

**DIRECTOR GENERAL'S REPORT IN ACCORDANCE WITH THE
REQUIREMENTS OF SECTION 37E (4) OF THE PLANNING AND
DEVELOPMENT ACT 2000 (AS AMENDED) IN RELATION TO
KNOCKSHANVO WINDFARM**

ABP REFERENCE: PA03.320705

1. Introduction

This report has been prepared in accordance with the requirements of Section 37E (4) and 37E (5) of the Planning and Development Act, 2000, as amended, following on from the submission of a Strategic Infrastructure Development (SID) to An Bord Pleanála, known as the Knockshanvo Windfarm.

The Wind Farm is located within the functional area of Clare County Council. The development consists of 9 no. wind turbines with an energy generating capacity of between 51MW to 64MW with a 35-year operational lifespan. The only component of the proposed development within the Limerick City & County Council functional area is a **proposed temporary transition compound**. The purpose of the compound is to transfer blade turbines, arriving into Shannon Foynes Port, from a large vehicle to a shorter vehicle for ease of onward delivery. This Director General report focuses on the temporary transition compound proposed to be located at Court, Kildimo, Co. Limerick.

The Chief Executive Report as prepared by the Clare County Council is circulated to the Elected Members for reference purposes.

The report is to set out the views of the authority on the effects of the proposed development on the environment and/or the proper planning and sustainable development of the area of the authority having regard to the considerations as set out in section 34(2) of the 2000 Act, as amended.

The Elected Members may provide their views on the proposed development. These view will then form part of the response to An Bord Pleanála.

2. Description of the Site

The proposed wind farm is located c. 20km north of Kildimo in Co. Clare. The wind farm application site includes a parcel of land located in the townland of Court in Kildimo, Co. Limerick whereby a temporary transition compound is proposed. The subject site is on the northern side of the N69. The subject site is c. 1.5km east of Kildimo along the N69 and c. 4km west of Clarina. The site is c. 21km west of Foynes. The stated site area is c. 1.10ha. The site traverses 200m along the N69 is 60m in depth. The site comprises agricultural land. There is an existing access to a farm/dwelling adjacent to the subject side. The surrounding area comprises farming land; residential uses and some commercial activities directly opposite, on the other side of the N69.

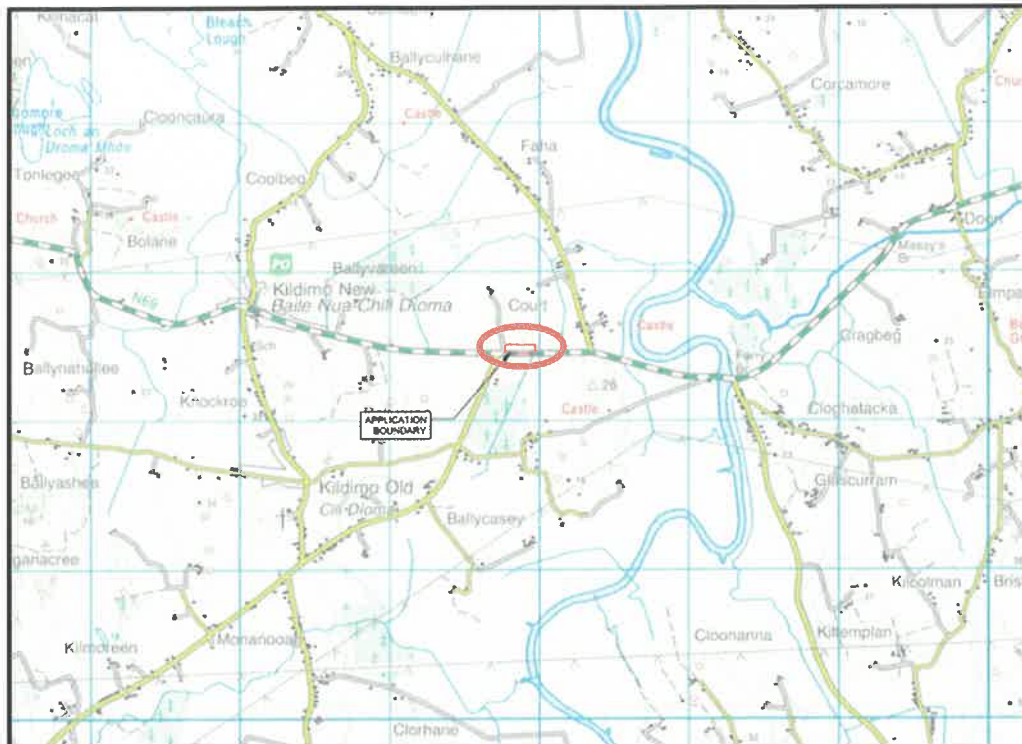


Figure 1: Site location (Court, Kildimo, Co. Limerick), outlined in 'red'



