



APPENDIX 6-1

*BIODIVERSITY MANAGEMENT
AND ENHANCEMENT PLAN*

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1. INTRODUCTION

1.1 Background

MKO have prepared a Biodiversity Enhancement and Management Plan (BEMP) to support the Environmental Impact Assessment Report (EIAR) for the Proposed Carrow Renewable Energy Development in Co. Tipperary (the Proposed Project), which includes 14 no. turbines and all associated infrastructure and works. The full description of the Proposed Project is detailed in Chapter 4 of the EIAR. The centre of the Proposed Wind Farm site is located at the approximate grid reference ITM X 594613 Y650495.

This BEMP has been prepared to outline the proposed biodiversity enhancement measures associated with the Proposed Wind Farm. This BEMP also outlines how the Proposed Wind Farm has been designed to offset any loss of habitat or loss of faunal supporting habitat.

With biodiversity in global decline, and with due consideration of development policy shifts towards avoidance of biodiversity net loss and a drive towards biodiversity net gain, this BEMP has been prepared in respect of the Proposed Wind Farm to take the opportunity to provide a net gain in biodiversity within the Proposed Wind Farm site. The objectives of this BEMP, set out below, align with the goals of the 4th National Biodiversity Action Plan.

1.2 Objectives of the BEMP

The objectives of this BEMP are as follows:

- › To offset any losses of important habitats as a result of the Proposed Project and to ensure an overall net gain in supporting habitats for fauna throughout the Site.
- › To set out the required measures to protect existing high value habitats within the Proposed Wind Farm site.
- › To safeguard, maintain and monitor existing and potential marsh fringing breeding habitat in areas of wet grassland throughout the Site.
- › Planting and management of native woodland and riparian habitat within the Proposed Wind Farm site in order to increase hedgerow, treeline and woodland internal and edge habitat and bolster wildlife corridors.
- › To provide additional foraging areas and nesting opportunities for pollinator species, nesting birds, small mammals etc.
- › To provide a management and monitoring plan to ensure the success of the proposed measures.

Full details on the current ecological baseline of the Proposed Wind Farm site are provided in Section 6.4 of Chapter 6 (Biodiversity) of the EIAR.

1.3 Statement of Authority

This report has been prepared by Stephanie Corkery and reviewed by Caroline Kelly.

Stephanie is an Ecologist with MKO with 3.5 years of experience in professional ecological consultancy. Stephanie holds a BSc. in Ecology and Environmental Biology, an MSc. in Marine Biology, and a HDip in Sustainability in Enterprise, all from University College Cork. Since joining MKO as a graduate in March 2022, Stephanie has worked on a wide variety of projects including wind farms, large scale residential developments, and County Council projects. Stephanie's key strengths include organising and carrying out both terrestrial and marine mammal surveys, as well as general ecological walkover

surveys and bat surveys. She is also experienced in GIS, acoustic data analysis for bat species, and in preparing Appropriate Assessment Screening Reports (AASR), Natura Impact Statements (NIS), Ecological Impact Assessments (EcIA), Biodiversity Chapters, and Bat Reports. Stephanie is also a JNCC Certified Marine Mammal Observer and has completed the ACCOBAMS Course for Highly Qualified Marine Mammal Observers (MMO) and Passive Acoustic Monitoring operators (PAM).

Caroline is a Senior Ecologist with MKO with over ten years' experience in ecological consultancy and is a Full member of the Chartered Institute of Ecology and Environmental Management (CIEEM). Caroline holds a BSc in Environmental Biology from University College Dublin (UCD) and an MSc in Applied Ecological Assessment from University College Cork (UCC). In addition, Caroline has completed an Advanced Diploma in Planning and Environmental Law from Kings Inns Dublin. Prior to taking up her position with MKO in June 2025, Caroline worked as a Principal Ecologist with Scott Cawley Ltd. Caroline has strong generalist field ecology skills and has undertaken a range of ecological surveys including habitat, bird (both breeding and wintering), invasive species and protected fauna surveys. She has strong technical reporting skills and has extensive experience in a range of ecological assessments including Appropriate Assessment and Ecological Impact Assessment. She has undertaken ecological assessments and surveys on a variety of project types (e.g. linear infrastructure projects, industrial, commercial, residential, recreational, tourism and renewable energy developments).

