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Subject: ACP-324164-26 Carrow Windfarm
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Attachments: [CE Report SID Carrow.pdf](#)
[Carrow Windfarm Resolution & Minutes.pdf](#)

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A Chara,

I attach Tipperary County Council's CE report on Carrow Windfarm with resolution and minutes of the May monthly meeting and a special meeting also held in May.

Please acknowledge receipt at your convenience please.

Kind Regards,
Ann-Marie

Ann-Marie Keaveney

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Comhairle Contae Thiobraid Árann
Tipperary County Council

Chief Executive Officer's Report

In accordance with the requirements of Section 37E (4) and 37E (5) of the Planning and Development Act 2000 (as amended)

April 2026

An Coimisiún Pleanála Reference. No:	ACP 324164-26
Applicant:	Carrow Renewable Energy Ltd subsidiary of Atlantic Infrastructure Renewables Ltd. (AIR) (Carrow Wind Farm)
Agents:	MKO
Site Location:	Townlands of Carrow, Moheragh, Carrowkeale, Glenpaudeen, Scarrough, Camus, Ballynahinch, Kilshenane, Dundrum, Gortarush Lower, Ballybrack, Ballysheeda, Shanaknock, Rahyvira, Newtown North, Glassdrum, Greenfield, Cappagh, Philipston, Knockane, Kilbeg, Moher East, Shanacloon, Toem, Moher West, Cahernahallia, Gortaderry, Co. Tipperary.
Proposed Development:	Proposed renewable energy development including 14 wind turbines, 110kV underground cabling connection, and all associated infrastructure and works



Table of Contents

INTRODUCTION & PURPOSE OF THE REPORT	1
Introduction	1
The Purpose of this Report.....	1
SITE LOCATION & DEVELOPMENT DESCRIPTION OVERVIEW	2
Site location	2
Proposed Development	7
POLICY CONTEXT & GUIDANCE	9
EU Directives and Policies	9
EU Renewable Energy Directive 2009/28/EC	9
Revised Renewable Energy Directive II (2018/2001/EU)	9
European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. No. 274 of 2025)	9
European 2020 Strategy for Growth	9
2030 Climate and Energy Framework	10
Energy Roadmap 2050	10
European Green Deal	10
National Policy	10
Climate Action and Low Carbon Development (Amendment) Act 2021	10
Climate Action Plan 2023	11
Climate Action Plan 2024	11
Climate Action Plan 2025	11
Project Ireland 2040: The National Planning Framework 2018	12
Project Ireland 2040: The National Planning Framework: First Revision April 2025	12
Section 28 Ministerial Guidelines	13
Wind Energy Development Guidelines 2006	13
Draft Wind Energy Development Guidelines 2019	13



Regional Level	13
Southern Regional Spatial and Economic Strategy (RSES)	13
County Development Plan.....	14
Tipperary County Development Plan 2022-2028	14
Tipperary Renewable Energy Strategy (Appendix 2 Volume 3 of TCDP 2022-2028)	20
Local Authority Climate Action Plan 2024	22
PLANNING HISTORY	22
Existing and current planning applications on site.....	22
Pre-Planning Consultation.....	24
INTERNAL DEPARTMENT REPORTS	24
Introduction	24
Report of the Municipal District Engineer	24
Report of the Environment & Climate Action Section	26
Report of Biodiversity Officer	28
ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR)	29
Introduction	29
Observations on the EIAR.....	30
Chapter 1 Introduction	30
Chapter 2 Background to the Proposed Project	30
Existing Operations	30
Comments on Chapter 2	31
Chapter 3 Considerations of Reasonable Alternatives	32
Consideration of alternative	32
Comments on Chapter 3	32
Chapter 4 Description of the Proposed Project	33
Consideration of Proposed Development	33
Comments on Chapter 4	34



Chapter 5 Population and Human health	35
Issues considered	35
Comments on Chapter 5	35
Chapter 6 Biodiversity	36
Issues considered	36
Comments on Chapter 6	36
Chapter 7 Ornithology (Birds)	38
Issues considered	38
Comments on Chapter 7	38
Chapter 8 Land, Soils & Geology	40
Issues considered	40
Comments on Chapter 8	41
Chapter 9 Hydrology and Hydrogeology	42
Issues considered	42
Comments on Chapter 9	43
Chapter 10 Air Quality	45
Issues considered	45
Comments on Chapter 10	45
Chapter 11 Climate	45
Issues considered	45
Comments on Chapter 11	45
Chapter 12 Noise & Vibration	46
Issues considered	46
Comments on Chapter 12	46
Chapter 13 Archaeological, Architectural and Cultural Heritage	48
Issues considered	48
Comments on Chapter 13	49



Chapter 14 Landscape and Visual	50
Issues considered	50
Comments on Chapter 14	51
Chapter 15 Material Assets (including Traffic and Transport, Telecommunications and Aviation	52
Issues considered	52
Comments on Chapter 15	53
Chapter 16 Major Accidents and Natural Disasters	54
Issues considered and comments	54
Chapter 17 Interactions	55
Issues considered	55
Comments on Chapter 17	55
Chapter 18 Schedule of Mitigation Measures	55
NATURA IMPACT STATEMENT	56
Designated Sites.....	56
Potential Impacts Identified in the NIS	57
Mitigation measures proposed to avoid/manage impacts.....	57
NIS Conclusion:	57
Comments on Natura Impact Statement.	57
KEY ISSUES AND OVERALL CONSIDERED VIEW	59
Introduction	59
Principle of Development.....	59
Visual Impact	59
Noise Impacts	59
Shadow Flicker Impacts	59
Traffic Impacts	60
Hen Harrier	60
Bats.....	60



Cumulative Impacts.....	61
Flood Risk and impact on environmental management and mitigation	61
Alternatives.....	61
Conclusion	61
CONDITIONS AND CONTRIBUTIONS	62
Conditions	62
General Contributions	62
Special Contributions	62
Bond.....	63
Appendix 1 – Recommendations of the Elected Members	64
Appendix 2 – Internal Reports	65
Report from Tipperary-Cahir-Cashel- Municipal District Engineer	65
Report from Environment and Climate Action Section	67
Report from Biodiversity Officer	70
Figure 1 Site location	5
Figure 2 Grid Connection Route	6
Figure 3 Planning Register with relative to Wind Farm site	23
Figure 4 Proposed Site Layout	31
Figure 5 Proposed Wind Farm	33
Figure 6 Regional Hydrology Map (Pg. 15)	43
Figure 7 Noise Sensitive Location	46
Figure 8 Landscape Policy Context	50
Figure 9 Glencarby Viewpoint VP09.....	51
Figure 10 Turbine Delivery Route Figure 15-1a in Appendix 15-3.....	52
Figure 11 European Designated sites relative to the proposed site	56



INTRODUCTION & PURPOSE OF THE REPORT

Introduction

On the 23rd March 2026, An Coimisiún Pleanála (ACP) determined that a proposal by Carrow Renewable Energy Ltd (hereafter the applicant) for a proposed renewable energy development including 14 wind turbines, 110kV underground cabling connection, and all associated infrastructure and works in the townlands of Carrow, Moheragh, Carrowkeale, Glenpaudeen, Scarrough, Camus, Ballynahinch, Kilshenane, Dundrum, Gortarush Lower, Ballybrack, Ballysheeda, Shanaknock, Rahyvira, Newtown North, Glassdrum, Greenfield, Cappagh, Philipston, Knockane, Kilbeg, Moher East, Shanacloon, Toem, Moher West, Cahernahallia, Gortaderry, Co. Tipperary; would be strategic infrastructure within the meaning of Section 37E of the Planning and Development Act 2000 (as amended), hereafter referred to as the Act.

An application for permission for the proposed development was therefore submitted directly to An Coimisiún Pleanála available to view at <https://www.pleanala.ie/en-ie/case/324164>. The application is also available to view at <https://carrowwindfarm.com/>

An Coimisiún Pleanála informed Tipperary County Council on 31st March 2026 in a letter dated 30th March 2026 of the receipt of the Strategic Infrastructure Development (SID) application.

This report is submitted to ACP in accordance with Section 37E(4) of the Act.

The Purpose of this Report

As provided for under Section 37E(4) of the Act, the Chief Executive is required to submit a report to An Coimisiún Pleanála setting out the views of the Planning Authority on the effects of the proposed development on the environment and the proper and sustainable development of the area. The report is also required to address all the issues identified in the (former) An Bord Pleanála “*Guidelines for Planning Authorities*” in respect of Strategic Infrastructure. Accordingly, all the relevant issues to the proposed development have been identified and are assessed below in the report.

Section 37E (5) of the 2000 Act requires that before this report is submitted to the Coimisiún, the Chief Executive shall submit it to the elected members, in order to seek their views on the proposed development. The members may, by resolution, decide to attach recommendations to the report (Section 37E (6) of the Act refers).



Section 37E (6) of the 2000 Act also provides that the views expressed by the members on the proposed development during the Council meeting, can also be attached to this report i.e. the 'meetings administrator's record'.

This report was presented to the Elected Members at the Council Meeting on the 11th May 2026. The recommendations of the Elected Members are attached as **Appendix 1**.

SITE LOCATION & DEVELOPMENT DESCRIPTION OVERVIEW

Site location

The wind farm site is located in a rural area, approximately 2.5km south east of the settlement of Hollyford and 4.78km north west of the settlement of Dundrum.

The proposal also includes for the proposed grid connection from the proposed 110kV substation in the townland of Moheragh to the existing Killonan 110kV substation in the townland of Milltown, Co. Limerick. The cabling route is 37.6km in length and it utilises the local, regional and primary national road network and off-road private lands.

The proposed development traverses the townlands of of Carrow, Moheragh, Carrowkeale, Glenpaudeen, Scarrough, Camus, Ballynahinch, Kilshenane, Dundrum, Gortarush Lower, Ballybrack, Ballysheeda, Shanaknock, Rahyvira, Newtown North, Glassdrum, Greenfield, Cappagh, Philipston, Knockane, Kilbeg, Moher East, Shanacloon, Toem, Moher West, Cahernahallia, Gortaderry, Co. Tipperary.

Part of the application site boundary is located within Co. Limerick (grid connection) for the in the townlands of Toomaline Lower, Toomaline Upper, Doon South, Lisgaugh, Cooga Upper, Kilmoylan Lower, Cooga Lower, Darkisland, Ballycoshown, Gortavalla North, Knocknacarriga, Gortnascarry, Cappamore, Portnard, Turagh, Dromsallagh, Dromcluher, Eyon, Brittas, Gorteennaskagh, Killinure, Bohergar, Sandylane, Boher, Cloghnadromin, Lismullane, Kishyquirk, Clooncunna South, Clooncunna North, Ahabeg, Cunnihee, Whitehall, Coolyhenan, Milltown and Killonan, Co. Limerick.

The Proposed Wind Farm site, which has a total area of approximately 830ha is located in an upland setting and is dominated by forestry plantations along with agricultural pastoral land, mixed forest and woodland-shrub. Apart from three turbine locations (T1, T5 and T9), all other proposed turbine locations are situated in coniferous forestry.



The site is situated on southern foothills of the Mauherslieve Mountains. Ground elevations within the site range from 376m OD on the north to approximately 163m OD on the south. Slopes range from moderate to steep.

The current land use on the wind farm site comprises of agricultural pasture lands, commercial forest, mixed forest and wood land. The land use along the grid connection route comprise of public road corridor, agricultural and commercial forestry.

The site is accessible via a network of local public roads, forestry tracks and farm tracks. The Turbine Delivery Route runs from the M8 Junction 8 Motorway to the Wind Farm Site via the national, regional and local road network.

Table 3-1 of the Planning Report sets out the townlands within the proposed planning application red line boundary and what elements of the proposal is located in each townland.

