of Dr Patrick Gleeson in relation to landscape of kingship, which includes detailed examination of the Rock of Cashel landscape and the Eoghanacht dynasty, ref.: *Landscapes of Kingship in Early Medieval Ireland AD 400-1150*, Patrick Gleeson, Four Courts Press (2025).

Gleeson on p.73 refers to the:



'Éóganacht Áine whose territory centered on Knockainey, Lough Gur and Emlý (the primary ecclesiastical site in Munster prior to the elevation of Cashel)'.

Gleeson has identified Knockainey as one of the most archaeologically rich cultural landscape locations in Ireland and suggested that it may be one of the two 'regia' sites recorded in Ptolemy's 1st century AD Cosmographia (older sources) of Ireland.

The OPW suggests that ACP refer the applicant to Dr. Gleeson's book for further information about this landscape.

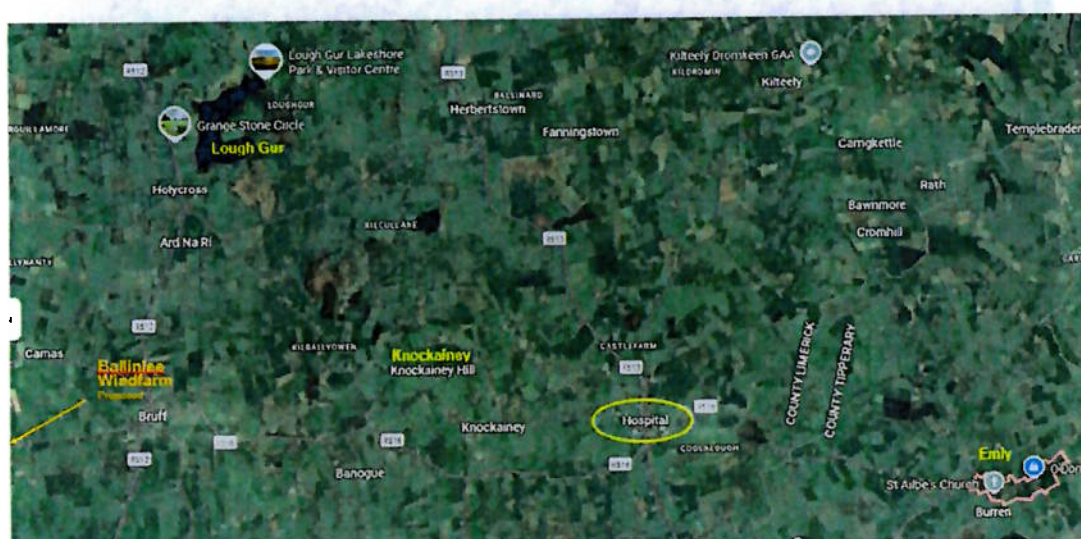


Fig. 4 Aerial photograph showing relative locations of the proposed windfarm and high significance heritage locations: Lough Gur, Knockainey and Emlý

The connections include the pre-Christian sun goddess Áine preserved in the placename of Knockainey and integrated into the intangible cultural heritage of the Lough Gur cultural landscape. Due to the historical connections and the landscape/setting value of Knockainey Hill in relation to Lough Gur, the OPW requests that ACP require that a visual and/or cultural impact assessment is undertaken from appropriate vantage points on Knockainey Hill, underpinned by verifiable photomontage and visual impact analysis, including cumulative impact.

The applicants should provide a description of this cultural landscape and an assessment of the potential impact and cumulative impact of Ballinlee and Garrane windfarms, including their transmission infrastructure.



Kilmallock NMs No.s 212, 408, 173, 680 (5.4 km)

The OPW requests that ACP seek a visual impact assessment for the four National Monuments located in Kilmallock. The visual and cultural impacts are inadequately assessed at present.

The OPW does not consider the following statement to be adequate, nor is it verifiable due to inadequate visual communication:

'A site visit / inspection of the National Monuments within Kilmallock revealed that the proposed turbines may be visible, especially from the Kilmallock Abbey site (Plate 14-39) but not noticeable from the interior of any of the monuments there.'

The OPW requests that ACP seek verifiable visual impact assessment as additional information (e.g. wireframe/ photomontage) to demonstrate the visual impact, if any, on these statutorily protected heritage properties. Any impact assessment should include cumulative impacts.

Monasternenagh Cistercian Abbey NM No. 171 (5.35km)

The OPW requests that ACP seek a verifiable visual impact assessment as additional information (e.g. wireframe/ photomontage) to demonstrate the visual impact, if any, on this statutorily protected heritage property. Any impact assessment should include cumulative impacts.

Disert Oenghusa NM No. 83 (10.1km)

The OPW has in recent years undertaken conservation works to preserve this important early Christian pilgrimage site. In addition, the OPW has invested in external stairs to provide access to the first floor entrance door.

The OPW requests that ACP seek a verifiable visual impact assessment as additional information (e.g. wireframe/ photomontage) to demonstrate the visual impact, if any, on this statutorily protected heritage property. Any impact assessment should include cumulative impacts.

The OPW requests photomontages and LVIA and cultural impact assessment from New Church and Knockadoon.

Screening by trees

The OPW notes that the impact assessment relies in many places, e.g. de Valera Cottage, Lough Gur, on screening by vegetation.

The OPW notes that deciduous trees provide screening for half of the year, and Ash dieback may result in the loss of many trees in the next 5 years – with storm damage posing a further



risk. In addition, if the trees are outside the ownership and control of the applicant, the maintenance of the screening effect is outside of their control.

4.0 CONCLUSION

The number of recorded monuments and National Monuments identified by the applicants demonstrates the cultural significance and sensitivity of the subject landscape.

The aforementioned DHLGH (DAU) letter also emphasises the strong likelihood of further archaeological and cultural finds if construction proceeds.

The OPW requests that ACP seek verifiable visual impact assessment information, including cumulative impact – as additional information – on National Monument heritage receptors as noted above and in the cultural landscape that includes Lough Gur and Knockainey.

The OPW reiterates its concern about the potential direct and visual impact of the proposed wind turbines on views from the internationally significant Lough Gur.¹

The OPW requests that An Coimisiún Pleanála take into consideration the concerns raised in this letter.

Yours sincerely,

Anthony Read

Principal Officer
Heritage Services

¹ <https://heritageireland.ie/places-to-visit/lough-gur-visitor-centre-lakeshore-park/>