Figure 2: Distance from proposed Wind Farm Site to Temporary Transition Compound in Court, Kildimo



Figure 3: Site Photograph



Figure 4: View west along the N69 National Road

3. The Proposed Development

The proposed development provides for the following at Court, Kildimo, Co. Limerick:

- Installation of a temporary transition compound to facilitate turbine blade delivery during the construction phase. The works will include installation of a temporary stone hard standing area and associated entrance and egress to and from the N69 national road and will be removed at the end of the construction phase.

The Temporary Transition Compound will not be required for the entire duration of the construction phase which will take 18-24 months. It is estimated that the Temporary Transition Compound will be required for a total of 8 months.

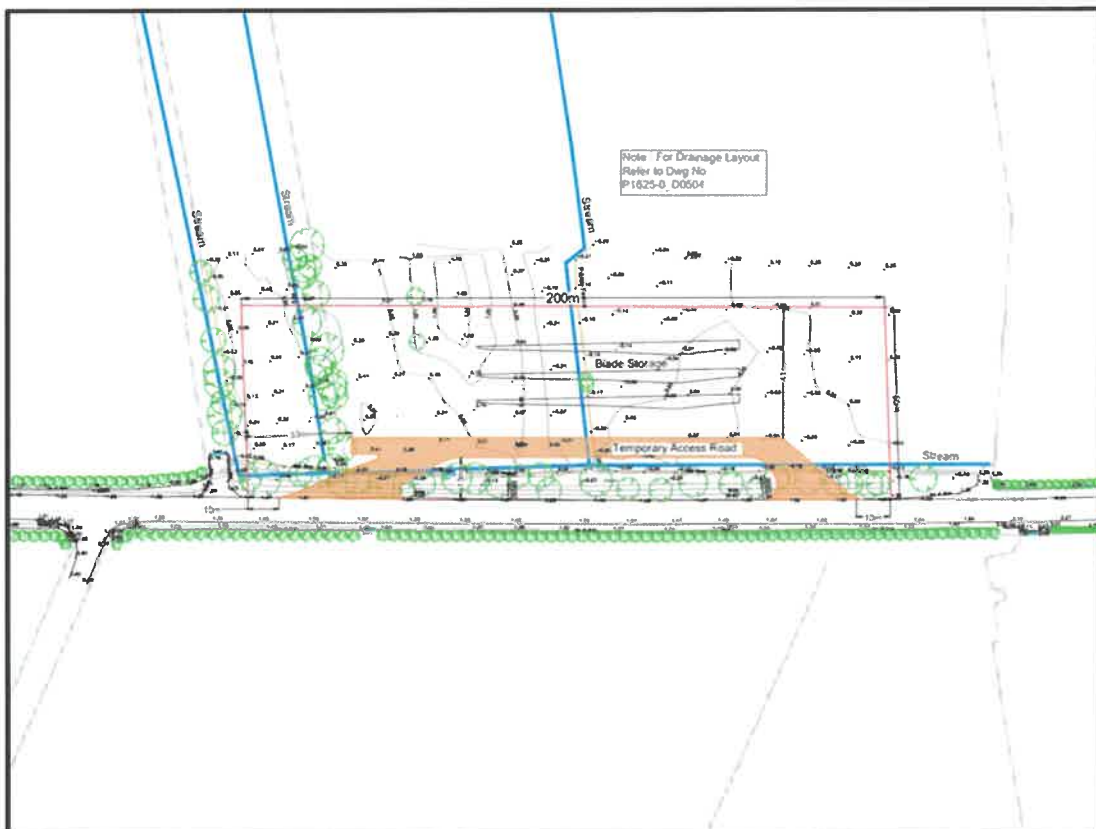


Figure 5: Site Layout Plan, Temporary Transition Compound, Court, Kildimo

At this location, it is proposed that the blades are unloaded and attached to vehicles with the capability to lift the tip of the blades to an angle of 60° in order to significantly shorten the length of the vehicle in the horizontal plane which will facilitate a more streamlined delivery of turbine components to the wind farm site. The temporary transition compound will be in place solely for the duration of turbine blade delivery to the wind farm site and will take place at night under Garda escort. Following the completion of construction, the temporary transition compound will be closed by means of fencing, and the land and boundary treatments will be restored.