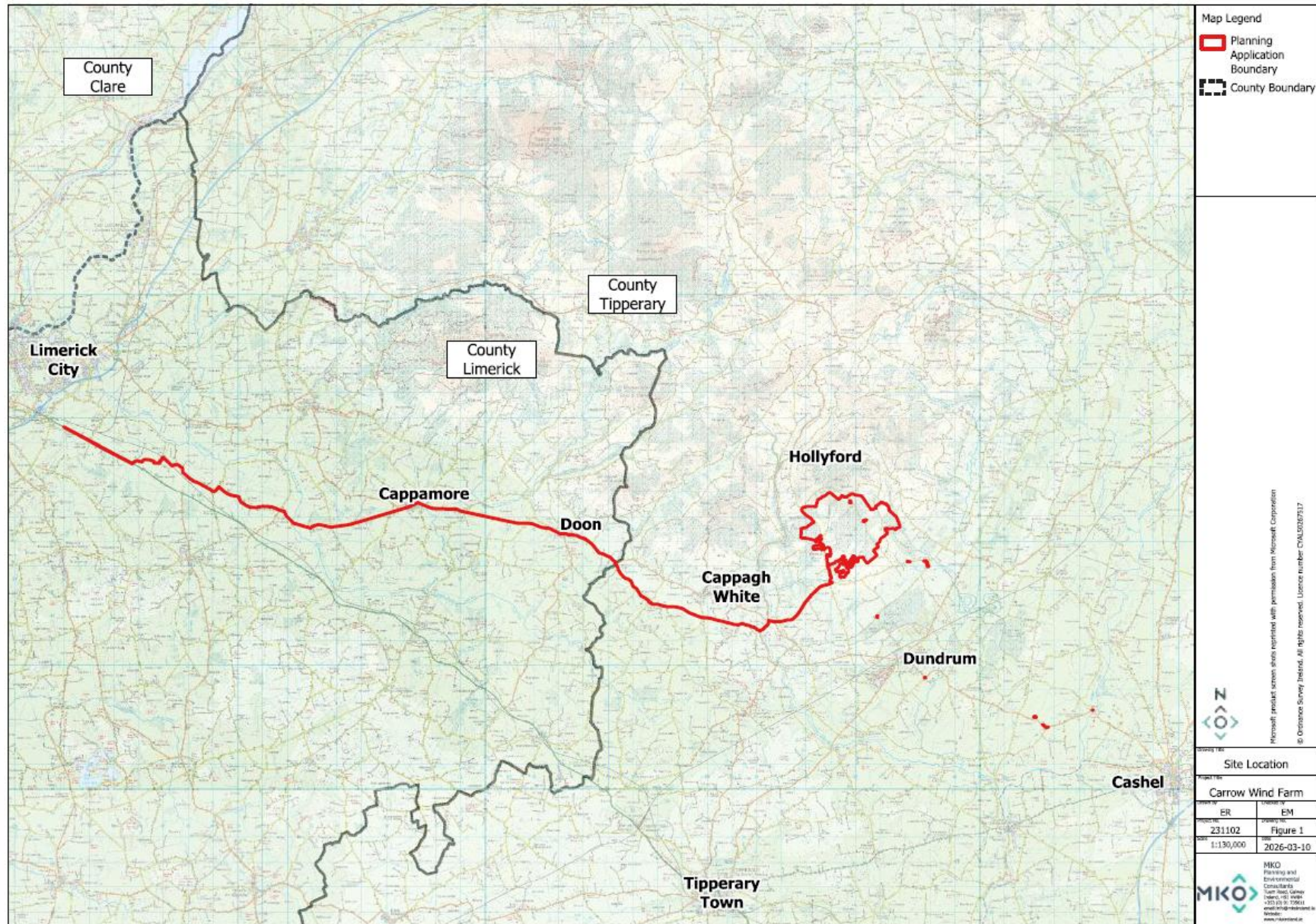


Figure 1 Site location

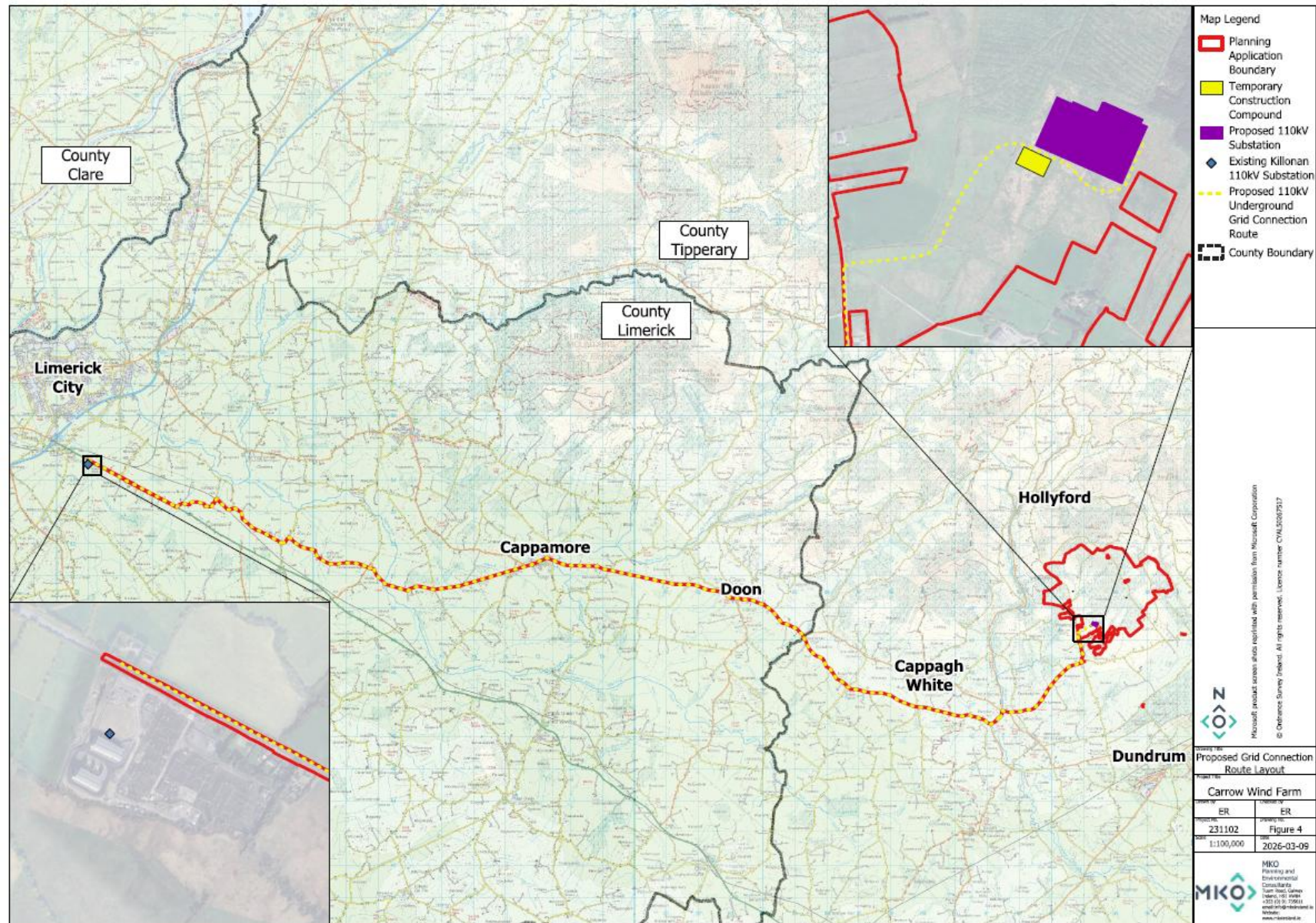


Figure 2 Grid Connection Route



Proposed Development

The Development Description (as per the public notices) is set out hereunder:

The proposed development will consist of the provision of the following:

- i The construction of 14 no. wind turbines with an overall turbine tip height of 185 metres; a rotor blade diameter of 163 metres; and hub height of 103.5 metres, and associated foundations and hard standing areas;
- ii A permanent 110kV substation compound (2 no. control buildings with welfare facilities, all associated electrical plant and equipment, security fencing, entrance on to existing track, all associated underground cabling, wastewater holding tank, site drainage and all ancillary works;
- iii Underground internal wind farm electrical cabling and communications cabling connecting the wind turbines to the proposed on-site 110kV electrical substation and associated ancillary works;
- iv A meteorological mast of 103.5m in height, and associated foundation and hard-standing area;
- v All works associated with the upgrade of the existing agricultural access off the L1154 local road (including the installation of fencing and steel gates) to serve as the main site entrance for the wind farm;
- vi The provision of 4 no. new access/egress points along the L1154;
- vii The provision of 4 no. new access/egress points along the L-5117;
- viii The provision of 5 no. new access/egress point along the L-5206;
- ix The provision of 2 no. new access/egress points along the L-52061;
- x Upgrade of existing tracks/ roads and junctions and provision of new site access roads and junctions;
- xi 3 no. temporary construction compounds with temporary offices and staff welfare facilities;
- xii Accommodation works along the public road network in the townlands of Camus, Ballynahinch, Kilshenane, Dundrum, Gortarush Lower, Carrow, Scarrough, and Moheragh, Co. Tipperary to facilitate the delivery of turbine components and other abnormal loads;
- xiii 2 no. Borrow Pits;
- xiv Spoil Management;
- xv Site Drainage;
- xvi Tree Felling and hedgerow removal;
- xvii Biodiversity Management and Enhancement Measures;
- xviii Operational stage site signage;
- xix Battery Energy Storage System and all associated electrical plant and equipment, security fencing, 2 no. static water storage tanks and a firewater retention tank, and all associated infrastructure and apparatus;
- xx The provision of underground electrical (110kV) and communications cabling from the proposed on-site 110kV electrical substation to the existing Killonan 110kV electrical substation to facilitate the connection to the national grid (RPS S018);
- xxi Provision of 58 no. joint bays, communication chambers and earth sheath links along the proposed underground electrical cabling route;
- xxii Reinstatement of land, road and track surface above the proposed cabling trench; and
- xxiii All related site works and ancillary development considered necessary to facilitate the proposed development, including landscaping and the reinstatement of land.



A 10-year permission and an operational period of 35 years from the date of commissioning of the proposed development is being sought with subsequent decommissioning.

An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) have been prepared in respect of the proposed development and accompany this planning application.

Section 4 of the Planning Report and Chapter 4 of the EIAR includes a full description of the Proposed Development.



POLICY CONTEXT & GUIDANCE

EU Directives and Policies

EU Renewable Energy Directive 2009/28/EC

This directive promotes the use of energy from renewable resource and sets targets for each EU member state that are to be achieved by 2020. Ireland has legally binding targets to meet 16 % of its energy consumption by 2020 from renewable sources. It sets a target of 20% of EU energy consumption from renewable sources by 2020 and a 20% cut in greenhouse gas emissions by 2020. The Directive also outlines methods by which member states can coordinate their activities/policies on achieving targets.

Revised Renewable Energy Directive II (2018/2001/EU)

This directive is an extension of the RED for the periods 2021 to 2030 and it introduced mandatory criteria for solid and gaseous biomass.

European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. No. 274 of 2025)

On 6th August 2025, the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. No. 274 of 2025) were adopted for the purpose of giving effect to Articles 15e(5), 16, 16b, 16c(2), 16d, 16e and 16f of the RED III Directive.

The legislation introduces new decision timelines based on a “completeness check” (ss.34E, 37JB, 295B): 52 weeks for new wind farms, 30 weeks for repowering projects, and one to two years for IROPI cases (two years for projects over 150 kW, one year for projects under 150 kW or repowering). Importantly, renewable energy developments, including related grid and storage infrastructure, are now presumed to be in the overriding public interest.

European 2020 Strategy for Growth

Europe 2020 is the EU’s ten year growth strategy which identifies five headline targets.

One of these targets is Climate Change and Energy Sustainability:

A reduction in greenhouse gas emissions of 20% (or even 30%, if conditions are right);



- 20% of energy from renewables;
- 20% increase in energy efficiency.

Ireland's mandatory national target is to supply 16% of its overall energy needs from renewable sources by 2020.

2030 Climate and Energy Framework

In October 2014 EU leaders adopted the 2030 Climate and Energy Framework (European Commission 2014) which was subsequently updated in 2018. The framework provides a long-term perspective beyond 2020 targets. The 2030 Climate and Energy Framework sets out three key targets for the year 2030:

- At least 40% cuts in greenhouse gas emissions (from 1990 levels);
- At least 32% share of renewable energy;
- At least 32.5% improvement in energy efficiency.

In 2016 the European Commission published its 2030 emissions targets break down for each state. Ireland is to reduce its emissions by 30% relative to its 2005 emissions.

Energy Roadmap 2050

Energy 2050 roadmap sets out a number of different scenarios for developing a decarbonised energy sector over the coming decades. It is clear under all of these scenarios that, subject to agreement between the Member States, there will be a significant increase required in renewable energy deployment in Europe well over and above the 2020 target levels.

European Green Deal

The European Green Deal is a growth strategy for the EU. The EU aim to become climate neutral by 2050.

National Policy

Climate Action and Low Carbon Development (Amendment) Act 2021

Climate Action and Low Carbon Development (Amendment) Act 2021 commits Ireland to a legally binding target of net-zero greenhouse gas emissions no later than 2050, and a reduction of 51% by 2030. These targets are a key pillar of the Programme for



Government and the Government Ministers will be responsible for achieving these targets for their own sectoral area.

The Climate Action Plan originally published in 2019 and subsequently revised in 2021, 2023, 2024 and 2025

Climate Action Plan 2023

The Climate Action Plan 2023 provides a detailed plan for taking decisive action to achieve a 51% reduction in overall greenhouse gas emissions by 2030 and setting the country on a path to reach net-zero emissions by no later than 2050, as committed to in the Programme for Government and set out in the Climate Act 2021.

It is intended to put Ireland on a more sustainable path; cut emissions; create a cleaner, greener economy and society; and protect from the devastating consequences of climate change. It is considered a huge opportunity to create new jobs and grow businesses in areas like offshore wind; cutting-edge agriculture; and retrofitting, making our homes warmer and safer.

Climate Action Plan 2024

The Climate Action Plan 2024 (CAP24) is the third annual update to Ireland's Climate Action Plan. The Plan was approved by Government on 20 December 2023, subject to Strategic Environmental Assessment and Appropriate Assessment.

CAP24 reiterates the European Green Deal commitment to delivering net-zero GHG emissions at EU level by 2050; with Ireland committed to achieving a 51% reduction in emissions from 2021 to 2030, and to achieving net-zero emissions no later than 2050 and the need for action to reduce emissions to be significantly accelerated in the period to 2030.

Climate Action Plan 2025

The National Climate Action Plan 2025 (CAP 2025) was launched in April 2025. CAP 2025 marks the fourth update to the Climate Action Plan 2019, and the third to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021, and the introduction of the 2022 Sectoral Emissions Ceilings (SEC) and the establishment of economy-wide carbon budgets.



CAP 2025 seeks to build on the progress made under Climate Action Plan 2024 by delivering policies, measurements and actions that will support the achievement of Ireland's carbon budgets, sectoral emission ceilings, and 2030 and 2050 climate targets; while further enabling the closure of identified emissions gaps and the allocation of unallocated emission savings associated with each carbon budget period.

Project Ireland 2040: The National Planning Framework 2018

The National Planning Framework is a planning framework to guide development and investment over the coming years. It sets out key goals and objectives for the state. One of the themes is the transition to a low carbon energy future.

Project Ireland 2040: The National Planning Framework: First Revision April 2025

The National Planning Framework underwent its first revision which was published in April 2025.

National Policy Objective 55 To support, the progressive development of Ireland's offshore renewable energy potential, the sustainable development of enabling onshore and off-shore infrastructure including domestic and international grid connectivity enhancements, non-grid transmission infrastructure, as well as port infrastructure for the marshalling and assembly of wind turbine components and for the operation and maintenance of offshore renewable energy projects.

National Policy Objective 69 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 as expressed in the most recently adopted carbon budgets.

National Policy Objective 70 Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050.

National Policy Objective 71 Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.



National Policy Objective 75 Local Authorities shall plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant Regional Spatial and Economic Strategy, through their City and County Development Plans.

Section 28 Ministerial Guidelines

Wind Energy Development Guidelines 2006

Published the Wind Energy Development Guidelines (the Guidelines (DoEHLG, 2006)) under Section 28 of the Act. The aim of the Guidelines (DoEHLG, 2006) was to assist the proper planning of wind power projects.

Draft Wind Energy Development Guidelines 2019

The Department of Housing, Planning and Local Government (DoHPLG) published the draft Revised Wind Energy Development Guidelines (the Draft Guidelines (DoHPLG, 2019)) in December 2019. A consultation process in relation to the Draft Guidelines concluded on the 19th February 2020. A further review of the Draft Guidelines is currently underway by the Department of Housing, Local Government and Heritage (DoHLGH) and the Department of Environment, Climate and Communications (DoECC).

Regional Level

Southern Regional Spatial and Economic Strategy (RSES)

The Regional Spatial and Economic Strategy sets out a strategy to implement the NPF in the Southern Region.

The most relevant objectives of the Strategy are:

PRO 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.



