



Your Ref: ACP-324164-26

Our Ref: SID-TN-2026-012

(Please quote in all related correspondence)

10 July 2026

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Via email to laps@pleanala.ie

Re: Notification under the Planning and Development Act, 2000, as amended.

Proposed Strategic Infrastructure Development (SID): Renewable energy development Carrow Wind Farm which will include 14 no. wind turbines and associated infrastructure in the townlands of Carrow and adjacent townlands, Co. Tipperary, including underground cabling to connect to the proposed 110kV onsite substation, electrical cabling for 110kV grid connection to the existing Kilonan 110kV Substation, in the townlands of Kilonan and adjacent townlands, Co. Limerick, and all associated infrastructure and works in the townlands of Carrow and adjacent townlands with connection to Substation, in the townlands of Kilonan and adjacent townlands, County Limerick.

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I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department under the stated heading.

Nature Conservation

Ecological impact assessment

Bat species

The Department considers that further clarification and details are required in relation to several aspects of the bat survey report.



Results from only four static detectors have been presented for 2023, although twelve were deployed that year, as indicated in Figure 3.1. The four static detectors for which 2023 results have been provided were all located in the south/southeast part of the site, meaning that no static detector data is available for the north/northwest part of the site for 2023. Data from D08 (2023), D09 and D12 in particular may have had a significant bearing on the overall impact assessment, given the high activity levels recorded in the area encompassed by Turbines 7,8,5,6 and 9, which incorporates three confirmed roosts.

Notwithstanding the above, the existing results from transect and static surveys from this part of the site indicate a high level of bat usage; particularly by Soprano and Common Pipistrelles, which are high collision-risk species. The overall collision risk has been assessed at site level and has not apparently taken into account any within-site factors which might influence the risk at particular turbines, such as the presence of several roosts within one part of the site as outlined above. In this regard, the use of "typical" or median activity at site level as the criterion for assessment based on habitat distribution is questioned.

High median activity levels were recorded for several detectors elsewhere in the site, and to offset the risk associated with this, the proposed mitigation includes the creation of buffer zones by felling, and ongoing monitoring and adaptive mitigation. However, if the proposed buffer width is implemented around turbines, it would appear that for static D06 there would be no change in cover around the nearby T13, which is already located in the open; and therefore no reduction in risk associated with creation of a buffer zone. D06 and D02, which also recorded high median activity levels, are located on open ground at approximately the proposed buffer distance from the forestry edge, which would seem to call into question the effectiveness of buffer zone creation as a measure for reducing activity levels and therefore collision risk at this site. No data is available for bat activity levels in open areas at turbine height, as the static surveys were at ground level.

The Collision Risk summary (Section 5.1.3) includes the following:-

"After year 1 monitoring, if a curtailment requirement is identified (i.e. significant bat fatalities encountered), a curtailment programme, in line with relevant guidelines, will be devised around key activity periods and weather parameters, as well as a potential increase in buffers." This measure does not rule out serious consequences for the bat roosts on site in the event of significant mortality of colony members in the short term, particularly if the buffers are of limited effect.

It is recommended that a targeted mitigation plan for the roosts on site is produced, based on survey and identification of the main emergence and commuting directions from the roost,



and including reasoned and specific proposals for the development of appropriate alternative foraging areas which can be reached from the roosts without passing through turbine areas. An example might be the western margin of that corner of the site approximately 0.5 kilometres to the west of T08, accessible from the two largest roosts.

Kestrel (Annex I; Red listed)

Four breeding Kestrel pairs have been observed on and adjacent to the proposed site, and Kestrels have been observed flying at rotor height. The collision risk has been estimated at 5.4 collisions per year. However, this has been assessed at county level as not significant. The Department considers that this collision risk at site level is highly significant and given that it is related to a breeding population, has implications for breeding success and recruitment, and could potentially lead to the loss of Kestrel as a breeding species from the locality.

The proposal to erect four Kestrel boxes along the site margins as an enhancement measure is also of concern, given the observed usage of the site by Kestrels breeding in adjacent areas, and the projected collision risk.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie, or to the following address:

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90

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A handwritten signature in blue ink, appearing to read 'Julie Sullivan'.

Julie Sullivan
Assistant Principal
Development Applications Unit
Administration