For context, the proposed overall wind farm development provides for the following (in Co. Clare):

- Construction of 9 no. wind turbines, construction of 1 no. permanent 110 kV electrical substation, access roads and all associated works. The application is seeking a ten-year planning permission.

4. Planning History

There is no recorded planning history on the site at Court, Kildimo, Co. Limerick.

5. Pre-Application Discussions

Pre-application discussions between the applicant, their consultants and Limerick City & County Council (LC&CC) took place on 9th April 2024. At that time, the Planning Department of LC&CC noted that the proposed temporary transition compound includes a new access onto a national road in a 100kph zone and is therefore in conflict with the Spatial Planning and National Roads Guidelines for Planning Authorities and also in conflict with the Limerick Development Plan 2022 – 2028 with particular reference to Objective TR O39 National Roads.

It was noted that Mid West National Road Design Office is not in favour of the development as proposed given it conflicts with the Spatial Planning and National Roads Guidelines for Planning Authorities and the Limerick Development Plan. It was also noted that it is the Planning Authority's opinion that the Transport Infrastructure Ireland would not look favourably on the proposed development.

6. Planning Policy Context

6.1 National Planning Framework (Project Ireland 2040)

National Policy Objective 54

Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.

National Policy Objective 55

Promote renewable energy use and generation at appropriate locations within the built and natural heritage environment to meet national objectives towards achieving a low carbon economy by 2050

6.2 The Regional Spatial and Economic Strategy for the Southern Region

Objective RPO 99 Renewable Wind Energy

It is an objective to support the sustainable development of renewable wind energy (on shore and off shore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.

6.3 Limerick Development Plan 2022 – 2028

Policy CAF P1 Climate Action

It is a policy of the Council to implement international and national objectives, to support Limerick's transition to a low carbon economy and support the climate action policies included in the Plan.

Policy CAF P6 Renewable Energy

It is a policy of the Council to support renewable energy commitments outlined in national and regional policy, by facilitating the development and exploitation of a range of renewable energy sources at suitable locations throughout Limerick, where such development does not have a negative impact on the surrounding environment landscape, biodiversity, water quality or local amenities, to ensure the long-term sustainable growth of Limerick.

Objective CAF O27 Renewable Energy Production

It is an objective of the Council to encourage and facilitate the production of energy from renewable sources, such as from bioenergy, solar, hydro, tidal, geothermal and wind energy, subject to appropriate levels of environmental assessment and planning considerations.

Objective CAF O28 Assessment of Renewable Energy Projects

It is an objective of the Council to encourage the development of wind energy, in accordance with Government policy and having regard to the principles and planning guidance set out in the Department of Housing, Planning and Local Government publications relating to Wind Energy Development and the DCCAE Code of Practice for Wind Energy Development in Ireland and any other relevant guidance, which may be issued in relation to sustainable energy provisions during the course of the Plan.

CAF O29 Wind Energy Development and Environmental Considerations

It is an objective of the Council to facilitate the development of wind energy in an environmentally sustainable manner, ensuring proposals are consistent with the landscape character objectives of the Plan, the protection of the natural and built environment and the visual and residential amenities of the area.

CAF O30 Location of Wind Energy Developments

It is an objective of the Council to promote the location of wind farms and wind energy infrastructure in the 'preferred areas' as outlined on Map 9.1, to prohibit such infrastructure in areas identified as 'not open for consideration' and to consider, subject to appropriate assessment, the location of wind generating infrastructure in areas 'open for consideration'.

Objective CAF O31 Wind Energy supporting Infrastructure

It is an objective of the Council to support the development of appropriate land based infrastructure and facilities at suitable locations, in order to facilitate the necessary connections for off- shore renewable energy projects.