County Development Plan

Tipperary County Development Plan 2022-2028

Tipperary County Development Plan 2022-2028

Volume 1 Written Statement

Section 2.6	Strategic Objective SO-1 To support the just transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy. Strategic Objective SO-2 To promote, support and enable sustainable and diverse economic development, and foster new and innovative opportunities, harnessing the talent of our workforce and communities. Strategic Objective SO-3 To support a sustainable, diverse and resilient rural economy, whilst integrating the sustainable management of land and natural resources.
3 - 1	Promote and facilitate renewable energy development, in accordance with the policies and objectives of the Tipperary Renewable Energy Strategy 2016 (and any review thereof), and the Tipperary Climate Adaptation Strategy 2019.
10 - 1	Support and facilitate new development that will produce energy from local renewable sources such as hydro, bioenergy, wind, solar, geothermal and landfill gas, subject to compliance with normal planning and environmental criteria, in co-operation with statutory and other energy providers.
10 - 5	Support and facilitate the co-location of renewable energy development and technologies to ensure the most efficient use of land identified as suitable for renewable energy generation. <u>Section 10.2.2.</u> Review of the Wind Energy Guidelines: The National Wind Energy Development Guidelines (DEHLG, 2006) are currently under review. The review focuses on several areas including new mechanisms for local community engagement with consideration to investment/benefit, setback from turbines and noise limits. The Council will seek to apply the Wind Energy Development Guidelines, and any review thereof, in assessing proposals for wind energy developments. <u>Section 10.4.1</u> Renewable Energy Targets: In line with the Core Strategy, and the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (DHPCLG, 2017) the Council has considered how the implementation of the Plan to 2028 will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production.

Table 10.1 Renewable Energy Targets for County Development Plan period

Resource	Approved/Operational (MW)	2028 target-approx. 25% increase over permitted capacity
Wind	475 Operational	600MW Operational
Solar	117 Permitted	150MW Operational



Objective 10- A Support the Climate Action Plan (DECC, 2019) as it relates to renewable energy production, having consideration to the strategic importance and potential benefits of renewable energy investment to rural communities.

Objective 10- C To continue to support renewable energy development and to maintain a positive framework for development through the review of the Renewable Energy Strategy over the lifetime of the Plan.

- 11 - 1** In assessing proposals for new development to balance the need for new development with the protection and enhancement of the natural environment and human health. In line with the provisions of Article 6(3) and Article 6 (4) of the Habitats Directive, no plans, programmes, etc. or projects giving rise to significant cumulative, direct, indirect or secondary impacts on European sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans, programmes, etc. or projects).
- 11 - 2** Ensure the protection, integrity and conservation of European Sites and Annex I and II species listed in EU Directives. Where it is determined that a development may individually, or cumulatively, impact on the integrity of European sites, the Council will require planning applications to be accompanied by a NIS in accordance with the Habitats Directive and transposing Regulations, 'Appropriate Assessment of Plans and Projects, Guidelines for Planning Authorities', (DEHLG 2009) or any amendment thereof and relevant Environmental Protection Agency (EPA) and European Commission guidance documents.
- 11 - 3** Ensure the conservation and protection of existing, and proposed NHAs, and to ensure that proposed developments within or in close proximity to an existing or proposed NHA would not have a significant adverse impact on the status of the site as described.
- 11 - 4**
 - (a) Conserve, protect and enhance areas of local biodiversity value, habitats, ecosystems and ecological corridors, in both urban and rural areas, including rivers, lakes, streams and ponds, peatland and other wetland habitats, woodlands, hedgerows, tree lines, veteran trees, natural and semi-natural grasslands in accordance with the objectives of the National Biodiversity Plan (DCHG 2017) and any review thereof.
 - (b) Safeguard, enhance and protect water bodies (rivers/canals/lakes) and river walks and to provide links, where possible, to wider green infrastructure networks as an essential part of the design process.
 - (c) Require an 'Ecosystems Services' approach for new development to incorporate nature-based solutions to SUDS, in so far as practical, as part of water management systems, public realm design and landscaping, in line with best practice.
 - (d) Where trees or hedgerows are of particular local value, the Council may seek their retention, or where retention is not feasible, their replacement and will seek a proactive focus on new tree-planting as part of new development
- 11 - 7** (a) Ensure the protection of water quality in accordance with the EU WFD and support the objectives and facilitate the implementation of the associated Programme of



Measures of the River Basin Management Plan 2018-2021 and any successor. This includes contributing towards the protection of Blue-Dot catchments and drinking water resources. Also, have cognisance of the EU's Common Implementation Strategy Guidance Document No. 20 and 36 which provide guidance on exemptions to the environmental objectives of the WFD.

- (b) Support an integrated and collaborative approach to catchment management in accordance with the River Basin Management Plan 2018-2021 and any successor.
- (c) Require an undisturbed edge or buffer zone to be maintained, where appropriate, between new developments and riparian zones of water bodies to maintain the natural function of existing ecosystems associated with water courses and their riparian zones, and to enable sustainable public access.

- 11 - 9** (a) Require the submission of site-specific Flood Risk Assessments for developments undertaken within Flood Zones A & B and on lands subject to the mid-range future scenario floods extents, as published by the OPW. These Flood Risk Assessments shall consider climate change impacts and adaptation measures including details of structural and non-structural flood risk management measures, such as those relating to floor levels, internal layout, flood-resistant construction, flood-resilient construction, emergency response planning and access and egress during flood events.
- (b) SFRAs and site-specific flood risk assessments shall provide information on the implications of climate change with regard to flood risk in relevant locations. The 2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management (or any superseding document) shall be consulted with to this effect.
- (c) Ensure each flood risk management activity is examined to determine actions required to embed and provide for effective climate change adaptation as set out in the OPW Climate Change Sectoral Adaptation Plan for Flood Risk Management applicable at the time.
- (d) Applications for development on land identified as 'benefitting land' may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas.
- (e) Require applications for new development, or for an extension to an existing development on land zoned for 'Social and Public' or 'Amenity' use and where a potential flood risk is identified, and where the proposed use might be vulnerable, to be subject to site-specific flood risk assessment to the satisfaction of the Council.
- 11 - 12** In assessing proposals for new development to seek to protect, support and conserve the geological heritage sites of Tipperary and their value as outlined in the Tipperary Audit of Geological Heritage Sites, (GSI/TCC, 2019).
- 11 - 16** Facilitate new development which integrates and respects the character, sensitivity and value of the landscape in accordance with the designations of the Landscape Character Assessment, and the schedule of Views and Scenic Routes (or any review thereof). Developments which would have a significant adverse material impact on visual amenities will not be supported.
- 11 - 18** Ensure that new development does not result in significant noise disturbance and to ensure that all new developments are designed and constructed to minimise noise disturbance in accordance with the provisions of the Noise Action Plan 2018 and relevant standards and guidance that refer to noise management.



11 – 19 Ensure that new development does not result in significant disturbance as a result of light pollution and to ensure that all new developments are designed and constructed to minimise the impact of light pollution on the visual, environmental and residential amenities of surrounding area

13 - 4 Safeguard sites, features and objects of archaeological interest, including Recorded Monuments, National Monuments and Monuments on the Register of Historic Monuments, and archaeological remains found within Zones of Archaeological Potential located in historic towns and other urban and rural areas. In safeguarding such features of archaeological interest, the Council will seek to secure their preservation (i.e. in situ or in exceptional circumstances preservation by record) and will have regard to the advice and recommendation of the Department of Arts, Heritage and the Gaeltacht.

Where developments, due to their location, size or nature, may have implications for archaeological heritage, the Council may require an archaeological assessment to be carried out. This may include for a requirement for a detailed Visual Impact Assessment of the proposal and how it will impact on the character or setting of adjoining archaeological features. Such developments include those that are located at, or close to an archaeological monument or site, those that are extensive in terms of area (1/2 ha or more) or length (1 kilometer or more), those that may impact on the underwater environment and developments requiring EIA.

15 - 7 Require all new development to provide a separate foul and surface water management system and to incorporate nature-based water sensitive urban design, where appropriate, in new development and the public realm. New developments, or retrofit/upgrading works, including those contributing to combined drainage systems where streetscape enhancement programmes or resurfacing programmes are planned, will incorporate measures to reduce the generation of storm water run-off, and to ensure that all storm water generated is managed on-site, or is attenuated and treated prior to discharge to an approved storm water system, with consideration to the following:

- (a) Nature-Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas (water sensitive urban design) Best Practice Interim Guidance Document (DHLGH, 2001) and any review thereof,
- (b) The infiltration into the ground through the development of porous pavement such as permeable paving, swales and detention basis,
- (c) The holding of water in storage areas through the construction of green roofs, rainwater harvesting, detention basis, ponds and wetlands etc.
- (d) The slow-down in the movement of water.

Volume 3 Appendix 6 Development Management Standards

1.0 Habitats Directive Assessment

Habitats Directive Assessment (HDA), also known as Appropriate Assessment (AA), is a requirement under the Habitats Directive 92/43/EEC. Plans and projects which have potential to impact on Natura 2000 designated sites must be screened for AA, and a full AA must be carried out, unless it can be established through screening that the plan or project in question will not have a significant effect on any Natura 2000 Site(s).



The planning authority will require, as appropriate, AA to be prepared in accordance with Article 6(3) and Article 6(4) of the Habitats Directive, and in accordance with the 'Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities' (DEHLG, 2009) and relevant EPA and European Commission guidance documents. AA shall be carried out in respect of any plan or project likely to have a significant effect on a European site(s), either individually or in combination with other plans or projects, in view of the site's conservation objectives.¹

1.2 Environment Assessment

The Environmental Impact Assessment Directive (Directive 2011/92/ EU as amended by 2014/52/EU on the assessment of the effects of certain public and private projects on the environment) requires an assessment of the environmental impact of certain projects. An Environmental Impact Assessment Report (EIAR) is required to accompany a planning application for development of a class set out in Schedule 5 of the Planning and Development Regulations 2001 (as amended) (the Regulations) which exceeds a limit, quantity or threshold set for that class of development. Environmental Impact Assessment (EIA) is the process by which the anticipated effects on the environment of a proposed development or project are measured, and if the likely effects are unacceptable, design measures or other steps can be taken to avoid, reduce or mitigate against those effects.

An EIA may be required for development proposals below statutory thresholds outlined in the Regulations. If the proposed development is sub-threshold, and the planning authority considers that the proposal is likely to have significant effects on the environment, then an EIA must be submitted to the planning authority. The planning authority will have regard to Schedule 7 of the Regulations, and the associated 'Guidelines for Planning Authorities, and An Bord Pleanála on carrying out EIA' (DHPLG, 2018), in deciding whether a proposed development is likely to have significant effects on the environment along with 'Environmental Impact Assessment Guidance for Consent Authorities' (DEHLG, 2003) (and any amendment thereof) regarding sub threshold development. Prospective developers are advised to have regard to the supporting 'Guidelines on the Information to be contained in EIAs', (EPA, 2002) (and any amendment thereof) for further details on schedule six of the Regulations.

3.6 Noise

The Council may require new commercial and industrial developments to submit a Noise Impact Assessment and appropriate mitigation measures as part of their planning application. This provision will apply to the following:

- a) For new developments that are likely to generate noise nuisance or an unacceptable impact on sensitive receptors;
 - b) For new developments proposed within the current Action Planning Area as set out in the Tipperary County Council Noise Action Plan, 2018;
- or
- c) For developments proposed near major roads (i.e. traffic volumes in excess of 3 million vehicles per annum or otherwise on a case by case basis). Where developments are planned adjacent to major roads, the planning application shall incorporate acoustical planning into the development design e.g. designing the development so that the access road is adjacent to the major road noise source (subject to an analysis of the potential traffic safety implications). It may also involve the use of buffer zones and/or noise barriers and traffic calming measures.



6.1 Road Design & Visibility at a Direct Access

A direct access is a vehicular access from any residential, commercial or agricultural property to and from a public road. New direct accesses shall not be permitted within 90m of the exit of a roundabout on a national road, or within 50m of the exit on a non-national road.

Any direct access to a rural national primary or rural national secondary road shall comply with the visibility parameters contained in Section 5.6.3 of TII Publication DN-GEO-03060, Geometric Design of Junctions, which is available for download from the TII Publications website (<https://www.tiipublications.ie/>).

Any direct access to an urban national primary or national secondary road shall comply with the visibility parameters contained in Section 4.4.5 of the Design Manual for Urban Roads published by the Department of Transport, Tourism and Sport, which is available for download from the following website (<https://www.gov.ie/en/publication/3360b1-design-manual-for-urban-roads-and-streets/>).

On all national and non-national roads, the full 'Y – Distance' shall be to an object height of 1.05m above the road surface level measured at the near edge of the travelling lane (the yellow line, or if none exists, the edge of the paved surface). Forward visibility equal to the Y-Distance shall also be provided along the public road on the approaches from each side of an access.

The distance back along the minor road or direct access from which the full visibility is measured is known as the 'X-Distance'. It is measured back along the centreline of the minor road or direct access from the continuation of the line of the nearside edge of the paved surface (including hardstrip or hard shoulder) of the major road. The 'X-Distance' on the minor road for visibility measurements shall be as defined in Table 6.1 below.

Table 6.1: X-Distance Requirements

Major Road Use	Minor Road use/Direct Access	X-Distance
National Roads	Simple Junctions, Stop control	2.4m
Regional & Local Roads	All junctions and accesses, Stop control	2.4m
Regional & Local Roads	All junctions and accesses, Yield control	3.0m
National Regional & Local Roads	Multiple residential, Commercial, Agricultural or other	4.5m
Regional & Local Roads	Accesses lightly trafficked (single residence)	2.0m

For direct access to a non-national road, the same principles apply as for national roads. Where posted mandatory speed limits are provided the design speeds and associated Y-Distances in Table 6.2 shall apply:

Table 6.2: Design Speeds and associated Y-Distances

Mandatory Speed Limit	Design Speed (operational Speed)	Rural Non-National Road	Urban Non-National Road
km/h	km/h	Y-Distance (m)	Y-Distance (m)



30	40	N\A	33
40	50	70	45
50	60	90	59
60	70	120	72
80	85	160	N\A
100	100	215	N\A

On non-national roads, in cases of particular difficulty, the use of a lower design speed for a given mandatory speed limit (as set out in table 6.2) may be accepted by the Council. In such a case, the applicant must demonstrate to the satisfaction of the Council that the 'operational speed' of the road is less than the specified design speed. In such cases, the Council may accept the use of the lower speed than identified in column 2 of Table 6.2 above.

6.1.1 Measuring 'Operational' Speed

The operational speed shall be determined by measurement of actual speeds between 07:00 am and 07:00 pm over a period of three days, excluding weekends or public holidays. It represents the 85th percentile speed of the traffic travelling on that section of road during that period. The 85th percentile speed is the speed at or below which 85% of the traffic is travelling.

