Duas Serras and the ZAER regime

Document and map verification | 27 November 2026

No turbine in either published layout overlaps the wind zones in the adopted national territorial model.

The GeoPackage published by APA for PDA287 was compared with the official PSZAER geographic data published by DGT. Both alternatives and all 24 project layers were checked, including roads, cables, power lines and substation features. [5, 6]

Published scenario	Turbines in wind ZAER	Nearest turbine to wind ZAER
1: 9 turbines	0 of 9	5.13 km
2: 10 turbines	0 of 10	4.20 km

None of the 228 supplied geographic features across the two scenarios intersects the national wind-zone mapping. These are alternatives, not a 19-turbine project. The nearest component of any kind is approximately 4.20 km away. Distances are indicative map measurements.

What this establishes

Eligibility of the published project for ZAER treatment has not been demonstrated. Article 40-A(5) requires the whole project to lie in the zone and meet its eligibility criteria. Municipal integration identifying the applicable technology is also required. Solar designation does not demonstrate wind eligibility. Being outside a ZAER does not itself prevent a project using the ordinary licensing route. [1, 2, 4]

A specific municipal planning step needs clarification

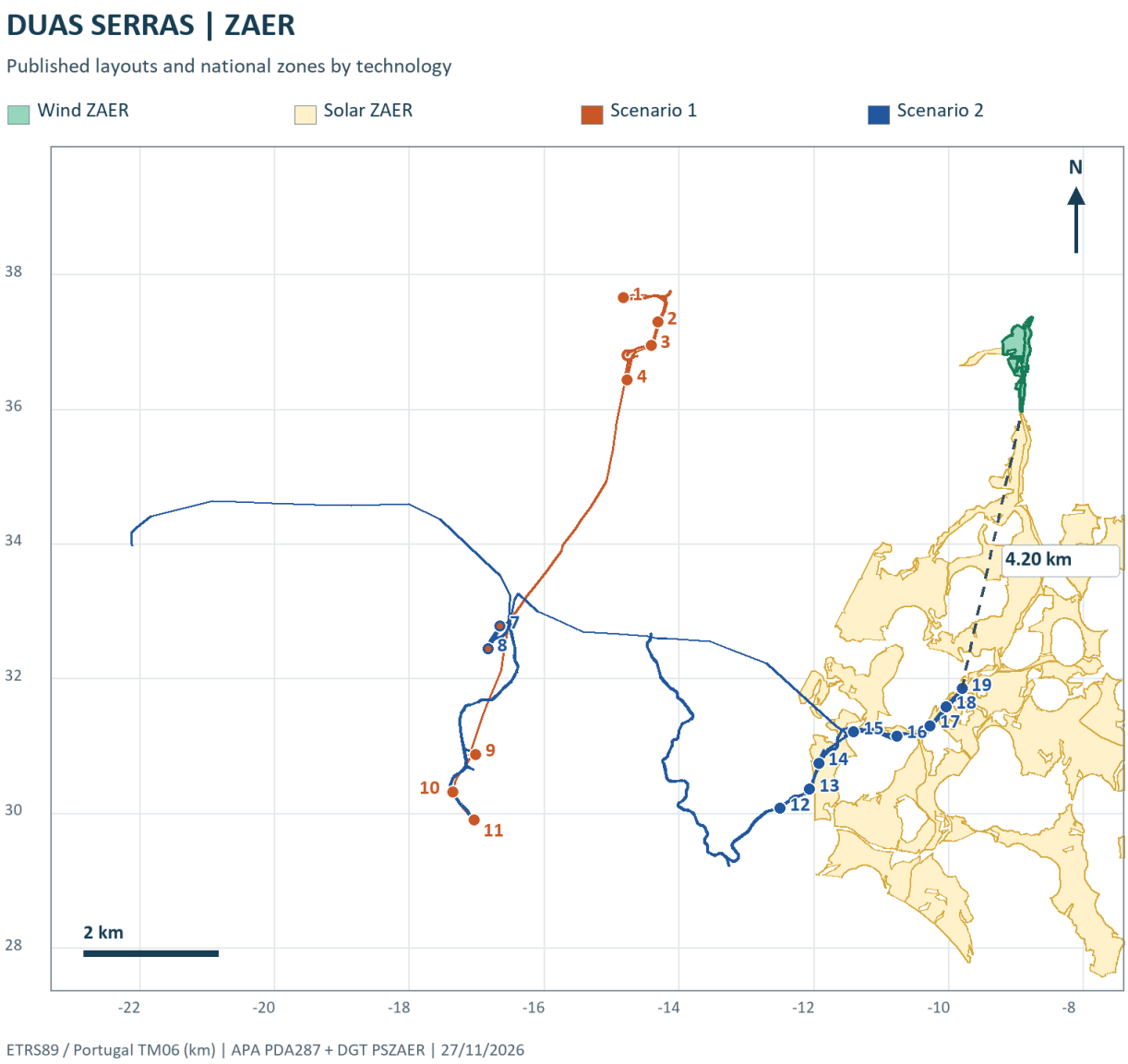
15 July: the municipality formally opposed the proposed national programme, raising water, biodiversity, forestry, wildfire, landscape, tourism, cumulative impacts and PDM compatibility. This concerned the programme proposal and is not a decision on Duas Serras. [7]