Objective TR O39 National Roads

It is an objective of Council to:

- a) Prevent, except in exceptional circumstances and subject to a plan-led evidence-based approach, in consultation with Transport Infrastructure Ireland, in accordance

with the Section 28 Ministerial Guidelines Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012), development on lands adjacent to the existing national road network, which would adversely affect the safety, current and future capacity and function of national roads and having regard to reservation corridors, to cater for possible future upgrades of the national roads and junctions;

b) Avoid the creation of any new direct access points from development, or the generation of increased traffic from existing direct access/egress points to the national road network, to which speed limits greater than 60km/h apply;

c) Facilitate a limited level of new accesses, or the intensified use of existing accesses, to the national road network on the approaches to, or exit from, urban centres that are subject to a speed limit of between 50km/h and 60km/h. Such accesses will be considered where they facilitate orderly urban development and would not result in a proliferation of such entrances;

Policy EH P1 Protection of Natural Heritage and Biodiversity

It is a policy of the Council to:

a) Protect and conserve Limerick's natural heritage and biodiversity, in particular, areas designated as part of the European Sites Natura 2000 network, such as Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), in accordance with relevant EU Directives and national legislation and guidelines.

b) Maintain the conservation value of all Natural Heritage Areas and proposed Natural Heritage Areas (pNHAs) for the benefit of existing and future generations

Policy EH P8 Landscape Character Areas

It is a policy of the Council to promote the distinctiveness and where necessary safeguard the sensitivity of Limerick's landscape types, through the landscape characterisation process in accordance with the Draft Guidelines for Landscape and Landscape Assessment (2000) as issued by the Department of Environment and Local Government, in accordance with the European Landscape Convention (Florence Convention) and with A National Landscape Strategy for Ireland – 2015- 2025. The Council shall implement any relevant recommendations contained in the Department of Arts, Heritage and the Gaeltacht's National Landscape Strategy for Ireland, 2015 – 2025.

LCA 06 Shannon Coastal Zone

This zone comprises a large area of northern Limerick and is bounded on one side by the Shannon Estuary, while its southern boundary is defined by the gradually rising ground, which leads onto the agricultural zone and the western hills to the south west. The presence of the estuary is the defining characteristic of the region. The landscape itself is generally that of an enclosed agricultural type, essentially that of a hedgerow dominant landscape. This differs from the other agricultural landscapes of the County, in that the field patterns, particularly close to the estuary, tend to be less regular than those elsewhere in Limerick.

a) Where housing is permitted, encourage appropriate scale and high-quality design for this landscape area, combined with sensitive site location and landscaping. Respect traditional scale, particularly on elevated or locally prominent sites.

b) To protect the views and prospects along the N69 (see Map 6.2), as a priority for the Planning Authority. Only in exceptional circumstances (e.g. domestic extensions and/or a suitably screened dwelling for an individual who is engaged in full time farming or other exceptional circumstances) will development be allowed between the road and the estuary.

- c) To encourage the use of site-specific designs with careful attention to landscaping. Finishes such as plaster finish, which will assist in integrating the development into the landscape, are encouraged.
- d) All of the above (a to c) does not apply within the settlements of the Shannon Coastal zone.
- e) To permit holiday homes only within existing settlements.
- f) To rigidly adhere to best practice in the installation and use of wastewater treatment systems, given the proximity of the Shannon and the importance of water-based habitats in the area, to ensure that no deterioration in water quality takes place.
- g) Where wind farms are permitted, it is recommended that single lines of equally spaced turbines shall be considered, in order to limit the visual and landscape impact.
- h) Development shall be encouraged within existing settlements.
- i) Development identified under the SIFP will adhere to the mitigation measures for landscape management as appropriate.

7. Appropriate Assessment & Environment Impact Assessment

The proposed development is strategic in nature and the application has been made directly to An Bord Pleanála. Therefore, An Bord Pleanála is the Competent Authority in respect to appropriate assessment of the project. A Natura Impact Statement has been submitted in relation to the project and accompanies the application.

An EIAR has been submitted with the application. An Bord Pleanála are the competent authority with regard to Environmental Impact Assessment and should therefore satisfy themselves regarding the adequacy of documentation submitted.

The above noted documents have been reviewed and the key issues are considered in the Section below.