As an alternative, the applicant may use the methodology described in Section 10.2 of TII publication DN GEO 03031: Rural Road Link Design to determine a design speed based on the physical characteristics of the road section.

The minimum design or operating speed that will be allowable under any circumstances for a rural non-national road shall be 50kph, and for an urban non-national road it shall be 40kph. The Council's decision on the appropriate design or operating speed shall be final.

Tipperary Renewable Energy Strategy (Appendix 2 Volume 3 of TCDP 2022-2028)

- **TWIND 4:** Policy Areas for Wind Energy Development: Areas 'Open for Consideration' – wind energy development in these areas may or may not be appropriate, depending on the character of the landscape and the potential impact of the proposed development. Any impact on the environment must be low and subject to proper planning and sustainable development, and the guidelines set out in this policy document.
- **Policy RE1:** Protection of the Environment: It is the policy of the Council that renewable energy developments and associated supporting infrastructure shall be assessed for compliance with the environmental standards and policies as set out in the County Development Plan (as varied) and the Development Management standards set out in Chapter 10.
- **Policy RE2:** Landscape Capacity and Renewable Energy Development: It is the policy of the Council to facilitate new development which integrates with and respects the character, sensitivity and value of the landscape in accordance with the



guidelines set out in the Tipperary Landscape Character Assessment 2016 and the policies as set out in the County Development Plan (as varied) and the Development Management standards set out in Chapter 10.

Areas Open for Consideration	
TWIND 4.1	Proposals shall demonstrate conformity with existing and approved wind farms to avoid visual clutter. In this respect, developers should consider the cumulative impact of new development in the context of the location of both existing and permitted developments.
TWIND 4.2	Proposals in Areas 'Open for Consideration' shall be sited having consideration to the landscape sensitivity and capacity analysis set out in the Tipperary Landscape Character Assessment 2016 and the provisions of the County Development Plan (as varied) in relation to landscape (Chapter 7). All applications shall have regard to the visual impact of turbines and ancillary development (such as access roads, boundary fencing, control buildings and grid connections).
TWIND 4.3	Within Areas 'Open for Consideration', proposed development within areas which already accommodate turbines, sub-stations and powerlines shall be considered appropriate from a sequential approach to the development of infrastructure, until these areas reach capacity.
TWIND 4.4	All Projects are required to be screened for Appropriate Assessment Screening in accordance with Article 6(3) of the Habitats Directive and the provisions of the County Development Plan (as varied).
TWIND 4.5	Applications for wind development shall be accompanied by a technical assessment in relation to the slope stability, landslide susceptibility of the development site and the proposed project. This assessment shall incorporate slope stability mapping and groundcover assessment in the context of potential cumulative effects arising from multiple developments.
TWIND 4.6	All proposals for wind energy development will have regard to the cumulative effect of the development on the environment when considered in conjunction with other existing and permitted wind energy developments in the area.
TWIND 4.7	All applications will have regard to the impact on existing built environment, particularly neighbouring residential properties and other sensitive amenity areas.

Areas Open for Consideration	
TWIND 4.8	All applications will have regard to the impact of any proposal for wind energy development on surrounding tourism and recreational related activities and the compatibility of same will be carefully considered in the assessment of any planning application.
TWIND 4.9	All applications will have regard to the impact of any proposal for wind energy development in the context of any flood risk in the area. A comprehensive flood risk assessment for proposals in an area at risk of flooding, adjoining same or where cumulative impacts may result in a flood risk elsewhere, in low lying areas or in areas adjacent to streams.
TWIND 4.10	All applications will ensure that details of the proposed grid connection and all associated infrastructure are considered in the Environmental Impact Statement (EIA) and Natura Impact Statement as may be required.
TWIND 4.11	All applications will have regard to the impact on rivers and streams and will demonstrate compliance with the Water Framework Directive.
TWIND 4.12	Wind energy development proposed in areas of lowland raised bog/peatland shall ensure that negative impacts including habitat disturbance and loss, and avoidance of hydrological disruption and risk of erosion are avoided or mitigated through design. Site specific geo-technical investigations shall be submitted as part of EIA unless otherwise agreed with the council.



Local Authority Climate Action Plan 2024

- **Strategic Goal 4** Through our spatial planning policy and objectives support the Core Strategy of the Tipperary County Development Plan (and any review thereof), having consideration to core objectives as they relate to sustainable development and a Just Transition, including aspects such as Town Centre First, Active Travel, Sustainable Energy and Compact Development etc
- **Strategic Goal 5** Promote and protect our environment, and its biodiversity and water catchments as key enablers of climate adaptation and mitigation across the county through the delivery of sustainable services, including those with a focus on nature-based solutions, in collaboration with sectors and communities.

PLANNING HISTORY

Existing and current planning applications on site

The relevant planning history on the subject site is summarised below. All the planning applications (within 10 years) that fall within the application site boundary are outlined in Section 2.6.1 of Chapter 2 of the EIAR and in Table 3-2 of the Planning Report.

Table 1 Planning History

Planning Reference	Description	Decision
ABP 92.248010 (15601088)	To erect 2 no. Wind turbines overall height of up to 150 meters, crane hardstands, access roads, electrical cabling, electrical control building, borrow pit, ancillary drainage system and ancillary site works. The application will be accompanied by an appropriate assessment (stage 2 screening) and an environmental report. The application is for a 10 year permission, under section 41 of the planning and development act 2000	Refused permission by Tipperary County Council on 19/01/2017 and ABP by order dated 8 January 2018 for reason that the site was located in an area identified as being unsuitable for wind energy



16600919	Construction of a forestry entrance and associated site development works to service my lands	Granted permission by Tipperary County Council on 13/01/2017
11228	Demolish existing cottage and erect in its place a dormer dwelling with attached garage, a new effluent treatment unit, percolation system and revised entrance	Granted permission by Tipperary County Council on 14/07/2011
021277	A dwelling, site entrance and wastewater treatment works	Granted permission by Tipperary County Council on 03/04/2003

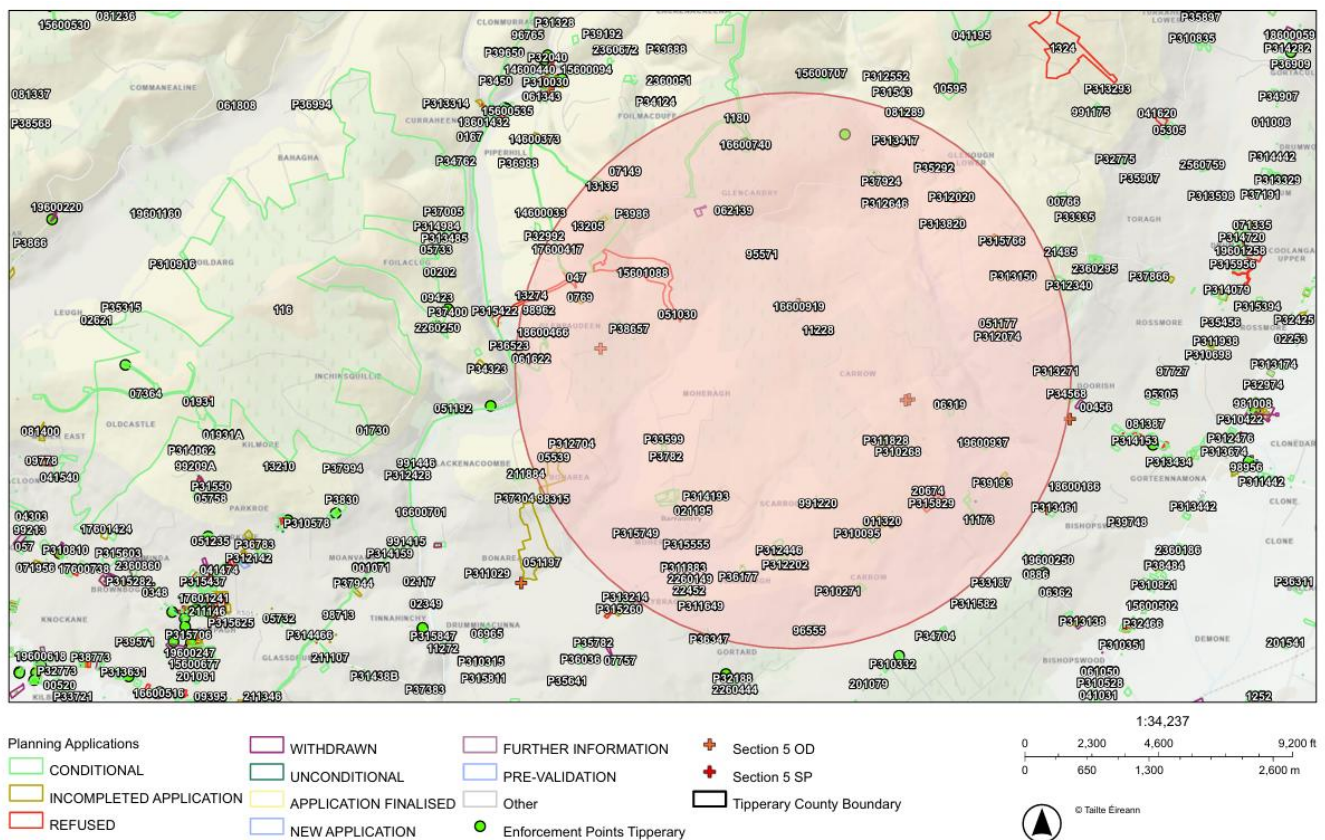


Figure 3 Planning Register with relative to Wind Farm site



Pre-Planning Consultation

Full details of Pre Application Consultation are included at Section 3.4.2 of the accompanying Planning Report.

A copy of the SID Determination is included with the Application. An Coimisiún Pleanála determined in the direction dated 20th March 2026 that the proposed development would exceed the threshold set out in the seventh schedule of the Planning & Development Act 2000 (as amended) and therefore satisfies Section 37A(1) of the Act. It was concluded that the proposed development is of strategic importance and meets the requirements Section 37A(2)(a) and Section 34A(2)(b) of the Act. A copy of the SID determination letter is included at Appendix 2-2 of the EIAR.

INTERNAL DEPARTMENT REPORTS

Introduction

The Strategic Infrastructure Development application referred to the following internal departments within Tipperary County Council.

- Tipperary-Cahir-Cashel Municipal District Engineer
- Environment and Climate Action Section
- Biodiversity Officer

A copy of each of the internal department reports is attached as Appendix 2.

Report of the Municipal District Engineer

Report received 23/04/2026. A summary of the issues raised is set out below;

General Comment

Whilst there is a large amount of documentation the finer site specific details of what is proposed is difficult to identify. Either more detailed drawings are required around proposed layouts or agreements will need to be made with TCC before construction. The preferred scenario is that more detail is provided.

Entrances

The layout detail of the proposed accesses to the public road is not clear from the documents provided. Operational speeds should be provided for any entrance proposed onto a public road. A document should be provided detailing all entrances onto the public road before any proposed entrance layout is agreed with TCC before construction. All existing drainage infrastructure affected by the proposed entrances must be maintained or replaced as necessary and in agreement with TCC.



Accommodation Works

Confirmation required that agreements with all landowners are in place?

Confirmation will need to be sought that any alterations as part of the accommodation works are reinstated in agreement with TCC.

A programme should be provided to identify the timeline for the accommodation works clearly identifying the timeframe for construction, in place and reinstatement.

Drainage

All existing drainage infrastructure must be maintained and replaced if altered.

All surface water should be managed on site and ensure no impact to public or other private infrastructure.

Bridges

A document identifying all bridges, culverts or drains crossed by the final cable route and also the plant delivery route should be provided.

All cables must be directionally drilled under bridge structures or culverts.

If abnormally heavy loads are proposed on delivery routes that traverse a bridge or culvert an Engineering Inspection will need to be carried out by the developer before and after loading. The initial bridge inspection should identify the load carrying capacity of the structure and proposals to repair any defects should be identified in the report.

Any use of the structure should only take place in agreement and coordination with TCC. Any accommodation works to such structures to be agreed with TCC.

Proposed Cables

There are details provided for cables under and over existing pipework/infrastructure.

All proposed cables should only be under existing pipework/infrastructure.

A detailed report to be submitted where the proposed cables share the public road with existing windfarm or solar farm for review by TCC. The report should clearly detail how the road cross section is to be shared between the two providers and interaction with any other road infrastructure.

Road Opening Licence – any excavation in the public road or verge will be subject to condition under the Road Opening Licence system. Typical conditions attached to same outlined and the developer should be made aware of them at planning stage. Compliance with these conditions may require alterations to the proposed layout. Its particularly important to note the elimination of joint bays from the public road in this regard.



Report of the Environment & Climate Action Section

Report received 23/04/2026. The report included observations as follows;

Hydrology and Hydrogeology

Sedimentation and Nutrient run-off

There is a risk to surface waters in the vicinity and downstream of the Proposed Wind Farm site (Aughnaglanny River, Lackenacoombe Stream, Glasheenyreagha Stream and Multeen River) from runoff. Surface waters are the main sensitive receptors associated with the Proposed Project, due to the local hydrological regime which is characterised by relatively high runoff rates and low rates of groundwater recharge. The primary potential contamination downstream surface waters are via elevated concentrations of suspended solids and nutrient enrichment.

A total of 51.6 hectares of forestry will be felled for the Proposed Wind Farm which will result in large areas of exposed soil. The construction phase also includes access road construction, turbine base/hardstanding construction, construction compound construction, met mast construction, substation construction, grid cable route, spoil management areas and borrow pits which will require varying degrees of earthworks.

These activities can result in the release of suspended solids to surface water and could result in an increase in the suspended sediment load, resulting in increased turbidity which in turn could affect the water quality and fish stocks of downstream water bodies.

Watercourse crossings

Along the Proposed Grid Connection cable route there are 35 no. watercourse crossing locations with 23 no. being EPA mapped watercourses. All 35 no. crossings are existing culverts and bridges where works are required to accommodate the Proposed Grid Connection cable within or underneath the crossing structure.

The Proposed Grid Connection cable route intercepts the Lower River Shannon SAC at three locations where it crosses the Cahernahallia River, Bilboa River and Mulkear River via existing road and bridge structures.

At the crossing locations the cable will be placed either underneath or above the culvert by open trench method or by Horizontal Directional Drilling (HDD) method; and, no in-stream are proposed at any existing crossing location.

Land Soils and Geology

The Proposed Wind Farm site setting on the southern foothills of the Mauherslieve Mountains means that topography in the local area is hilly with the Proposed Wind Farm infrastructure spread across several stream valleys that drain southerly within or adjacent to the Proposed Wind Farm site. Ground elevations within the Proposed Wind Farm site range from ~376m OD (metres above Ordnance Datum) on the north to approximately 163m OD on the south. Slopes range from moderate to steep, with the steepest slopes being on the valley sides of the main the streams that drain the Proposed Wind Farm site.