The baseline ecological surveys were conducted by MKO ecologists; Pádraig Desmond, Stephanie Corkery, Deepali Mooloo (B.Sc., M.Sc.), Nora Szijarto (B.Sc., M.Sc.), David Culleton (B.Sc., M.Sc.), Ciara Hackett (B.Sc.), Mairead Kavannah (B.Sc., M.Sc.), Sara Fissolo (B.Sc.), and Molly O' Hare (B.Sc., M.Sc.). All surveyors have relevant academic qualifications and are competent in undertaking the habitat and ecological assessments.

2. ECOLOGICAL BASELINE

Multidisciplinary ecological surveys, comprising walkover surveys, marsh fritillary surveys, badger surveys, bat surveys, bird surveys and invasive species surveys were undertaken by MKO between 2024 and 2025, as detailed within the EIAR submitted as part of the application. A detailed desk study was also undertaken. A high-level overview of habitats and fauna within the Proposed Wind Farm site is provided below.

2.1 Habitats

A detailed account of the habitats, including a habitat map, and associated species found within the Proposed Wind Farm site is found within the EIAR (Chapter 6) which accompanies this application. The following habitats were recorded within the Proposed Wind Farm site and are presented in Table 2-1 below.

Table 2-1 Habitats recorded within the Site.

Habitat Name	Fossitt Code
Conifer plantation	WD4
Improved agricultural grassland	GA1
Wet grassland	GS4
Mixed broadleaved/ conifer woodland	WD2
Wet willow-alder-ash woodland	WN6
Buildings and artificial surfaces	BL3
Scrub	WS1
Dense bracken	HD1
Wet heath	HH3
Hedgerows	WL1
Treelines	WL2
Stone walls and other stonework	BL1
Recolonising bare ground	ED3
Dry meadows and grassy verges	GS2
Eroding/ upland rivers	FW1
Depositing/ lowland rivers	FW2

2.1.1 Annex I Habitats

The following Annex I habitat (as listed under the Habitats Directive) is present within the Proposed Wind Farm site:

- › *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*)

The majority of this habitat is located completely outside of the development footprint of the Proposed Wind Farm, however a small section of access road south of Turbine 3 is located within a degraded area of this habitat as per Section 6.5.2.1.4 of Chapter 6.

2.1.2 Fauna

A number of protected species have been recorded using the Proposed Wind Farm site. Evidence of breeding marsh fritillary (active larval webs and a recording of adult marsh fritillary) were found within the Proposed Wind Farm site. In addition, it is known that bat species, badger, deer, red squirrel, bird

species and pine marten also use the Proposed Wind Farm site. Otter is likely to use the watercourses within the Proposed Wind Farm site and a range of other commonly occurring species are also likely to use the Proposed Wind Farm site, at least on occasion.

3. BIODIVERSITY ENHANCEMENT MEASURES

3.1 Overview

Areas within the Proposed Wind Farm site have been selected for biodiversity enhancement measures as part of the Proposed Project to offset any habitat losses and to enhance the Proposed Wind Farm site for species and habitats known to occur within the area. An overview map of the proposed biodiversity enhancement areas is provided in Figure 3-1.

› **Protection and maintenance of species rich grassland habitat within the Proposed Wind Farm site**

As shown in Figure 3-1, approximately 30.2 ha of important wet grassland habitat will be managed to enhance marsh fritillary habitat, as this species is listed as an Annex II species on the EU Habitats Directive, and known to occur within the Proposed Wind Farm site.