8. Views of the authority on the effects of the proposed development on the environment and the proper planning and sustainable development of the area of the authority

Proposed Development

A temporary transition compound is proposed adjacent to the N69, in the townland of Court, Co. Limerick, to facilitate turbine blade delivery for a proposed wind farm in Co. Clare. The compound measures approximately 200m along the N69 and 60m in width. It will be in place for the duration of the blade delivery to the wind farm site only and thereafter, the lands will be restored.

Turbine components are generally transported at night when traffic is lightest and this is done in consultation with the roads authorities and An Garda Síochána.

Principle of Development

The site is not zoned under the Limerick Development Plan 2022-2028. There is no policy within the Development Plan that details specifically with temporary transition compounds. Policy TR 039 is applicable, however, relates to new direct access point from a development, rather than the proposed temporary access.

Policy TR 039 seeks to prevent, except for exceptional circumstances, development on lands adjacent to the existing national road network, which would adversely affect the

safety, current and future capacity and function of national roads. As set out below, the Roads Department do not consider the location suitable in the interest of safety. It is considered that the section of the N69 in question has a straight road alignment which would allow vehicles to approach the proposed entrance and egress at speed. It is noted that the vehicles in question, entering the site would be slow moving in contrast to the approaching vehicles. The proposed development is therefore not acceptable with regard to Policy TR O39.

As stated, the application site is located in the open countryside. In terms of wind farm development, the site is identified as being within an 'Areas unsuitable' for wind energy development under the Limerick Development Plan 2022 – 2028. As per Objective CAF O30, the Council seek to promote the location of wind farms and wind energy infrastructure in the 'Preferred Areas' as outlined on Map 9.1.

As with Policy TR O39, there is no specific renewable energy policy within the Development Plan which directly deals with temporary transition compounds or similar. However, based on the above, the proposed development is not supported in principle.

Internal Reports

- Roads Department (report dated 11/10/2024) are not in favour of the proposed development and are recommending refusal. They advise that the location is deemed not suitable in the interest of safety due to the speed of approaching vehicles on this stretch of road alignment. In addition, there is a private entrance adjacent to the proposed site and it is noted that the proposed vehicles entering the site would be slow moving in contrast with the approaching vehicles. It is stated that the proposed development contains a new/intensified access onto national road in a 100kph zone and so is in conflict with the Spatial Planning and National Roads Guidelines for Planning Authorities. It is also in conflict with the Limerick Development Plan 2022 – 2028.
- The Council Ecologist (report dated 30/09/2024) advises that the Environmental Impact Assessment Report (EIAR) is lacking in detail in relation to the site at Court, Kildimo and that there are omissions regarding the same as the EIAR focuses on the proposals in Co. Clare. The findings of the Natural Impact Assessment (NIS) are accepted by the Ecologist.
- The Mid West National Road Design Office (report dated 13/09/2024) states that the proposed development contains a new/intensified access onto national road in a 100kph zone and so is in conflict with the Spatial Planning and National Roads Guidelines for Planning Authorities. It is also in conflict with the Limerick Development Plan 2022 – 2028. Accordingly, they state that they would not be in favour of the development as proposed.

See Appendix 1 for Internal Reports.

Traffic & Transport

The turbine delivery routes include the delivery of turbine components from Shannon Foynes Port in Co. Limerick to the wind farm site. The route involves the following:

- National Road network (N69),
- Regional Road network (R510, R526, R463, and R465); and
- Local road network (Father Russell Road).

The longest components are the turbine blades which are usually the most onerous for delivery.

For the first part of the delivery route between Foynes Port to the temporary transition compound, it is proposed that the turbine blades will be delivered using the standard method of delivery, where the blade is horizontal on a Super Wing Carrier. The Super Wing Carrier is the critical vehicle in terms of turning requirements, as it is significantly longer than the tower transport vehicle. In order to minimise the impact on the built environment a blade adaptor trailer is required to deliver the turbine components from the temporary transition compound outside Kildimo to the wind farm site (via Limerick City).