The Multeen River located immediately downstream of the Proposed Project site forms part of the Lower River Suir SAC (002137).



The GSI Landslide database (www.gsi.ie) does not record any historic landslides in the vicinity of the Site or in the surrounding lands. The GSI Landslide Susceptibility Map (www.gsi.ie) classifies the probability of a landslide occurring at a given location. The Proposed Wind Farm site is mapped mainly as having Low Susceptibility with localised areas mapped as Moderately Low and Moderately High to High Susceptibility.

The depth to bedrock at the 18 no. locations ranged between 0m and 3.3m with an average of 1.8m. Trial pits that encountered bedrock were distributed throughout the Proposed Wind Farm site indicating relatively shallow bedrock across the overall Proposed Wind Farm site. At these ground elevations shallow bedrock would be expected and is consistent with GSI mapping (i.e. bedrock outcrop or subcrop). Bedrock was not encountered at the Proposed Grid Connection 110kV substation at a depth of 2.8mbgl.

Mineral subsoils most encountered were SILT, CLAY or SILT/CLAY combinations and typically presented as firm to very firm and sometimes stiff, slightly sandy, slightly gravelly with cobbles and occasionally interbedded with SAND and GRAVEL layers. The subsoils are consistent with the underlying parent material (i.e. sandstone/siltstone bedrock).

Tree removal on steep slopes may result in a short-term increase in susceptibility to shallow slope instability due to loss of root reinforcement and increased soil moisture. However, given the generally shallow depth to bedrock, firm subsoils, absence of recorded landslides, and the implementation of standard forestry and construction best practice, the risk of significant landslide occurrence is considered low and manageable.

Noise and Vibration

371 no. noise sensitive locations have been identified within approximately 3km of the proposed turbines. Nearest NSL is located at a distance of approximately 741m to the nearest proposed turbine.

Recommendation:

- It is recommended that all mitigation measures as specified in Ch 9 Hydrology and Hydrogeology F1 2026.03.24 - 231102 shall be made a condition subject to approval, to ensure all surface water runoff generated within the boundary of this development is treated and attenuated prior to diffuse discharge at pre-existing greenfield runoff rates.
- Adhere to Inland Fisheries Ireland Guidelines on Protection of Fisheries During Construction Works In and Adjacent to Water 2016.
- Prior to commissioning of the wind farm, the developer shall submit a Noise Compliance Monitoring Programme (NCMP) to the planning authority for written agreement. This NCMP shall include a detailed methodology for all noise measurements, the frequency of monitoring and procedures for recording results. The approved NCMP shall be fully implemented throughout the operational phase of the wind farm.
- It is recommended that a noise survey is undertaken at the nearest receptors within six months of commissioning of a wind farm.
- The applicant shall include the provision of a wheel wash during the construction phase to avoid the track out of soil onto public roads.



Report of Biodiversity Officer

Report received 23/04/2026. The report included observations on the following:

Hen Harrier

The conclusion of the Natura Impact Statement that the project site is not of significance to hen harrier is ecologically flawed and is not supported when assessed against NPWS Site-Specific Conservation Objectives for the Slievefelim to Silvermines Mountains SPA. Those objectives require the maintenance of adequate supporting habitat to sustain the species across its range and to facilitate population recovery, not simply the protection of areas currently subject to regular use.

The confirmed presence of meadow pipit on site (as per EIAR Appendix 7-2 Table 1), a core prey species for hen harrier, demonstrates that the site and adjacent areas can provide foraging habitat within the SPA's defined foraging range.

In the context of a red-listed species in severe and ongoing decline, reliance on low encounter rates to discount habitat importance represents a failure to apply a precautionary approach. Absence or low usage is not evidence of low importance it is often evidence of functional habitat loss, or landscape fragmentation.

By dismissing prey-supported habitat and downplaying acknowledged pathways for displacement and collision, the NIS & EIAR underestimate the role of the site in maintaining the ecological functionality, connectivity and resilience of the SPA.

Bats

For bat species identified as having a high risk of collision, such as Leisler's, common and soprano pipistrelles, sufficient consideration of cumulative impacts on bat populations has not been provided, particularly given of the presence of 17 wind farms within a 10km zone.

While the assessment outlines collision risk at the project site, it does not sufficiently evaluate the cumulative and population-level effects potentially arising from exposure of bat populations to multiple turbines across the landscape.

Cumulative Impacts

The EIAR gives limited consideration to cumulative impacts on biodiversity, as its focus is largely limited to the effects of the proposed development in isolation. Although it acknowledges the presence of 17 other wind farms within 10 km, there is little meaningful assessment of how impacts such as disturbance, habitat loss or collision risk may accumulate across the wider landscape over time.



ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR)

Introduction

This part of the report comments on the content of the EIAR included with the application. It is noted that in the introduction to the EIAR, the applicant has provided a statement of authority in relation to the author(s).

Section 172, Part X of the Planning & Development Act 2000, as amended states:

1) An environmental impact assessment shall be carried out by a planning authority or the Board, as the case may be, in respect of an application for consent for—

(a) of a class specified in Schedule 5 to the Planning and Development Regulations 2001 which exceeds a quantity, area or other limit specified in that Schedule, and

(b) of a class specified in Schedule 5 to the Planning and Development Regulations 2001 which does not exceed a quantity, area or other limit specified in that Schedule but which the planning authority or the Board determines would be likely to have significant effects on the environment.

The Proposed Development is considered EIA development as it falls within the following class of Schedule 5, Part 2, Planning and Development Regulations 2001 as amended, and exceeds the threshold stated therein.

Class 3 (i)- Installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts.

The EIAR includes 18 Chapters & Non-Technical Summary (Volume 1), Photomontages (Volume 2 linked to Chapter 14) and Appendices (Volume 3) as follows:

1. Introduction
2. Background to the Proposed Project
3. Considerations of Reasonable Alternatives
4. Description of the Proposed Project
5. Population and Human Health
6. Biodiversity
7. Ornithology
8. Land, Soils and Geology
9. Hydrology and Hydrogeology
10. Air Quality
11. Climate
12. Noise and Vibration



13. Cultural Heritage
14. Landscape and Visual
15. Material Assets (including Traffic and Transport, Telecommunications and Aviation)
16. Major Accidents and Natural Disasters
17. Interactions of the Foregoing
18. Schedule of Mitigation Measures

Observations on the EIAR

Chapter 1 Introduction

The chapter appears clearly set out and gives an overview of the proposed development, site location and introduces the applicant. It also outlines the legislative and policy context of the EIAR and provides a synopsis of its structure. Section 1.5 sets out the “need” for the development. Section 1.8 provides details of the Project Team and outlines their expertise and qualifications. It is highlighted that a “Statement of Authority” is included in each chapter of the EIAR detailing the experts who contributed to the preparation of the report and the parts of the report which he or she is responsible for or to which he or she contributed.

Chapter 2 Background to the Proposed Project

Existing Operations

This chapter sets out the policies and targets which have been put in place at the various levels of Government including international, national, regional and local in relation to planning, renewable energy and climate change which are relevant to the Proposed Project.

It also sets out the need for the Project and how it will directly aid Ireland in meeting its national targets and European commitments in relation to climate change and decarbonisation.

This chapter summarises the EIAR scoping exercise, the pre-planning consultation and community engagement undertaken and the Cumulative Impact Assessment process.

This chapter include for a statement of compliance with relevant national, regional and local polices.



Comments on Chapter 2

The Planning Authority notes the development proposed and considers the information presented in Chapter 2 clearly outlines the background to the application coming forward and which legislative and policies documents support renewable energy and decarbonisation projects. This chapter clearly sets out the background and pre-applications inputs into the preparation of the application.

The application makes reference to the proposed development being located within an area “Open for Consideration” under the Tipperary Renewable Energy Strategy as contained within Appendix 2, Volume 3 of the TCDP 2022-2028.

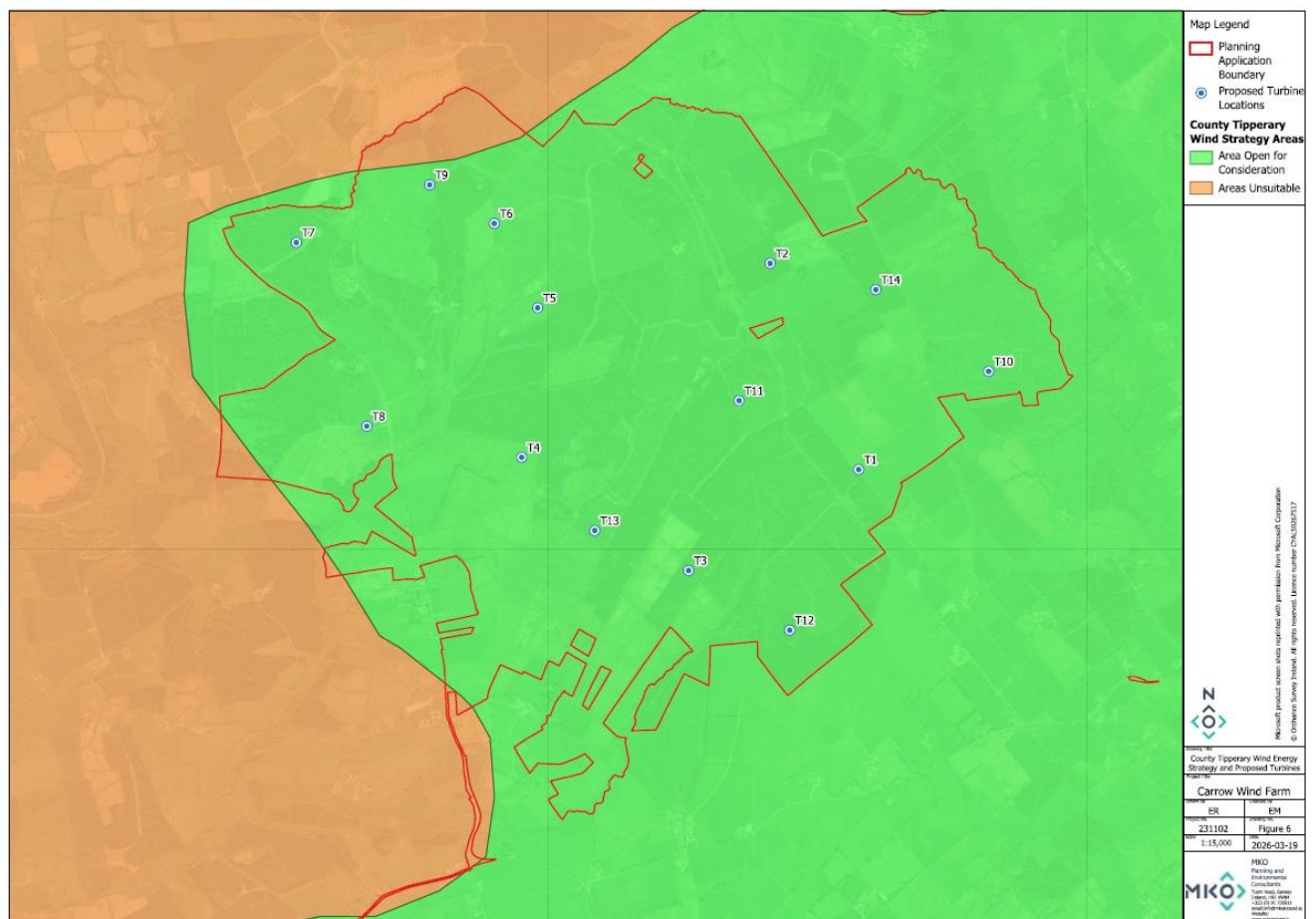


Figure 4 Proposed Site Layout



Chapter 3 Considerations of Reasonable Alternatives

Consideration of alternative

Chapter 3 outlines the legislative requirements for the developer to include a description of reasonable alternatives considered.

This chapter sets out the consideration on alternatives and outlines the screening utilized to identify potentially suitable sites, details of other sites considered in Co. Tipperary and the rationale for site selection and the alternative windfarm designs that were considered. It includes a methodology employed and various alternative of different aspects of the overall project i.e. alternative renewable energy types, locations, sites, protection design (turbine types, numbers and model), roads, alternative borrow pits, haul routes, grid connection route and mitigation measures.

Section 3.2.5 notes that there are 14 no. turbines proposed to have an output of 6.2MW per turbine and will have an estimated installed capacity of 86MW. It further explored the possibility of using smaller turbines (e.g.2.5MW) which has been determined that would require circa 35 turbines which would demand additional infrastructure (e.g.s roads) or potential environmental impacts.

The chapter includes a section examining EU and National designated habitats.

Table 3-4 sets out a comparison of environmental effects when compared to the chosen option examines the effects of different versions of the proposal as it has evolved from the initial design and number of turbines.

3.2.5.7.2 explore the options to connect the proposed windfarm to the 110kV substation which is 4km south of the Site but has been discounted owing to the possible energy capacity this sub-station can absorb. Table 3.6 summaries all the cable route options that were explored and discounted under the relevant headings of the EIAR.

Comments on Chapter 3

Tipperary County Council is broadly satisfied with the approach taken to the question of the assessment of alternatives.

Chapter 4 Description of the Proposed Project

Consideration of Proposed Development

Section 2.2 of this report for a detailed description of the project. Chapter 4 includes an in-depth description of each element of the proposal. The Proposed Development Site Approximately 1,156 Hectares. Permission is being sought for 10 years for a 35-year operation period commencing from the date of full operational commissioning of the Proposed Wind Farm.

The wind turbines that will be installed on the Wind Farm site will be conventional three-blade turbines that have the following dimensions:

- Turbine Tip Height – 185 metres
- Hub Height – 103.5 metres
- Rotor Diameter - 163 metres
- Blade length – 81.5 metres

This section gives a detail description of the foundations required for the turbines, road network, masts, cabling, site boundaries, burrow pits, temporary construction compound, ancillary structures and buildings, Temporary Road accommodation works, tree felling, stone and material requirements, site drainage, construction management, traffic management and decommissioning.