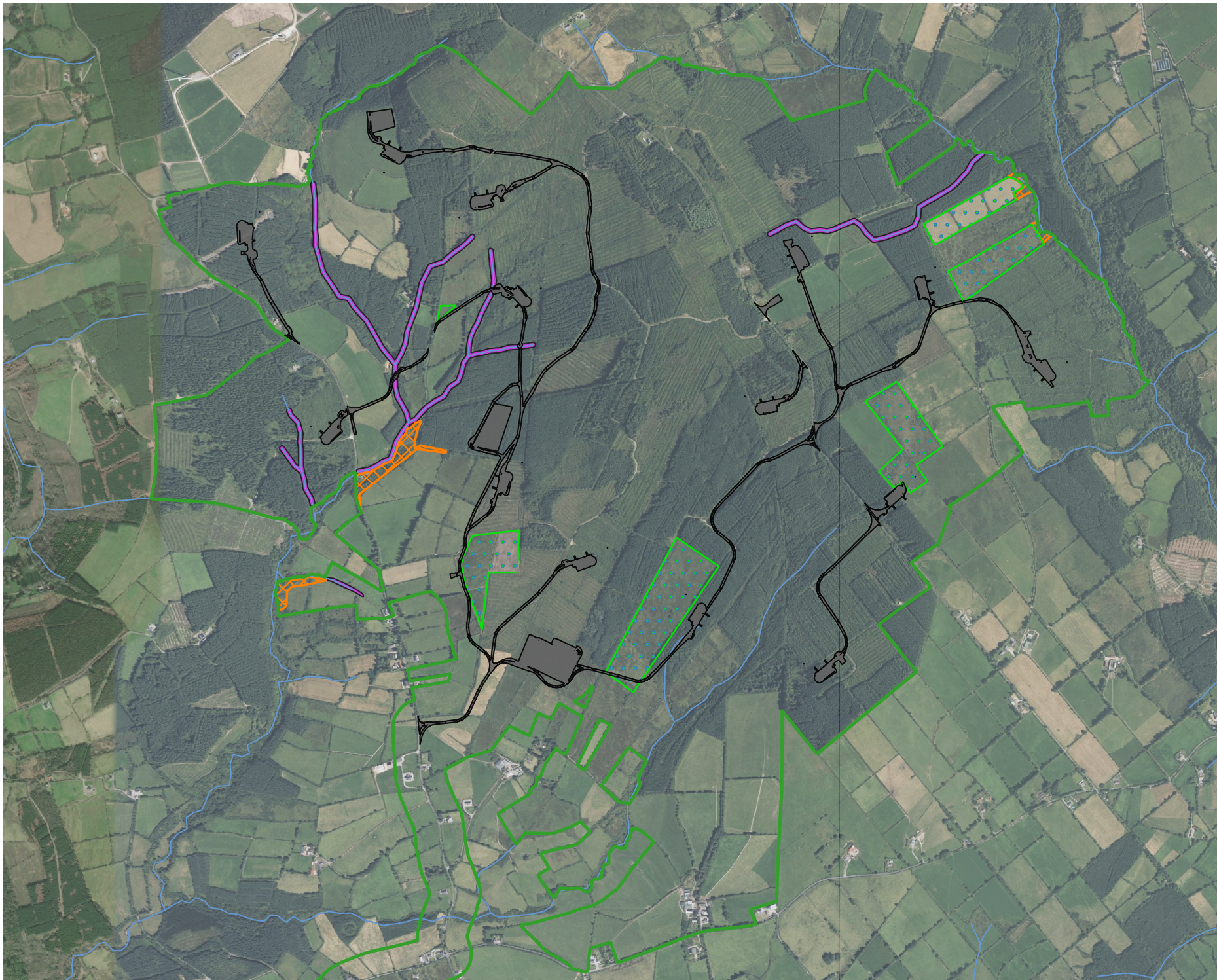
Enhancement will include safeguarding existing marsh fritillary habitat within the Proposed Wind Farm site during construction, in addition to implementing low-intensity management measures during the operation of the Proposed Wind Farm.

› **Native woodland management**

It is proposed to manage and bolster approximately 3.3 ha of semi-natural woodland habitat within the Proposed Wind Farm site, as shown on Figure 3-1. Newly planted trees will be of native origin and will be of advanced nursery stock where possible. This measure will create additional habitat for commuting and foraging fauna, including bats, badger and other protected fauna, within the Proposed Wind Farm site.