The applicant states that it is necessary to locate the temporary transition compound to the west of Limerick City in order to minimise impact on the built environment of Limerick City; to manoeuvre the 90° junctions in Limerick City and to pass through the city safely and quickly.

a) Construction of the compound:

Initially the traffic will relate to construction traffic associated with the temporary transition compound. During the construction of the temporary transition compound it is proposed that there will be approximately 27 truck movements accessing and exiting the site per day (approximately 3 in and 3 out per hour) for 85 days. These movements will be managed on site by means of temporary traffic management measures, including signs and flagmen.

b) Delivery of the blades (wind farm construction period):

The next stage will be in relation to the delivery of the blades, whereby the EIAR states: it is assumed that the turbine delivery element will progress at the rate of 5 extended artic trips made by convoy to the site on 2 days per week, resulting in this stage taking approximately 15 days/nights spread over a 3 week period. It is noted that during the construction period access to the temporary transition will be closed at all times outside the hours of construction or night time operation.

c) Delivery route summary:

- From the access road serving Foynes Port the route turns left (south) onto the N69 National Secondary Road at the existing priority junction

- From this point the route heads east on the N69 for approximately 32kms, passing through various bends on the route
- At a location on the northern side of N69 just to the east of the village of Kildimo, it is proposed that there will be a temporary transition compound constructed, where the turbine blades will be transferred from a standard method of transportation to vehicles with specialised adaptors that lift the blade to 60° in order to minimise the length of the vehicle in plan
- The route then turns right at the N69 / R510 roundabout to head south for approximately 1.1kms, passing through Ard Aulin roundabout to reach the roundabout of the R510 and Father Russell Road
- From here the route turns left heading northeast on Father Russell Road for approximately 1.3kms passing through the Oakfield Roundabout to reach the roundabout that connects with the R526
- The route continues northeast on the R526 for approximately 1.5 kms passing through the roundabout with Dooradoyle Road to the traffic signals at Ballinacurra Road
- From this point the route travels northeast through Limerick City Centre for approximately 2.9 kms via O'Connell Avenue, O'Connell Street (contra-flow), Bridge Street and Athlunkard Street to the roundabout of R463 Corbally Road / Pa Healy Road
- The route then heads north on the R463 for approximately 4.3 kms crossing the River Shannon, which forms the County Limerick and County Clare border, onto the river crossing at Ardnacrusha
- From here the route continues on the R465 for approximately 7.2 kms, passing through various bends on the route to the location of the proposed wind farm access junction on the R465

The total length of the Turbine Delivery Route from Foynes Port to the access junction off the R465 is approximately 50 kms.

The turbine delivery route map is provided at Appendix 2.

The EIAR advises that due to the nature of the blade delivery vehicles/carriers, a long straight stretch of road is a prerequisite for visibility and safety and enables the vehicle carriers to exit and re-enter the road with minimal turning movements. The study area for the transition compound was thus limited to focus on a 2.5km straight stretch along the N69 National Secondary Road. Engagement with local landowners in this study area with sufficient land size requirements (i.e. 200m x 60m) yielded two viable sites for further consideration, Option A and Option B.

Given Option A is on the left hand side of the N69 as the carriers travel north towards Limerick City, they can enter and exit the temporary transition compound without the need to cross the N69, or make a right hand turn which would block the road. In addition, Option A was the only viable option due to landowner consents. (Option B was located on the right hand side of the N69 as the carriers travel north towards Limerick City)

In terms of mitigation, the EIAR sets out that a Traffic Management Plan will be submitted to Limerick City and County Council. This will set out when the exact transport arrangements are known, delivery dates confirmed and escort proposals in place. The finalised Transport Management Plan will be submitted to the Planning Authority for agreement in advance of any abnormal loads using the local roads, and will provide for all necessary safety measures, including a convoy and Garda escort as required, off-peak turning/reversing movements and any necessary safety controls.

Natural Heritage

The application site is c. 650m west of the River Shannon and River Fergus Estuaries SPA (004077) and the Lower River Shannon SAC (002165).

Drainage

Three no. streams traverse the compound and three no. culverts are proposed within the compound area. Two no. aco drains are also proposed at the entrance to the compound.

Flooding

The site is within Flood Zone A and B as set out in the CFRAM maps. The application site is also located within lands identified as OPW Benefitting Lands. Given that the compound is temporary and will be present for only c. 8 months, the potential for effects are significantly reduced in comparison to a permanent structure being built in the floodplain.

Visual Amenity

The works will include installation of a temporary stone hard standing area and associated entrance and egress to and from the N69 national road and will be removed at the end of the construction phase. A double silt fence is proposed to the rear and sides of the compound area. Details for boundary treatment, gates or otherwise to the front boundary are not set out. There would be some visual impact along the N69 to allow for the entrance and egress given the scale of the vehicles proposed. Notwithstanding the lack of detail in this regard, any visual effects would be temporary in nature.