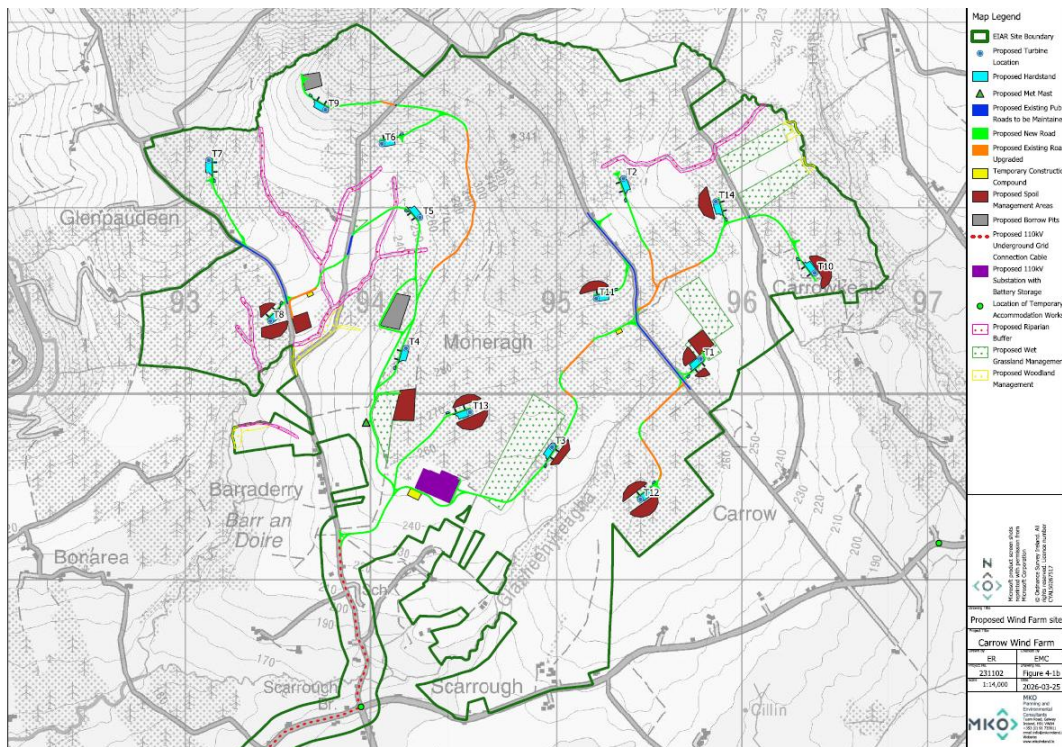


Figure 5 Proposed Wind Farm



Comments on Chapter 4

Tipperary County Country is broadly satisfied with the contents of this chapter which gives a description of each section of the proposed development.



Chapter 5 Population and Human health

Issues considered

Chapter 5 examines the potential effects of the proposed development on Population and Human Health during construction, operations and decommissioning. It examines effects on these under the following headings:

- Employment and Economic Activity
- Population and Settlement Pattern
- Land use patterns and activities.
- Human Health effects on wind farms
- Tourism and Amenities.

This Chapter included a study area beyond the extent of the application site boundary (Fig 5-3). Section 5.9 examines Shadow Flicker and model the predicted daily and annual shadow flicker levels including cumulative impacts of existing operation windfarms nearby.

Mitigation measures have been outlined under sub-headings to include economic activity, tourism & amenity, health & safety, property value, residential amenity, shadow flicker.

The chapter includes a concluding stating to states that following consideration of the residual effects (post-mitigation) it is noted that the Proposed Project will not result in any significant effects on human beings in the area surrounding the Proposed Project. Following appropriate mitigation, the DoEHLG 2006 Guidelines shadow flicker limits will not be exceeded at any property.

Comments on Chapter 5

In terms of impacts on Employment & Economy, Population & Settlement Pattern, Land Use Pattern, Health & Safety, Tourism & Amenities the Planning Authority is satisfied that there will be no significant effect on the above arising from the development proposed.

The impacts on human health arising from noise and shadow flicker are noted as are the associated mitigation and monitoring measures.



Chapter 6 Biodiversity

Chapter 6 provides a description of the legislation, guidance, and policy context applicable to Biodiversity, Flora and Fauna. This is followed by a description of the ecological survey and impact assessment methodologies that were followed to inform the robust assessment. A description of the Baseline Ecological Conditions and Receptor Evaluation is provided. The potential for the Proposed Project to impact on sites that are designated for nature conservation was considered in this Biodiversity Chapter. Natural Heritage Areas (NHAs) have also been examined.

Table 6-2 Ecology Surveys informing the EIAR which have been detailed though the chapter. Section 6.5 included an Ecological Impact Assessment of Significant Effects During Construction, Operation and Decommissioning Phases.

Section 6.6.2.1 included an assessment of other Windfarms within a defined 10km study area.

The Chapter concludes to state that the Proposed Project will not result in any significant effects on any of the identified KERs. The potential for effects on European Designated Sites is fully described in the Natura Impact Statement that accompanies this application. The NIS concludes that, in view of best scientific knowledge and on the basis of objective information, the Proposed Project either individually or in combination with other plans or projects, is not likely to have adverse effects on the European Sites

Issues considered

The EIAR has identified the baseline ecological conditions on site and in the area. Designated sites (Natura Sites, NHA's and pNHAs) within 15km of the proposed development have been considered. The site mainly comprises forestry and hedgerows and agricultural lands.

The EIAR has accounted for and assessed all habitats that occur on / near the project site and assesses the potential for environmental effects on these habitats arising from the construction, operational and decommissioning phases of the project. A comprehensive range of mitigation and monitoring measures are proposed.

Comments on Chapter 6

The Planning Authority notes the identification of the likely significant impacts on biodiversity arising from the main phases of the development. The mitigation measures to protect effects on watercourses are noted.



The SID Application has been assessed by the Council's Biodiversity Officer who has considered the following

- EIAR considers cumulative impacts on biodiversity, as its focus is largely limited to the effects of the proposed development in isolation. Although it acknowledges the presence of 17 other wind farms within 10 km, there is little meaningful assessment of how impacts such as disturbance, habitat loss or collision risk may accumulate across the wider landscape over time.
- For bat species identified as having a high risk of collision, sufficient consideration of cumulative impacts on bat populations has not been provided, particularly given of the presence of 17 wind farms within a 10km zone. While the assessment outlines collision risk at the project site, it does not sufficiently evaluate the cumulative and population-level effects potentially arising from exposure of bat populations to multiple turbines across the landscape.

The Planning Authority request An Coimisiún Pleanála to consider the cumulative impacts on flora, fauna and biodiversity on the proposal and the effectiveness of the proposed mitigation measures.



Chapter 7 Ornithology (Birds)

Issues considered

Chapter 7 of the EIAR considers ornithology which includes legislation desk study, methodology, baseline conditions, receptor evaluation, impact assessment, mitigation and best practice measures, cumulative impacts and monitoring section.

The chapter sets out a comprehensive baseline assessment that forms the basis for an assessment of environmental effects. The use of the windfarm site for target species recorded within the study area set out under Table 7-8 is noted. A list of all bird species recorded during surveys is provided in Appendix 7-2. Appendix 7-3 presents results summary tables.

7.5.2 Includes describe potential effects on KORs that may occur during the construction, operation and decommissioning phase and at different times of season. A bird Monitoring Plan has been set out in Appendix 7-7.

Comments on Chapter 7

The Planning Authority note the assessment carried out in the EIAR in respect of the impact of the proposal on avi-fauna and the embedded mitigation measures in the development design to reduce impacts on avi fauna. The SID Application has been assessed by the Councils Biodiversity Officer and the follows concerns are identified;

The NIS had concluded that project site is not of significance to hen harrier is ecologically flawed and is not supported when assessed against NPWS Site-Specific Conservation Objectives for the Slievefelim to Silvermines Mountains SPA. Those objectives require the maintenance of adequate supporting habitat to sustain the species across its range and to facilitate population recovery, not simply the protection of areas currently subject to regular use.

The confirmed presence of meadow pipit on site (as per EIAR Appendix 7-2 Table 1), a core prey species for hen harrier, demonstrates that the site and adjacent areas can provide foraging habitat within the SPA's defined foraging range.

In the context of a red-listed species in severe and ongoing decline, reliance on low encounter rates to discount habitat importance represents a failure to apply a precautionary approach. Absence or low usage is not evidence of low importance it is often evidence of functional habitat loss, or landscape fragmentation. By dismissing prey-supported habitat and downplaying acknowledged pathways for displacement and collision, the NIS & EIAR



underestimate the role of the site in maintaining the ecological functionality, connectivity and resilience of the SPA.

The Planning Authority request An Coimisiún Pleanála to consider the impacts of the proposal on the Hen Harrier and the effectiveness of the proposed mitigation measures.



Chapter 8 Land, Soils & Geology

Issues considered

Chapter 8 of the EIAR deals with land, soils and geology. Hydro-Environmental Services (HES) was engaged by MKO to carry out an assessment of the potential likely and significant effects of the Proposed Carrow Wind Farm on land, soils and geological aspects of the receiving environment.

It sets out the methodology adopted for the assessment of effects, contains an assessment of the baseline environment and a detailed assessment of effects on lands, geology and soils. No sites of geological heritage come within the proposed development site and there are no recorded landslide events within the site area. The GSI Landslide database was surveyed against the proposed site is mapped mainly as having Low Susceptibility with localised areas mapped as Moderately Low and Moderately High to High Susceptibility.

Walkover surveys and geological mapping of the Site area were undertaken to assess general ground conditions; Trial pitting (28 no.) under the supervision of HES to investigate soil and mineral subsoil lithology as well as depth to bedrock; Soils gouge cores (10 no.) were carried out in areas not accessible for trial pitting; and Mineral subsoils were logged according to BS: 5930. Table 8-5 includes Site Investigation Summary at relevant locations and Table 8-6 includes for encountered bedrock conditions.

It is proposed that bedrock from the proposed 2 no. on-site borrow pits (i.e. siltstone/sandstone) will be used to construct the sub-base layer of proposed upgraded and new access roads, hardstand areas and turbine base areas. Once installed the subbase layer will be overlain by a clean capping layer of high- grade limestone.

A total of 51.65ha of coniferous forestry will be permanently felled within and around the site and 13.94ha of agricultural land will be replaced by turbine bases, hardstand areas, access roads, substation, BESS and other related infrastructure

Section 8.6 included for the proposed mitigation measures during the construction operation and decommission phases.



Comments on Chapter 8

The Planning Authority is satisfied that the assessment carried out in the EIAR in respect of the impact of the proposal on Land and Soils is comprehensive and robust. The mitigation measures proposed will serve to ensure significant environmental effects arising through the project phases will be mitigated. It is noted that the land use will change as a result of the development.

The Council's Environment Section have reviewed this chapter and have not provided any specific recommendations for An Coimisiún Pleanála to consider.



Chapter 9 Hydrology and Hydrogeology

Issues considered

Chapter 9 of the EIAR deals with water Hydrology and Hydrogeology. This section of the EIAR considers impact of the proposed development on Water. It outlines in detail the existing receiving environment, presents the likely significant effects through the construction, operation and decommissioning phases of the development and sets out mitigation and monitoring measures.

A desk study of the Site and the Water Study Area was completed to collect all relevant hydrological, hydrogeological and meteorological data. The desk study was completed to supplement site walkover surveys, drainage mapping and site investigations.

Regionally, the Proposed Wind Farm site is located entirely within the River Suir catchment and more locally within the Multeen River surface water catchment within Hydrometric Area No. 16 of the Southeastern River Basin District).

The western and central portion of the site is drained by the Lackenacoombe Stream where several headwater streams emerge from the northwest of the Site. The southwestern portion of the Farm site is drained by the Glasheenyreagha Stream.

The eastern portion of the site is drained by Aughnaglanny River which flows southerly along the eastern boundary of the site. The Aughnaglanny River flows into the Multeen River approximately 5km downstream of the Proposed Wind Farm site.

Table 9-7 outlines the water crossings that will be required at the wind farm site for internal access roads and underground cables.

Section 9.3.7 contains a discussion on flood risk with Flood Risk Assessment contained in Appendix 9-2 of the EIAR. The Flood Risk Assessment undertaken show flood zones do not extend far beyond the mapped channel of the watercourse at this location and hence do not encroach significantly within the site itself.

Surface water monitoring and sampling were undertaken and specified locations.

The water features in the vicinity of the development are (See Map below):

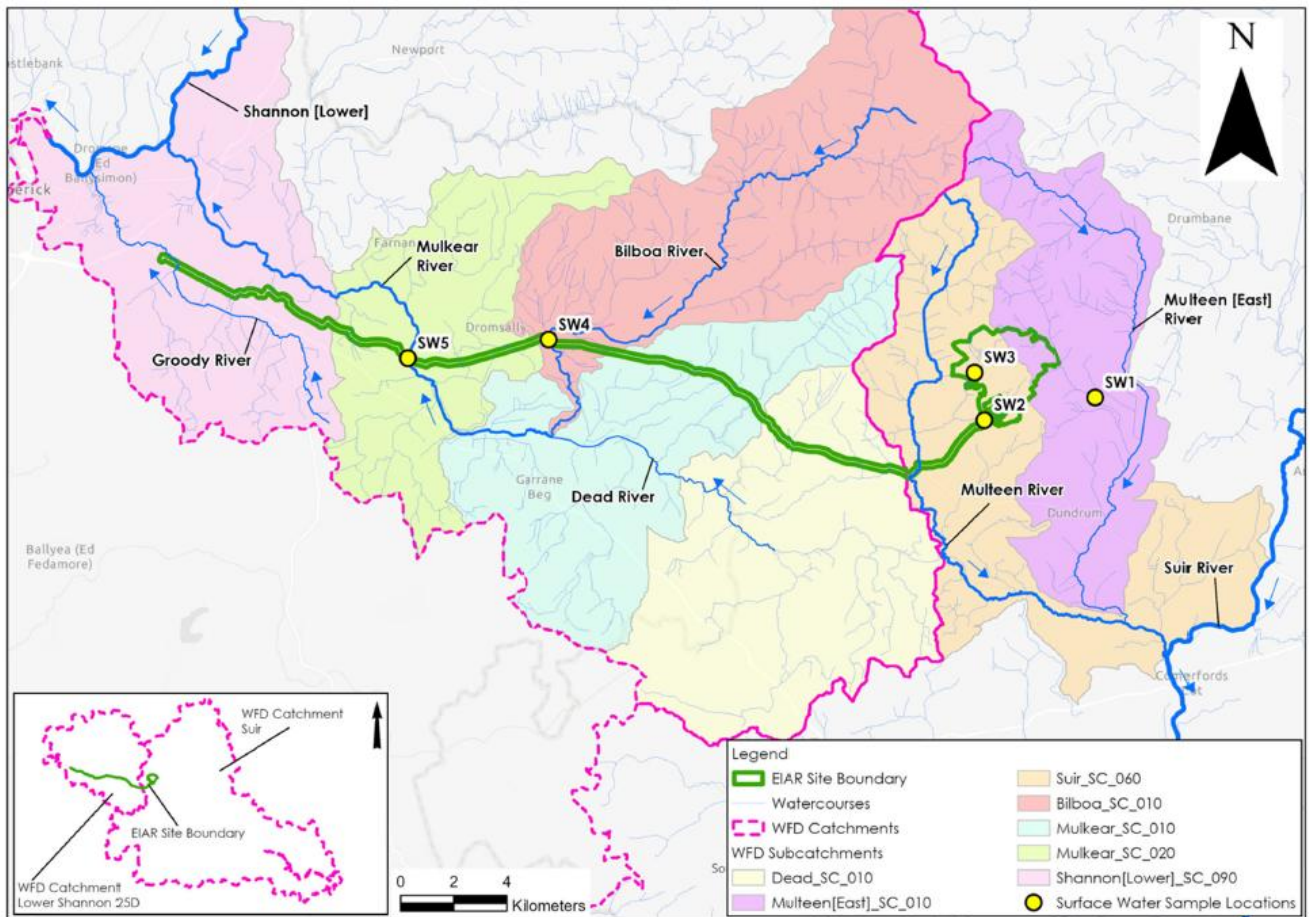


Figure 6 Regional Hydrology Map (Pg. 15)

Section 9.3.1 examines the proposed development against the Water Framework Directive (WFD) and further assessed in Appendix 9-3 and examines ground and surface water status.

