

**From:** [Housing Manager DAU](#)  
**To:** [SIDS; LAPS](#)  
**Subject:** ACP-324164-26  
**Date:** Wednesday 27 May 2026 16:24:36  
**Attachments:** [ACP-324164-26 Tipperary SID-TN-2026-012.pdf](#)

---

**Caution:** This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

A chara,

Please find attached heritage related observations/recommendations for the above mentioned planning application.

Kindly forward a copy of your decision to [manager.dau@npws.gov.ie](mailto:manager.dau@npws.gov.ie) as soon as it issues.

In addition, please acknowledge receipt of the attached letter (as required under Article 29(2) of the Planning & Development Regulations 2001).

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at: [manager.dau@npws.gov.ie](mailto:manager.dau@npws.gov.ie)

Kind regards,

**Cormac O'Flaherty**  
*Higher Executive Officer*

**Aonad na nIarratas ar Fhorbairt**  
*Development Applications Unit*  
**Oifigí an Rialtais**  
*Government Offices*

**Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90**  
Newtown Road, Wexford, County Wexford, Y35 AP90



Your Ref: **ACP-324164-26**  
Our Ref: **SID-TN-2026-012**

27 May 2026

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

Via email to [sids@pleanala.ie](mailto:sids@pleanala.ie) ; [laps@pleanala.ie](mailto:laps@pleanala.ie)

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

**Proposed Strategic Infrastructure Development (SID): Carrow Renewable Energy Limited: 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, Co. Limerick.**

A chara

I refer to correspondence in connection with the above. Outlined below are heritage-related observations/recommendations coordinated by the Development Applications Unit under the stated headings.

### **Archaeology**

It is noted that the EIAR submitted as part of the planning application includes a desk-based Archaeological Impact Assessment (AIA), which was carried out in relation to the proposed development by IAC Ltd (EIAR Chapter 13; date March 2026).

The EIAR acknowledges that there is a potential that previously unknown sub-surface archaeological features or deposits may be present within the proposed development site (PDS) which may be negatively impacted by the proposed development. It is noted that no advance archaeological investigations have been carried out within the PDS to inform the EIAR, other than a walkover survey. The Department advises that advance archaeological test excavation should be carried out in advance of any development to determine if previously unknown sub-surface archaeological features or deposits are present. If such material is present, then additional mitigation measures to ensure the preservation in situ or



preservation by record (i.e. full archaeological excavation) of such discoveries will be necessary. It is advised that this can be addressed by the inclusion of an appropriate condition, if the development is permitted.

The wider landscape of the scheme includes the Rock of Cashel, located c. 14.7km southeast of the PDS (at its nearest point). The Rock of Cashel is one of six focal sites within the group listing for the Royal Sites of Ireland which has been included in the current Tentative List for inscription as a World Heritage Site. It is not yet formally designated as a World Heritage Site. However, the site is a National Monument in the ownership or guardianship of the Minister and subject to statutory protection under section 14 of the National Monuments Act 1930-2014.

The Department notes that EIAR includes a Landscape and Visual Impact Assessment (LVIA) for the Rock of Cashel (EIAR Chapter 14; March 2026). The LVIA has had regard to the UNESCO *Guidance and Toolkit for Impact Assessments in a World Heritage Context* and (in the context of a wind energy project) the UNESCO *Guidance on Wind and Solar Energy Projects in a World Heritage Context*. An integrated assessment of the potential effects of the proposed scheme to the setting of vulnerable heritage receptors including Rock of Cashel is set out across Chapters 13 and 14 of the EIAR (dealing with Cultural Heritage, and Landscape and Visual respectively). The EIAR has concluded that the operation of the proposed scheme would result in a slight (negative) impact in relation to the setting of the Rock of Cashel.

The Department notes that the proposed development includes for a Biodiversity Management and Enhancement Plan (BMEP) to offset the loss of habitats identified within the PDS and to further enhance the biodiversity of the site and its environs (EIAR Section 4.3.1.6). A number of areas across the PDS are proposed for biodiversity enhancement measures as shown on the site layout drawings (Appendix 4-1) and proposed BMEP (Appendix 6-1). These land parcels include a parcel of land located immediately east of Turbine 1 (Figure 1).