› **Riparian woodland planting and linear connectivity**

It is proposed to plant riparian woodland either side of mapped watercourses within the Proposed Wind Farm site, as shown in Figure 3-1. Planting will occur over a 10m wide strip either side of the selected watercourses. This measure will create a linear feature for commuting and foraging fauna, including bats, badger and other protected fauna, within the Proposed Wind Farm site. Additionally, this measure will provide bank stabilisation benefits which will have a knock-on effect of reducing sedimentation runoff into adjacent watercourses.



Map Legend

-  EIAR Site Boundary
-  Permanent Footprint
-  WFD Watercourses
-  Proposed Wet Grassland Management
-  Proposed Woodland Management
-  Proposed Riparian Buffer



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Drawing Title	
Proposed Biodiversity Enhancement	
Project Title	
Carrow Wind Farm	
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3.2 Protection and maintenance of species rich grassland habitat within the Proposed Wind Farm site

3.2.1 Construction Phase

Existing marsh fritillary breeding habitats that occur adjacent to proposed works areas will be fenced off in advance of construction of the Proposed Wind Farm. These areas were identified during initial ecological surveys of the Proposed Wind Farm site, and the Proposed Wind Farm was designed to avoid these areas. The fencing will contain signage strictly prohibiting entry to these areas. This will denote the area where strictly no machinery, storage of materials or entry of construction site personnel will be permitted. The protective fencing will be inspected and signed off by the supervising Ecological Clerk of Works (ECOW) prior to commencement of the Proposed Project. As described in Chapter 6 of the EIAR, the following protective measures will be in place:

- › A pre-commencement survey will be carried out to confirm whether any suitable areas for marsh fritillary have been established between planning being granted (if approved) and the commencement of construction works.
- › Existing marsh fritillary breeding areas will be fenced off with a minimum buffer of 5 metres. This includes the areas of breeding marsh fritillary habitat west of the proposed Turbine 3.
- › The construction works area for proposed Turbine 3 and associated site access routes will be fully fenced off (with solid hoarding where possible) to ensure there is no access or egress to adjacent areas of sensitive habitat.
- › ECOW supervision will be required for construction of components near existing breeding areas.