The GSI/EPA do not map the presence of any Public Water Schemes (PWS) or Group Water Scheme (GWS) groundwater source protection areas within the proposed Wind Farm.

Section 9.5 examines likely significant effects and associated mitigation measures.

Comments on Chapter 9

Having reviewed the details presented the Planning Authority note the water management, mitigation and monitoring measures proposed.

The Council's Environment Section have reviewed this chapter and have provided the following observations;



- *The construction and site clearance and earth work activities can result in the release of suspended solids to surface water and could result in an increase in the suspended sediment load, resulting in increased turbidity which in turn could affect the water quality and fish stocks of downstream water bodies.*
- *It is recommended that all mitigation measures as specified in Ch 9 Hydrology and Hydrogeology F1 2026.03.24 - 231102 shall be made a condition subject to approval, to ensure all surface water runoff generated within the boundary of this development is treated and attenuated prior to diffuse discharge at pre-existing greenfield runoff rates.*
- *Adhere to Inland Fisheries Ireland Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Water 2016.*

The Planning Authority note that there is a clerical error under Section 9.3.5 (Site Drainage) has not been completed. The Planning Authority request An Coimisiún Pleanála to consider the above points in the assessment of the application.



Chapter 10 Air Quality

Issues considered

Chapter 10 of the EIAR identifies, describes and assesses the potential significant direct and indirect effects on air quality arising from the construction, operation and decommissioning of the proposed.

This chapter includes for an in-depth discussion on Climate Legislation, Policy, and Guidance and National and International climate targets.

Comments on Chapter 10

The Planning Authority is satisfied with the assessment on air quality and concurs with the conclusion that the development will result in positive impacts on climate through generation of clean renewable energy.

The development is not likely to give rise to significant adverse direct, indirect or cumulative impacts on the environment deriving from its vulnerability to risks of major accidents and/or disasters which are relevant.

Chapter 11 Climate

Issues considered

This chapter identifies, describes, and assesses the potential significant direct and indirect effects on climate arising from the construction, operation and decommissioning of the Proposed Project

Comments on Chapter 11

The Planning Authority is satisfied with the assessment on air quality and climate and concur with the conclusion that the development will result in positive impacts on climate through generation of clean renewable energy.

The development is not likely to give rise to significant adverse direct, indirect or cumulative impacts on the environment deriving from climate.

Chapter 12 Noise & Vibration

Issues considered

Chapter 12 of the EIAR supported by 9 no. appendices describes and assess the noise and vibration impacts arising from all elements of the development. The chapter includes methodology.

This chapter makes reference to comparing the predicted noise levels with noise criteria for daytime and night time noise. The background noise levels for the area recorded at monitoring points is set out in Fig. 12.2 of the EIAR.



Figure 7 Noise Sensitive Location

Section 12.3.3.2 stated that 371 no. noise sensitive locations (NSL) have been identified within approximately 3km of the Proposed Turbines. The nearest NSL is located at a distance of approximately 741 m to the nearest Proposed Turbine location.

Comments on Chapter 12

The applicant has undertaken a detailed analysis of the noise impacts that will arise from the development. The assessment concludes that the development during operation will come within the noise limits set under current Wind Energy Guidelines (2006 Guidelines). It is acknowledged that the noise environment in the area will change as a result of the development with an increase above existing noise levels.



The Council's Environment Section have reviewed this chapter and have provided specific recommendations for An Coimisiún Pleanála to consider;

- *Prior to commissioning of the wind farm, the developer shall submit a Noise Compliance Monitoring Programme (NCMP) to the planning authority for written agreement. This NCMP shall include a detailed methodology for all noise measurements, the frequency of monitoring and procedures for recording results. The approved NCMP shall be fully implemented throughout the operational phase of the wind farm.*
- *It is recommended that a noise survey is undertaken at the nearest receptors within six months of commissioning of a wind farm.*

Expert review of this chapter of the EIAR is recommended noting the projected noise and existing baseline noise levels.



Chapter 13 Archaeological, Architectural and Cultural Heritage

Issues considered

Chapter 13 of the EIAR describes the potential impacts on Archaeological, Architectural and Cultural Heritage arising from the development. The receiving environment has been identified in the EIAR together with all cultural heritage features in the vicinity of the site. Tables 13-5 & 13-6, Figures 13.1-8 (Appendix 13-1) lists of the Recorded Monuments and Protected Structure in and within the vicinity of the site.

- There are no Protected Structures within the application area.
- There are no protected structures located within the Proposed Wind Farm.
- No structures listed in the NIAH are located within the Proposed Wind Farm.
- There are a total of 22 structures recorded within the 5km study area of the Proposed Wind Farm, 15 of which are protected structures, with the remainder listed in the NIAH.
- There are no National Monuments nor Preservation Orders within 10km of the Proposed Wind farm.
- A total of 17 recorded monuments are situated within the 50m study area for the Proposed Grid Connection, none of which are National Monuments or subject to Preservation Orders. There are 3 recorded monuments located within the study area of where interventions to the existing road network will take place for the Proposed Turbine Delivery Route.
- There are three Designed Landscapes (DL) within 5km of the Proposed Wind Farm. A further Designed Landscape is located within the study area of the Proposed Turbine Delivery Route intervention and a further five are located along the study area for the Proposed Grid Connection Route.

No recorded monuments or protected structures occur within the pinch points of the turbine delivery route where accommodation works are required.

13.5.3.1 of this chapter makes reference to the Rock of Cashel, and it is considered the overall significance of effect in relation to the setting of the Rock of Cashel is defined as slight as it is 14.7km away from Turbine no. 12

Visual impacts on the sites of cultural heritage has been addressed in the EIAR.



Comments on Chapter 13

The Planning Authority is satisfied that the applicant has considered all relevant effects on cultural heritage. It is noted that direct impacts on the setting of certain features of cultural heritage will arise arising from the visual impact of the wind turbines. Given the overall extent of cultural heritage features in the vicinity the overall impacts arising from the development in this context can be accepted.



Chapter 14 Landscape and Visual

Issues considered

Chapter 14 of the EIAR assesses the landscape and visual impact of the development. The EIAR includes under Volume 2 included a comprehensive Photomontage booklet that sets out 15 no. representative views of the development.

The appendices supported with this chapter include an LVIA Methodology, LCA Assessment and Photomontage Visualisations assessment, LVIA Baseline Map, Photowire Visualisation Booklet.

The viewpoints were selected following the undertaking of an assessment of a zone of theoretical visibility for the wind farm, which examines a study area of 20km within which the wind farm or elements of same may be visible. The viewpoints provide good quality representative imagery from a range of distances from the development.

The site is within a secondary landscape amenity area as designated under the Tipperary County Development Plan 2022. There are 10 no. scenic routes and 7 no. scenic viewing points in Co. Tipperary were identified within the LVIA Study Area.

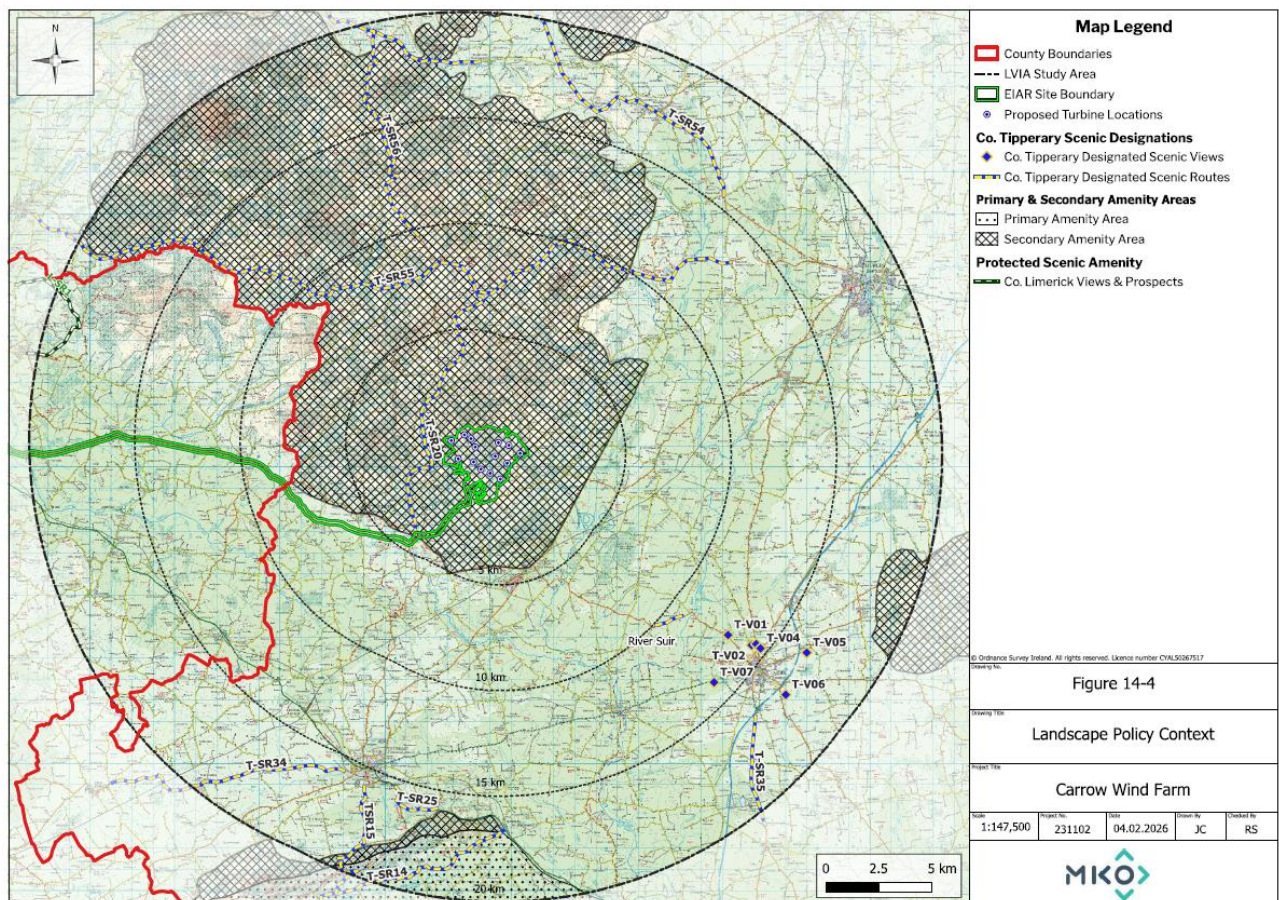


Figure 8 Landscape Policy Context

Comments on Chapter 14

The Planning Authority has no issues with the methodology by which the visual and landscape impacts of the development have been illustrated and assessed. The proposed wind turbines will be dominant feature in the landscape particularly to road users and nearby residents and will alter the landscape character.

Table 14-14 states that the proposed development from the view points will have slight, not significant or moderate impacts. 1 no. viewpoint is determined to have significant impacts VP09 Glencarbry.



Figure 9 Glencarbry Viewpoint VP09

Chapter 15 Material Assets (including Traffic and Transport, Telecommunications and Aviation)

Issues considered

This section of the EIAR considers impact of the proposed development on Material Assets with the assessment examining impacts on Traffic and Transport, on Telecommunications and Aviation and Other Material Assets, which are economic assets of human origin. Waste Management is also considered within the EPA 2022 Guidelines as part of Material Assets.

The main traffic implication generated are during the construction phase. Table 15-9. It is estimated that a total of 11,839 deliveries by truck, cement mixer or standard articulated HGVs will be made to the Site during this period. During the 18-month construction stage of the Proposed Project, it is forecast that the additional traffic that will appear on the public road network serving the Site will have a short-term slight negative effect on residents and existing road users on the delivery route. Traffic Counts and Traffic Management Plan are attached as appendices to this chapter.