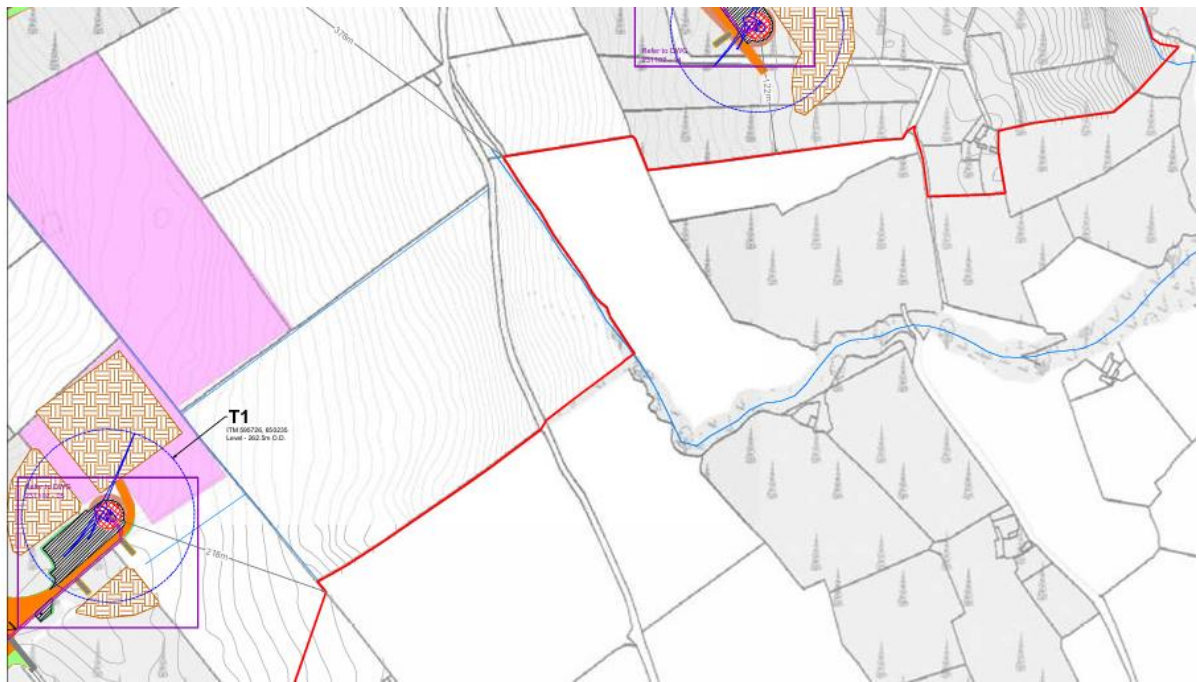


Figure 1—Excerpt from EIAR Appendix 4-1: Site Layout Plan Sheet 4 of 34

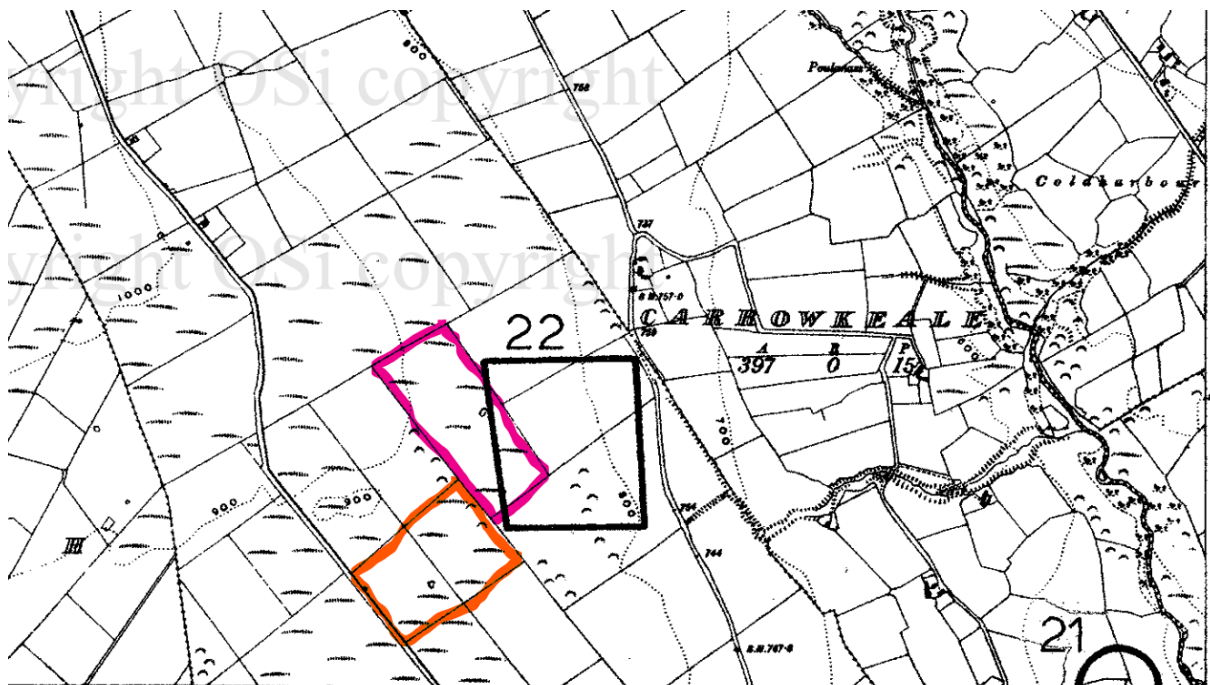


Fig 2—Excerpt from Tipperary RMP Sheet 45 with Biodiversity Enhancement Area (pink) and general location of Turbine 1 and associated infrastructure (orange)



This land parcel partially incorporates the mapped extent of Recorded Monument TS045-022002- (Field system). It is noted that no assessment of the potential effects (positive or negative) of any proposed biodiversity enhancement measures has been carried out as part of the EIAR. If Further Information is being requested by the Board, it may be beneficial to consider including clarification of this as part of the request.

Notwithstanding this, the Department, therefore, advises that the following should be included as a condition of any grant of permission. Note these recommended conditions align with Sample Conditions C3, C5 and C6 as set out in *OPR Practice Note PN03: Planning Conditions* (October 2022), with appropriate site-specific additions/adaptations based on the particular characteristics of this development and informed by the findings of the EIAR.

**Archaeological Requirements:**

1. All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 13 of the EIAR (IAC Ltd; date March 2026) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
2. The developer shall engage a suitably qualified archaeologist (licensed under the National Monuments Acts) to carry out pre-development archaeological testing in areas of proposed ground disturbance and to submit an archaeological impact assessment report for the written agreement of the planning authority, following consultation with the Department, in advance of any site preparation works or groundworks, including site investigation works/topsoil stripping/site clearance and/or construction works.
  - a. The report shall include an archaeological impact statement and mitigation strategy. Where archaeological material is shown to be present, avoidance, preservation in-situ, preservation by record (archaeological excavation) and/or monitoring may be required.
  - b. Any further archaeological mitigation requirements specified by the planning authority, following consultation with the Department, shall be complied with by the developer.
  - c. No site preparation and/or construction works shall be carried out on site until the archaeologist's report has been submitted to and approval to proceed is agreed in writing with the planning authority.
3. The Construction Environment Management Plan (CEMP) shall include the location of any and all archaeological or cultural heritage constraints relevant to the proposed development as set out in Chapter 13 of the EIAR and by any subsequent archaeological investigations associated with the project. The CEMP shall clearly describe all identified likely archaeological impacts, both direct and indirect, and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during all phases of site preparation and construction activity.
4. The planning authority and the Department shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any archaeological investigative work/excavation required, following the completion of all



archaeological work on site and any necessary post-excavation specialist analysis.  
All resulting and associated archaeological costs shall be borne by the developer.

**Reason:** To ensure the continued preservation (either *in situ* or by record) of places, caves, sites, features or other objects of archaeological interest.

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

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

Is mise, le meas

---

Julie Sullivan  
Assistant Principal  
Development Applications Unit  
Administration