The EIAR provides photomontages and once such is the view from Thomand Bridge in Limerick City (View Point 6), approximately 11.2km south of the nearest turbine. From this view, the residual significant of the visual effect is 'slight' with the only the blades of 2 no. turbines fully visible.

Other

No National Monuments, Recorded Monuments, Protected Structures or NIAH structures are located within the footprint of the proposed temporary transition compound and the application site is not in an Architectural Conservation Area. There are no archaeological features identified within or adjacent to the application site.

9. Clare County Council

Clare County Council prepared a Chief Executive's report in accordance with the requirements of section 37E (4) of the planning and development act 2000 (as amended). This report states that while the existing Wind Energy Strategy broadly supports the proposals that the Planning Authority has reservations in relation to the orderly development of the wider lands designated as 'Strategic' for wind farm development. It considered there is piece meal development of the lands. In addition, there are concerns regarding the height and scale of the development. Furthermore, there are significant traffic safety concerns in including impacts on the wider roads network noting the separate haulage routes proposed. There are also concerns regarding protection of residential amenity, soils/hydrology, natural heritage, impacts on a recreational route and potential impacts on aviation safety.

This report was considered by the Elected Members at a meeting on the 14th October. 2024.


10. Conclusion

Notwithstanding the temporary nature of the proposed development, a new access and egress from the N69 is required. This is in conflict with Objective TR O39 National Roads of the Limerick Development Plan 2022 - 2028, which seeks to avoid the creation of any new direct access points from development to the national road network. Both the Mid West National Road Design Office and the Councils Roads Department are not in favour of the proposed development as it contains a new/intensified access onto national road in a 100kph zone and so is in conflict with the Spatial Planning and National Roads Guidelines for Planning Authorities.

In summary having regard to the location of the site on the N69 there are significant traffic safety concerns in respect to the proposed development. The Council Ecologist has also highlighted that there are deficiencies in the EIAR in relation to data and survey of the proposed temporary transition compound area.

The above report sets out the views of the Planning Authority in accordance with Section 37E (4) of the Planning and Development Act, 2000, as amended. It is respectfully requested that the Board take the above issues into consideration in the assessment of this application.

In the event of a grant of permission it is recommended that appropriate conditions are attached for a windfarm development including construction management and oversight, road network, traffic management plan, survey the drains on the site (Court Kildimo) and report on the presence /absence of opposite leaved pondweed *Groenlandia densa* in particular prior to commencement.



Dr. Pat Daly
Director General,
Limerick City & County Council
23rd October 2024

Appendix 1: Internal Reports



Comhairle Cathrach
& Contae Luimnigh

Limerick City
& County Council

Planning Application Internal Report

Planning Ref: 24320705

Applicant: SID FuturEnergy Knockshanvo Designated Activity Company

Development Address: Court, Kildimo, Co. Limerick

Development Description: the proposed development of 9 no. wind turbines, 110kV substation and ancillary development located in the townlands of Snatty, Hurdlestown, Oatfield, Drumsillagh, Sallybank, Gortacullin, Aharinaghbeg, Knockshanvo, Cloontra, Cloghoolia, Ballycullen and others, County Clare.

Report Prepared By: Tony Carmody

Date: 11.10.2024

Comments:


1. Roads

- (a) The Road Section is not in favour of the proposed temporary transition compound as proposed, as its location is deemed not suitable in the interest of safety. This section of the National Secondary Road N69 has a straight road alignment, which allows vehicles on both approaches to the proposed entrance to approach at speed. There is also overtaking possible at this location. The proposed entrance is close proximity to an existing junction and private entrance. The type of vehicles entering and exiting the proposed entrance would be slow moving in contrast to the speed of approaching vehicles.
- (b) The proposed development contains a new/intensified access onto national road in a 100kph zone and so is in conflict with the Spatial Planning and National Roads Guidelines for Planning Authorities. It is also in conflict with the Limerick Development Plan 2022 – 2028.