National consultation: the reply to municipal submission 120611 recorded those concerns and referred map consolidation and local constraints to the subsequent stage with municipalities. It does not confirm that every concern was individually resolved. [9]

27 November, item 4.5: the council agenda proposes ratifying presidential Order 78/2026 of 23 November, concerning a fourth amendment to the first PDM revision to integrate PSZAER. The complete order, proposed boundaries and voting outcome were not located. An agenda does not establish approval or final publication. [8, 10]

Comparison of the published locations

Green: national wind zones. Yellow: nearby national solar zones. Points and routes: the two project alternatives. Numbers follow the WTG labels in the project GeoPackage. The dashed line is the distance from WTG19 to the nearest wind zone.



Check the technology: scenario 2 turbines WTG14 and WTG18 overlap national solar polygons in Figueiró dos Vinhos and Pedrógão Grande respectively. They do not overlap wind polygons. Solar overlap does not establish eligibility for a wind farm.

Verification map without property or municipal boundaries. It is not a certified survey or an official eligibility decision. National polygons still require municipal refinement and integration for the regime considered here.

WTG / scenario	Distance to wind ZAER	WTG / scenario	Distance to wind ZAER
WTG 1 / 1	5.67 km	WTG 7 / 2	8.36 km
WTG 2 / 1	5.13 km	WTG 8 / 2	8.65 km
WTG 3 / 1	5.22 km	WTG 12 / 2	6.89 km
WTG 4 / 1	5.59 km	WTG 13 / 2	6.43 km
WTG 7 / 1	8.36 km	WTG 14 / 2	6.02 km
WTG 8 / 1	8.65 km	WTG 15 / 2	5.37 km
WTG 9 / 1	9.55 km	WTG 16 / 2	5.15 km
WTG 10 / 1	10.14 km	WTG 17 / 2	4.85 km
WTG 11 / 1	10.13 km	WTG 18 / 2	4.52 km
		WTG 19 / 2	4.20 km

The records and answers to obtain next

1. Council: obtain the complete presidential Order 78/2026, the decision and vote on item 4.5, terms of reference, proposed boundaries by technology, timetable, and reasons for the environmental assessment and public participation arrangements. Identify the legal basis for any proposed boundary extension or technology change.

2. Council and DGEG: establish expressly whether ZAER treatment is claimed for Duas Serras. If so, identify the zone, technology, effective municipal integration instrument and the overlay demonstrating that the whole project, with all relevant components, qualifies.

3. DGEG: identify the prior-control procedure, its start date and how article 9 of DL 130/2026 applies. The 2021 Cabril auction and the 2026 PDA date do not, on their own, settle the relevant procedure date.

4. Council: explain how its own July concerns and the risks documented by residents will be addressed. Identify any proposed exclusions and their technical justification where applicable.

5. DGEG and APA, if ZAER treatment is claimed: identify the environmental compliance review and any exemption decision relied upon. Article 42-A addresses unanticipated impacts and includes a reasoned ministerial exception. No such project-specific decision was found for Duas Serras. [2]

The council has a planning role, subject to conditions

NG1 permits technically justified exclusions for territorial incompatibility. The 1% minimum applies across technologies together. Table 7 identifies 714.00 ha of solar areas and 15.29 ha of wind areas in Figueiró dos Vinhos. The programme does not require approval of Duas Serras. The suitability and availability of alternatives must be demonstrated. The 1 km residential buffer is a national wind-mapping criterion, not a universal statutory setback for every wind farm. [1, 4]

Transition: the new regime took effect on 28 August 2026. Article 9 of DL 130/2026 applies its changes only to procedures begun after commencement. A PDM amendment does not approve this project or, by itself, establish eligibility. [3, 4]

Method and limits

Comparison in ETRS89 / Portugal TM06, EPSG:3763, against 413 national wind polygon records. Turbine positions needed no geometry repair. Standard normalisation was applied to 42 other project geometries and 39 national records. Non-overlap was independently corroborated using the original, unrepaired bounding boxes, separated by at least 3.56 km. Downloads, feature results and SHA-256 hashes were retained. This does not certify municipal legal status or predict a licensing decision.

Primary and official sources checked on 27 November 2026

1. PSZAER: resolution, NG1, NG2 and table 7
2. DL 15/2022: articles 40-A(5), 42, 42-A, 48(3)(c), annex I(10)
3. DL 130/2026: articles 9 and 10, transition and commencement
4. EMER: 10 essential questions about ZAER
5. DGT: official geographic files
6. APA: PDA287 project record and GeoPackage
7. Council: July municipal opinion
8. Council: 27 November 2026 agenda, item 4.5
9. EMER: consultation Annex II, submission 120611
10. Council: published minutes