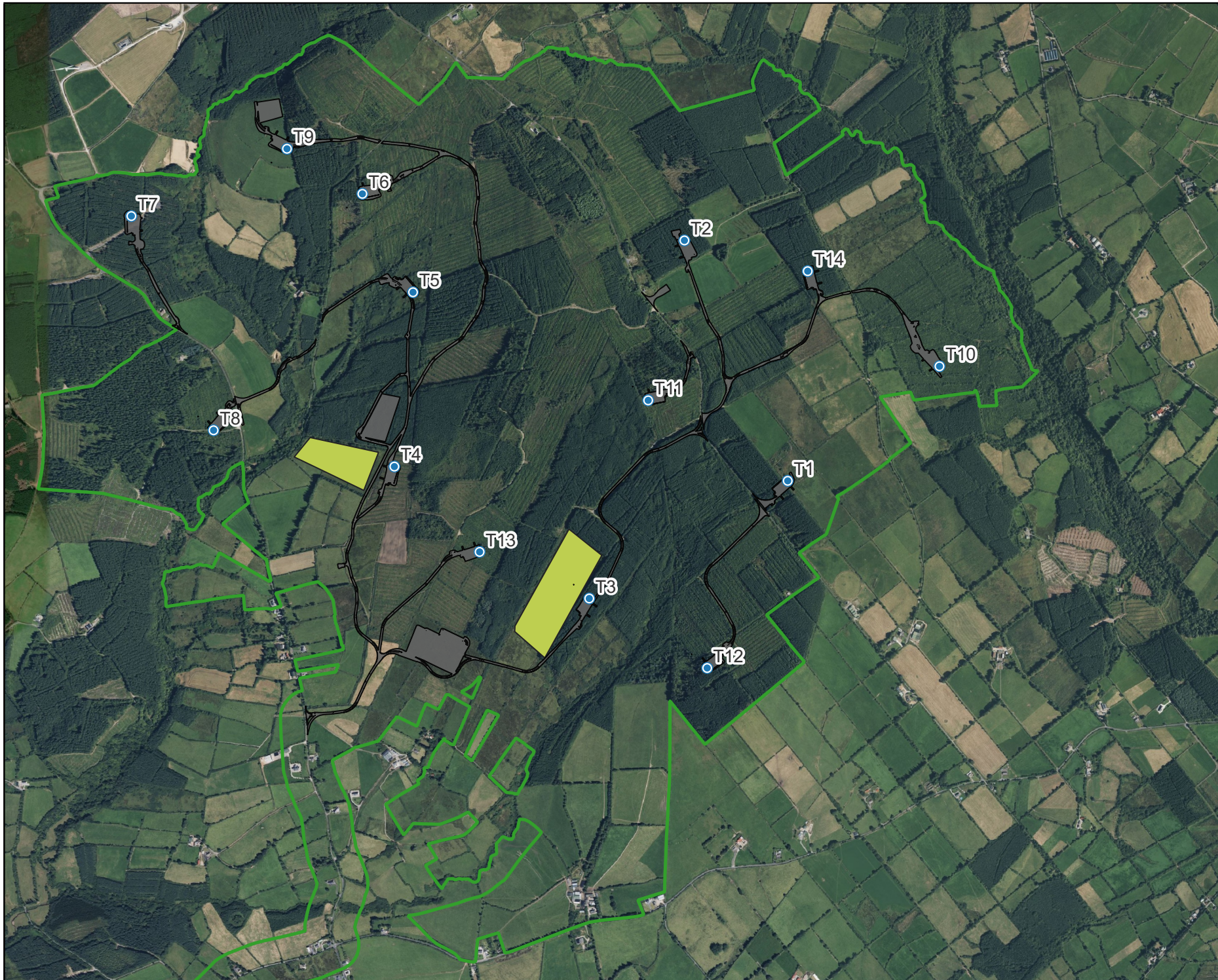
Further protective mitigation measures for marsh fritillary and other habitats during construction phase of the Proposed Project are outlined in Chapter 6 of the EIAR.

3.2.2 Operational Phase





During the operation of the Proposed Wind Farm, it is proposed that areas of species diverse grassland throughout the site, as shown in Figure 3-1, are safeguarded. This includes the identified breeding area west of Turbine 3 within the Proposed Wind Farm site, as shown in Figure 3-2 below. It has been agreed that these areas will be protected from development, land clearance or use conversion, or significant agricultural works for at least the duration of this BEMP. The grasslands will be included as part of the Monitoring Plan for the Proposed Project (Section 4 below) and will be subject to the below listed low-intensity management measures. During the course of the Monitoring Plan, throughout the operation of the Proposed Wind Farm, the Project Ecologist may prescribe alternative management measures for these areas in order to maintain or increase their value for marsh fritillary:

- › Sheep grazing is unsuitable as they will graze selectively for flowers. Grazing only by cattle.
- › Use of supplementary feeding within identified potential marsh fritillary habitat is prohibited.
- › If grazing the fields, a stocking level of no more than 0.5LU/ha will be applied. However, the stocking rate is to be subject to monitoring and altered as required. The goal is to have a structured sward between 12 and 25cm in height.
- › Avoid mowing as this removes variations in sward height.
- › No fertiliser, slurry, herbicide, pesticide usage.
- › Field operations such as rush or scrub control should only be carried out November to February when caterpillars are in hibernation and less subject to disturbance, and outside of bird nesting season.

- › The proposed spoil and repository areas will be allowed to be revegetated naturally given the existing seed bank and will be subject to the above measures once grassland has established. This will ensure a sword of local provenance to the area.