Recommendation:

Refusal

Signed


Tony Carmody

Date: 03.10.2024

SID Planning Internal Report

Planning Ref: 24/320705

Applicant: SID FuturEnergy Knockshanvo Designated Activity Company

Development Description: The proposed development consists of 9 no. wind turbines, 110kV substation and ancillary development located in the townlands of Snatty, Hurdlestown, Oatfield, Drumsillagh, Sallybank, Gortacullin, Aharinaghbeg, Knockshanvo, Cloontra, Cloghoolia, Ballycullen and others, County Clare. And located in the townland and at Court, Kildimo, Co. Limerick.

Report Prepared By: Seán Doyle, MSc., BSc. Hons - Ecologist.

Comments:

An EIAR, a number of pertinent maps and an NIS were submitted as part of this application.

For the purpose of this report I will deal with each document separately.

This NIS has a number of mitigation methods in place to deal with negative impacts of stored soil and the construction phase of the windfarm as a whole. So long as these measures are applied to the proposed transitional compound in Kildimo, the potential for siltation or run off issues is reduced. I am happy to accept the findings of the NIS.

The EIAR mainly focuses on the part of the proposed development that is located in Co. Clare. There are information gaps regarding the transitional compound proposed for Kildimo. A Desktop surveys was reportedly carried out on the site. There is a habitat map provided. However, the EIA expressly states that NDBC records were checked for species records within hectads R56 and R57 in Co. Clare. There is no mention of any search in hectad R45, the relevant hectad for Limerick and the transition compound proposed for Court, Kildimo. Also, within the EIA report there are records of floral protection order plant species and other rare and protected plant species (obtained through data request through NPWS) from the hectads where the main body of the windfarm and the grid connection are located in Co. Clare (R56 and R57). These are then dealt with by the report. There is no mention of the hectad containing the transitional compound despite multiple FPO species being present in the records for the hectad and the 1km grid square adjacent to the proposed compound. It would be important to consider these records and then to survey the drains on the site and report

on the presence /absence of opposite leaved pondweed *Groenlandia densa* in particular before any hard standing or in-stream culverts be installed.

Recommendations:

The EIAr provided is lacking in detail, particularly on the issues outlined above. Clearly presented findings on whether or not species/habitats relevant to the NIS and EIA are essential to being able to assess the application. I would recommend revising the EIA document to clearly outline these omissions before proceeding.

Signed: Seán Doyle MSc., BSc. Hons. - Ecologist **Date:** 30/09/2024



Our Ref: 0000/04/00952

13th September 2024

Nuala O'Connell,
Limerick City & County Council
Planning & Environmental Services
Civic Offices
Dooradoyle
Limerick.

Re. Planning Ref. No. 24/320705

Applicant: SID FuturEnergy Knockshanvo

Nuala,

I refer to the above application.

The Mid West National Road Design Office has the following observations to make in relation to the above Planning Application:

The Mid West National Road Design Office having reviewed LCCC Pre-Planning Application, (REF: 553819), had the following observations, which were emailed to the Planning Department of LCCC on the 28/03/2024:

- The proposed development contains a new/intensified access onto national road in a 100kph zone and so is in conflict with the Spatial Planning and National Roads Guidelines for Planning Authorities. It is also in conflict with the Limerick Development Plan 2022 – 2028. Accordingly we would not be in favour of the development as proposed.*

Should you wish to receive the views of TII, please contact them separately at landuseplanning@tii.ie.

After reviewing Planning Application 24/320705 the Mid West National Road Design Office would like to note that the **EIAR Chapter 2 Section 2.6.2 Scoping Responses** has a **Table 2.10 Scoping Responses** which states “Limerick County Council – Roads Department No Response received.”

The Mid West National Road Design Office would like to note that they did not receive any correspondence from the Applicant.



Comhairle Cathrach
& Contae Luimnigh
Limerick City
& County Council



Comhairle Contae Thiobraid Árann
Tipperary County Council



Telephone: 061 - 951000

e-mail: info@midwestroads.ie

The Mid West National Road Design Office has the following observations to make in relation to the above planning application:

- The proposed development contains a new/intensified access onto national road in a 100kph zone and so is in conflict with the Spatial Planning and National Roads Guidelines for Planning Authorities. It is also in conflict with the Limerick Development Plan 2022 – 2028. Accordingly we would not be in favour of the development as proposed.
- Should you wish to receive the views of TII, please contact them separately at landuseplanning@tii.ie.

Regards,



Dermot Boland

Executive Engineer

Appendix 2: Turbine Delivery Route Map