Map Legend

-  EIAR Boundary
-  Development Footprint
-  Proposed Turbine Layout
-  Devil's-bit scabious



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Drawing Title

Diverse wet grassland habitat containing devil's-bit scabious

Project Title

Carrow Wind Farm

Drawn By

SC

Checked By

PD

Project No.

231102

Drawing No.

Figure 3-2

Scale

1:20,000

Date

14.01.2026



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3.3 Native Woodland

Areas highlighted for woodland enhancement/management in Figure 3.1 comprise stretches of semi-natural woodland, which includes species such as willow, alder, hawthorn, ash, and oak. This amounted to approximately 3.3 ha. To ensure that these areas are maintained as such, the following measures will be undertaken:

- › The woodlands will be surveyed for the presence of non-native invasive species and should it be required, a management plan for invasive species will be established.
- › Additionally, as the areas are surrounded by Sitka spruce forestry, measures will be implemented to ensure that these species do not establish within the woodland. Any Sitka spruce saplings establishing within these areas will be removed.

3.3.1 Native Woodland Planting

It is proposed to bolster approximately 3.1 ha of existing woodland with new planting, as shown on Figure 3-1. Trees will be of native origin and will be of advanced nursery stock where possible. The following species which are common to the locality will be used:

- › Pedunculate oak (*Quercus robur*)
- › Sessile oak (*Quercus petraea*)
- › Hazel (*Corylus avellana*)
- › Alder (*Alnus glutinosa*)
- › Downy Birch (*Betula pubescens*)
- › Rowan (*Sorbus aucuparia*)
- › Grey willow (*Salix cinerea*)
- › Goat willow (*Salix caprea*)
- › Hawthorn (*Crataegus monogyna*)

The following measures should be followed when planting trees:

- › Mark out the area for planting so it is clear exactly where planting will be established.
- › Use thin stakes or sticks to mark the rows or areas of trees to be planted.
- › It is recommended that there are 2m spacings between trees. Shelterbelt planting may be applied by planting up two lines of trees as a staggered row.
- › Protective tree guards will be erected around each planted sapling. Tall tube tree guards should be used to protect against both rabbits and deer.

3.3.1.1 Native Woodland Management

In order to facilitate the successful establishment of the new trees to be planted within the Proposed Wind Farm site, the following measures are proposed:

- › Protective tree guards will be erected around each planted sapling. Tall tube tree guards should be used to protect against both rabbits and deer.
- › New tree planting will be kept weed and litter free until the new plants are established after two years, particularly from ruderal weeds. Healthy growth will be maintained by allowing the plant to occupy as much of the planting areas as possible to allow them to achieve as close to their natural form as possible.
- › During spring and autumn maintenance periods all trees and plants will be checked and adjusted/replaced as required, soil firmed, and any dead wood present removed back to healthy tissue and mulch added if required. Where tree guards are no longer required these will be removed to avoid damage to the tree.

- › Hedgerows and replanted trees will be inspected following the main growing season (i.e. in September) for the first five years of growth, where the requirement for replacement planting will be assessed. If any trees are dead or damaged these will be replaced using the same species within the next planting season. Recommendations for ongoing or remedial management required will be specified within a Monitoring Report (see Section 4).

3.4 Riparian Woodland Buffer and Linear Connectivity

The Proposed Wind Farm site is dominated by conifer forestry, which in due course, will be felled for lumber. Forestry edges currently provide linear foraging and commuting corridors for protected species such as bats. Whilst areas of this forestry are delineated by narrow treelines of deciduous species, once the forestry is felled (outside of this planning application), there will be a significant reduction in foraging/commuting corridors for faunal species.

In an effort to create a permanent corridor from the Proposed Wind Farm site to the wider environment, it is proposed to plant approx. 10m of riparian woodland either side of mapped watercourses within the Proposed Wind Farm site. These watercourses include several unnamed Order 1 streams, an unnamed Order 2 stream, the Scarrough 16 Order 1 stream [EPA Code: 16S38], Lackenacombe Order 1 and Order 2 stream [EPA Code: 16L73].

This will amount to approx. 9.9 ha of riparian woodland planting, with a total of approx. 10.3km of woodland edge habitat. This area has been selected as, once established, it will create a permanent corridor for protected fauna from the Proposed Wind Farm site to lands within the wider area, thereby enhancing ecological connectivity. It will also connect into the existing treelines and forestry currently within the Proposed Wind Farm site.

3.4.1 Tree Planting

Native trees to the Irish landscape of local provenance and typical of riparian woodland will be used to create this riparian woodland. All trees will be a minimum of 1m in height when planted.

Table 3-1 provides a list of the trees to be planted, with the planting size of planting mix.

Table 3-1 Schedule of trees to be planted.

Species	Size
Alder (<i>Alnus glutinosa</i>)	Bare root (2-3ft)
Silver Birch (<i>Betula pendula</i>)	Bare root (2-3ft)
Downy Birch (<i>Betula pubescens</i>)	Bare root (2-3ft)
Pedunculate Oak (<i>Quercus robur</i>)	Bare root (2-3ft)
Goat Willow (<i>Salix cinerea</i>)	Bare root (2-3ft)
Grey Willow (<i>Salix cinerea</i>)	Bare root (2-3ft)
Bay Willow (<i>Salix pentandra</i>)	Bare root (2-3ft)
Mountain Ash (<i>Sorbus aucuparia</i>)	Bare root (2-3ft)

The following measures will be followed when planting trees and have been informed by Agri-Climate Rural Environment Scheme (ACRES) (2024) guidance:

- > All planting will be carried out by hand and will be undertaken by a suitably qualified arborist.
- > Planting will be undertaken in the dormant season, between November and March.
- > When planting trees, tree planting density should be kept sufficiently low to allow establishment of ground story vegetation. Planting small groups of 10 trees with 2.5m spacing between the trees, and 10m spacing between the groups, is recommended.
- > Trees will be pit planted, in areas of clear vegetation. This involves using a spade to dig a hole with tree roots placed in the centre. Soil is then placed around the tree and firmed in, ensuring the tree is upright.
- > It is recommended that there are 2.5m spacings between trees. Shelterbelt planting may be applied by planting up to two lines of trees as a staggered row.
- > Trees should be planted within a vegetation-free area, at least 1m in diameter.
- > Mark out the area for planting so it is clear exactly where planting will be established.
- > Use thin stakes or sticks to mark the rows or areas of trees to be planted.
- > Rabbit, hare, and deer proof tree guards will be placed around each new tree.

3.4.1.1 Riparian Woodland Management

The management of riparian woodland throughout the Proposed wind Farm site will follow the measures outlined for Native Woodland Management set out in Section 3.3.1.1 above.

Invasive Species

Two species listed under the First Schedule of the European Union (Invasive Alien Species) Regulations 2024 (S.I. 374 of 2024) and the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 477 of 2011) were recorded within the Proposed Wind Farm site during the surveys undertaken.

Japanese Knotweed (*Reynoutria japonica*) and Giant Knotweed (*Reynoutria sachalinensis*) were recorded within the Proposed Wind Farm site.

Full details of these findings are provided the Invasive Species Management Plan (ISMP) in **Appendix 6-5** of the EIAR, as well as the proposed management measures to be implemented as part of the development. The implementation of the proposed ISMP will remove the threats posed on native habitats within the Proposed Wind Farm site, as a result of the impacts on invasive species. While this is included as a separate Appendix, this is also considered a biodiversity enhancement.

4. MONITORING

A site-specific monitoring and evaluation programme is necessary to ensure that the success of the proposed measures remains long-term. It will also assist in situations where the habitat establishment may not have been successful by providing evidence of shortcomings, allowing a revised management plan to be formulated.

Monitoring results will be reported by the Project Ecologist within an Annual Environmental Report. Reports detailing the monitoring works carried out, the results obtained and a review of their successes, along with any suggestions for amendments to the plan will be prepared. The BEMP will be updated and amended where required to improve the efficacy of the enhancement measures.

Table 4-1 Monitoring of BEMP measures.

Feature	Frequency	Measures
Wet Grassland Management	<p>Habitat suitability condition assessments of potential marsh fritillary habitat, as per methodology designed by the National Biodiversity Data Centre¹, will take place in the following years of the Proposed Project:</p> <ul style="list-style-type: none"> › 1 Year, › 3 Years, › 7 Years, › 10 Years, › 15 Years, › 20 Years. 	<ul style="list-style-type: none"> › The results of the marsh fritillary breeding habitat suitability assessments will inform whether adaptive management measures need to be introduced to improve the condition of the habitats for marsh fritillary. › Monitoring surveys will also include presence/absence surveys for marsh fritillary larvae. › These will be carried out in accordance with best practice guidance (NRA 2009) and the National Biodiversity Data Centre (NBDC) Marsh Fritillary survey methodologies for larval web surveys². › Monitoring should be carried out between August and September when devils bit scabious is in flower. Occupied larval webs will be recorded.
Native Woodland Management	<p>To confirm that the proposed habitat creation and enhancement has been successful, these habitats will be monitored by a qualified ecologist at the following intervals:</p> <ul style="list-style-type: none"> › 6 Months, › 1 Year, › 2 Years, 	<ul style="list-style-type: none"> › The entire enhancement area will be walked/surveyed to ensure all planted trees are healthy. Should dead/dying trees be identified, additional planting will be required to fill any gaps.
Riparian Planting and Linear Connectivity		

¹ <https://biodiversityireland.ie/app/uploads/2021/11/Marsh-Fritillary-Habitat-Condition-Form.pdf> (Accessed 14th of January 2026)

² <https://biodiversityireland.ie/app/uploads/2021/11/Marsh-Fritillary-Larval-Survey-Form.pdf> (Accessed 14th of January 2026)

	<ul style="list-style-type: none"> > 3 Years, > 4 Years, > 5 Years. <p>At the end of the 5-year monitoring plan as outlined above, the Project Ecologist will assess the need for and frequency of further monitoring of the target habitats in agreement with the wind farm operator.</p>	
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4.1 Responsibility for Implementing the Measures

Should the Proposed Project be granted, the Applicant will be bound by the permission and associated conditions, as well as the mitigations and measures detailed in the EIAR, including the proposals for habitat loss offsetting and biodiversity enhancement proposals detailed in this document.

The Applicant will be responsible for overseeing the preparation of the farm/landholding level plans and will be responsible for providing the landowner with an agricultural consultant and ecologist.

The Applicant will be responsible for preparing and overseeing the preparation of farm plans, as well as auditing the land holdings, determining if the measures are achieving the desired results and, where necessary, amending the plan to achieve the required results. The farm plan and monitoring programme will be in place for the lifetime of the Proposed Project.

5. CONCLUSION

This BEMP sets out the measures to be implemented to ensure that the Proposed Project will offset any associated habitat loss, will ensure the enhancement of existing habitats within the Proposed Wind Farm site, while also allowing for a net gain in biodiversity to be achieved throughout the Proposed Wind Farm site.

Habitats classified as being of Local Importance (higher value) and above that will be lost within the Site to facilitate the construction of site infrastructure includes approximately 2.5 km of linear habitat (hedgerows and treelines), 2.5 ha of wet willow-alder-ash woodland, 0.16 ha of mixed broadleaved/conifer woodland, 0.2 ha of species rich wet grassland.

The objectives of this BEMP will be achieved through the measures outlined in Section 3 of this report which included for the management of approximately 30.2 ha of grassland habitat, the establishment and management of 3.3 ha of woodland habitat, in addition to the planting of approximately 9.9 ha of riparian woodland habitat. This equates to an addition of approximately 10.3 km of commuting habitat for fauna throughout the Proposed Wind Farm site. It also provides for monitoring of the target habitats by an ecologist to ensure the success of the measures outlined in the BEMP.

Following its successful implementation and monitoring, this BEMP will result in a significant improvement in supporting habitat for wildlife throughout the Site, including marsh fritillary, bat and bird species by providing improved feeding, foraging and breeding habitat.

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