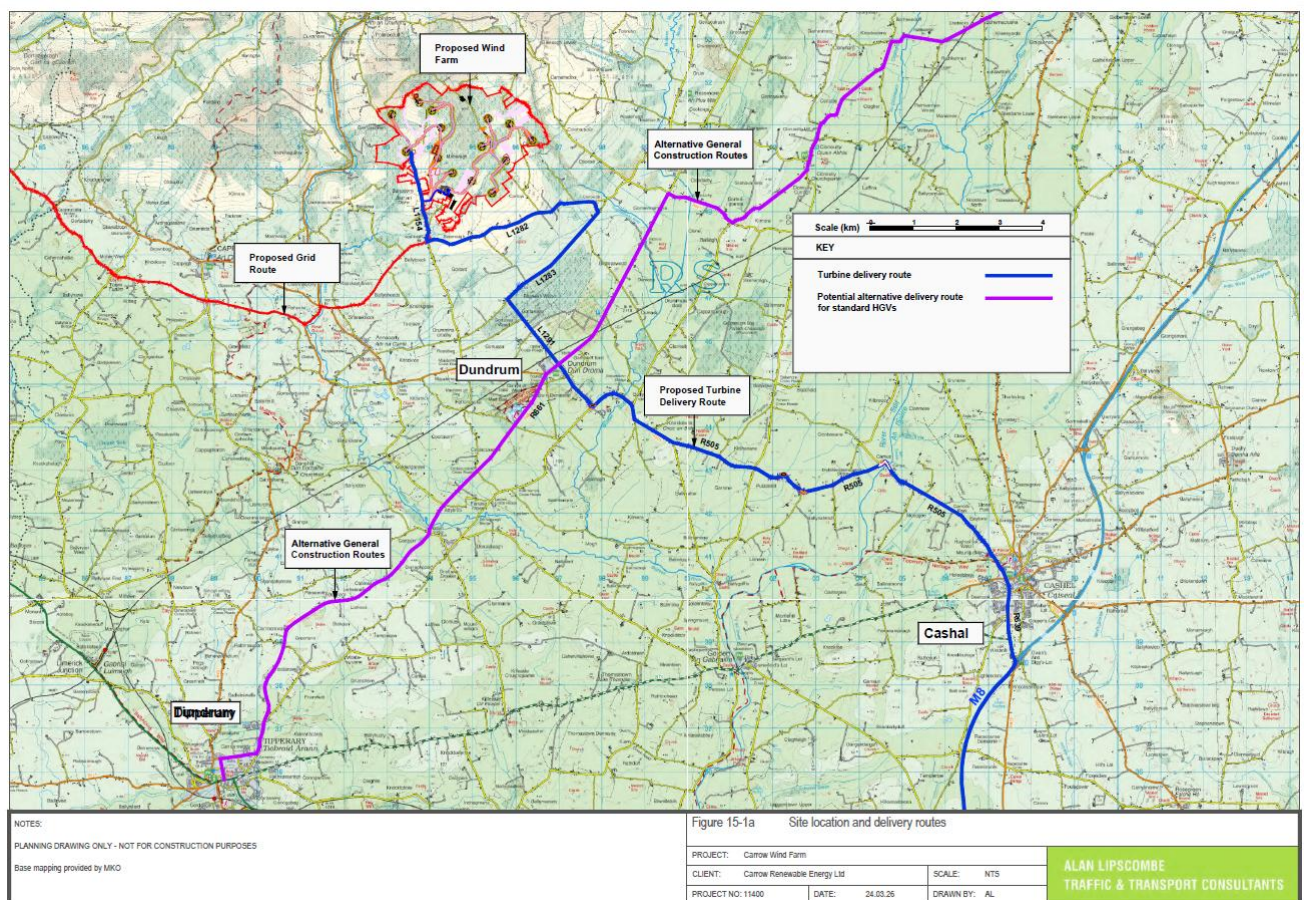


Figure 10 Turbine Delivery Route Figure 15-1a in Appendix 15-3



As the traffic impact of the Proposed Project will be imperceptible during the operational stage, there will be no residual effects during this stage. It is stated the traffic will be less in the decommission stage and subject to a decommissioning plan.

Consultation regarding the potential for electromagnetic interference was carried out with the relevant national and regional broadcasters, fixed line and mobile telephone operators and other operators. EIR and Enet were identified as operators with links and whose requested setback buffers have proposed turbines located within.

There are no IAA assets within the Proposed Wind Farm site or surrounding area that may be impacted by the proposed turbines.

Uisce Éireann services are located within the site boundary. Uisce Éireann services are located along the L-1154 local road where the local meets the proposed site entrance in the townland of Moheragh. An Uisce Éireann pressure zone is located approximately 114m south of proposed wind farm infrastructure at its nearest point. There will be no impact on the Uisce Éireann services from the Proposed Project.

Comments on Chapter 15

Having reviewed the details presented the Planning Authority does not consider that the development proposed will have significant impacts on material assets identified. Temporary disturbance may arise to utilities and services impacted by the constructions grid connection element of the project.

Operational traffic impacts are significantly less than construction impacts.

Having examined the Proposed, The District Engineer has raised the following points for An Coimisiún Pleanála to consider and full details of the District Engineer reports are included under Appendix 1;

Entrances - The layout detail of the proposed accesses to the public road is not clear from the documents provided. Operational speeds should be provided for any entrance proposed onto a public road. A document should be provided detailing all entrances onto the public road before any proposed entrance layout is agreed with TCC before construction. All existing drainage infrastructure affected by the proposed entrances must be maintained or replaced as necessary and in agreement with TCC.



Accommodation Works - Confirmation required that agreements with all landowners are in place. Confirmation will need to be sought that any alterations as part of the accommodation works are reinstated in agreement with TCC. A programme should be provided to identify the timeline for the accommodation works clearly identifying the timeframe for construction, in place and reinstatement.

Drainage - All existing drainage infrastructure must be maintained and replaced if altered. All surface water should be managed on site and ensure no impact to public or other private infrastructure.

Bridges -A document identifying all bridges, culverts or drains crossed by the final cable route and also the plant delivery route should be provided. All cables must be directionally drilled under bridge structures or culverts. If abnormally heavy loads are proposed on delivery routes that traverse a bridge or culvert an Engineering Inspection will need to be carried out by the developer before and after loading. The initial bridge inspection should identify the load carrying capacity of the structure and proposals to repair any defects should be identified in the report. Any use of the structure should only take place in agreement and coordination with TCC. Any accommodation works to such structures to be agreed with TCC.

Proposed Cables - There are details provided for cables under and over existing pipework/infrastructure. All proposed cables should only be under existing pipework/infrastructure. A detailed report to be submitted where the proposed cables share the public road with existing windfarm or solar farm for review by TCC. The report should clearly detail how the road cross section is to be shared between the two providers and interaction with any other road infrastructure.

Road Opening Licence – any excavation in the public road or verge will be subject to condition under the Road Opening Licence system. Typical conditions attached to same outlined and the developer should be made aware of them at planning stage. Compliance with these conditions may require alterations to the proposed layout. Its particularly important to note the elimination of joint bays from the public road in this regard.

Chapter 16 Major Accidents and Natural Disasters

Issues considered and comments

Chapter 16 of the EIAR assesses Major Accidents and Natural Disasters. The Proposed Wind Farm site has low potential to cause natural disasters or major accidents. Due to the absence of peat and the absence of any significant karst features, there is a low risk of a landslide occurring on the site.

Table 16-5 included potential risk that may be applicable to the proposal and risk management during the construction, operation and decommission phases.

The Planning Authority is satisfied that the applicant has considered all relevant effects and vulnerability to and from Major Accidents and Natural Disasters.



Chapter 17 Interactions

Issues considered

Chapter 17 of the EIAR assesses potential for interaction between the potential significant effects as examined under chapters 1-16. A matrix is presented in Table 17-1 below to identify potential interactions between the various aspects of the environment already assessed in this EIAR. The matrix highlights the occurrence of potential positive or negative effects during both the construction and operational phases. Table 17-1 includes Interaction Matrix for the potential for interacting impacts and include for an examination of each individual chapter and likely effects. It is concluded that when the above mitigation is implemented, and all mitigation detailed in the EIAR is implemented, the residual effects associated with the construction, operation and decommissioning of the proposed project are not significant.

Comments on Chapter 17

The Planning Authority is satisfied that the applicant has considered all relevant effects and vulnerability to and from interaction between the potential significant effects.

Chapter 18 Schedule of Mitigation Measures

Chapter 18 includes a summary of all the mitigation measures as proposed from Chapter 1-16. All mitigation and monitoring measures relating to the pre-commencement, construction, operational and decommissioning phases are set out.

There are 115 mitigation measures and 31 monitoring measures proposed for this project.



NATURA IMPACT STATEMENT

The Application is accompanied by a Natura Impact Statement (NIS) with 9 no. supporting appendices prepared by MKO.

Designated Sites

The European sites come within 15 kms of the proposed development, namely;

- Lower River Suir SAC (002137)
- Lower River Shannon SAC (002165)
- Philipston Marsh SAC (001847)
- Slievefelim to Silvermines Mountains SPA (004165)
- River Shannon and River Fergus Estuaries SPA (004077)

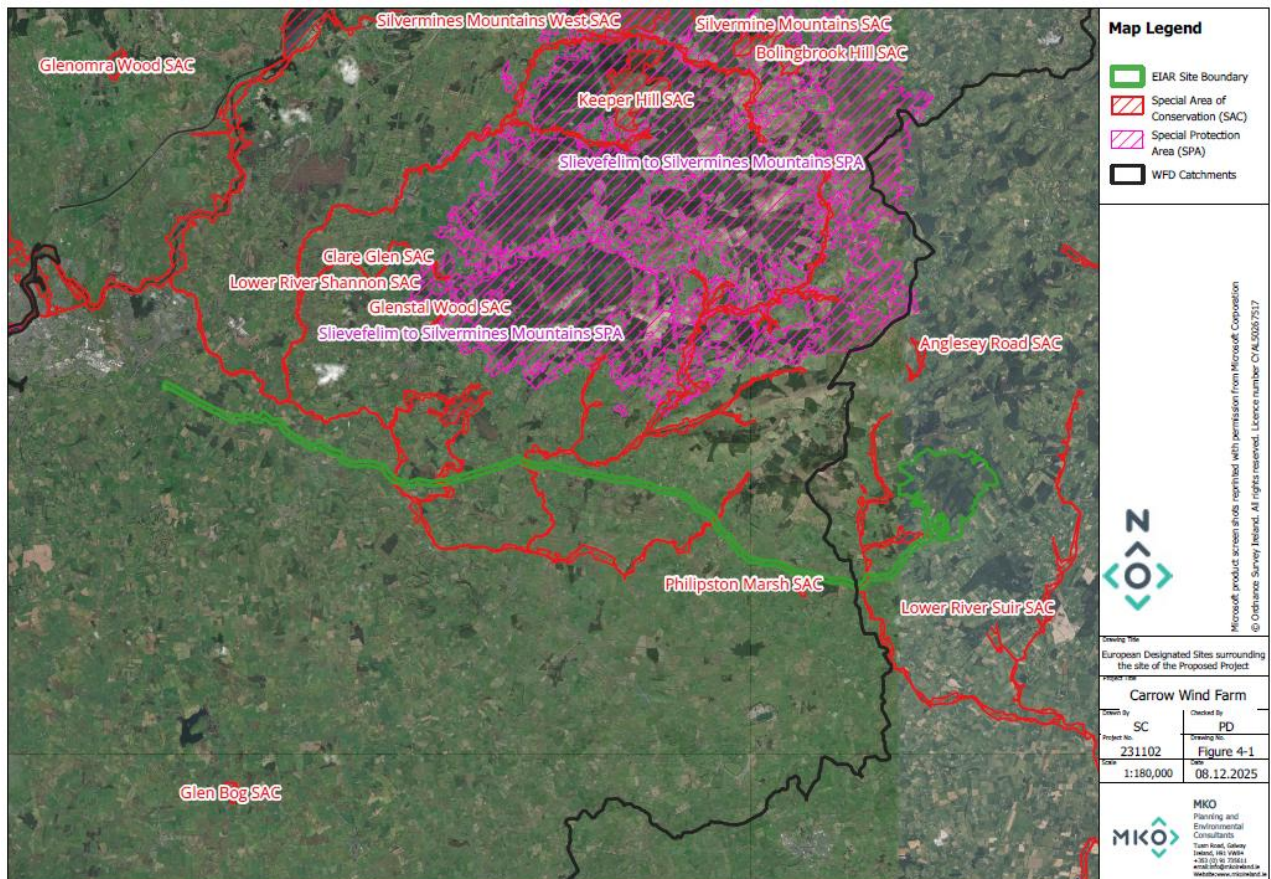


Figure 11 European Designated sites relative to the proposed site

Impacts on the Glen Bog SAC (001430), Glenomra Wood SAC (001013), Silvermines Mountains West SAC (002258), Keeper Hill SAC (001197), Bolingbrook Hill SAC (002124) and Anglesey Road SAC (002125) were considered but excluded due to distance from the development and lack of hydrological or other connectivity between the development and these sites.



The NIS identified that the works and activities associated with the construction and/or operation phase of the proposal have the potential to significantly affect the SACs if unmitigated.

Potential Impacts Identified in the NIS

The proposed development construction and operational phase could potentially affect hydrologically connected watercourse habitats that support the European sites Qualifying Interests (QIs) and /or Species of Conservation Interests (SCIs), through emissions to surface water that impact on water quality, disturbance to QI species and the introduction and / or spread of invasive species during the construction and decommissioning phase of the project

Mitigation measures proposed to avoid/manage impacts

Section 6 of the NIS includes details of measures and procedures to be implemented on site to provide for the protection of water quality and prevent the release of sediment and contaminants during construction. Specific details of surface water management mitigation measures for the proposal has been detailed in the Chapter 9 of the EIAR.

Examples of proposed mitigation measures are detailed in Section 6 of the NIS.

NIS Conclusion:

The conclusions of the NIS states that “...it can be objectively concluded that the Proposed Project, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site....”

Comments on Natura Impact Statement.

The SID Application has been assessed by the Council’s Biodiversity Officer (which was outlined under Chapter 6 of the EIAR report) and reiterated below in relation to the following:

Hen Harrier:

The conclusion of the Natura Impact Statement that the project site is not of significance to hen harrier is ecologically flawed and is not supported when assessed against NPWS Site-Specific Conservation Objectives for the Slievefelim to Silvermines Mountains SPA. Those objectives require the maintenance of adequate supporting habitat to sustain the species across its range and to facilitate population recovery, not simply the protection of areas currently subject to regular use.

The confirmed presence of meadow pipit on site (as per EIAR Appendix 7-2 Table 1), a core prey species for hen harrier, demonstrates that the site and



adjacent areas can provide foraging habitat within the SPA's defined foraging range.

In the context of a red-listed species in severe and ongoing decline, reliance on low encounter rates to discount habitat importance represents a failure to apply a precautionary approach. Absence or low usage is not evidence of low importance it is often evidence of functional habitat loss, or landscape fragmentation.

By dismissing prey-supported habitat and downplaying acknowledged pathways for displacement and collision, the NIS & EIAR underestimate the role of the site in maintaining the ecological functionality, connectivity and resilience of the SPA.

Bats:

For bat species identified as having a high risk of collision, such as Leisler's, common and soprano pipistrelles, sufficient consideration of cumulative impacts on bat populations has not been provided, particularly given of the presence of 17 wind farms within a 10km zone.

While the assessment outlines collision risk at the project site, it does not sufficiently evaluate the cumulative and population-level effects potentially arising from exposure of bat populations to multiple turbines across the landscape.

Cumulative Impacts

The EIAR gives limited consideration to cumulative impacts on biodiversity, as its focus is largely limited to the effects of the proposed development in isolation. Although it acknowledges the presence of 17 other wind farms within 10 km, there is little meaningful assessment of how impacts such as disturbance, habitat loss or collision risk may accumulate across the wider landscape over time

The Planning Authority request An Coimisiún Pleanála to assess the effectiveness of the mitigation measures and impacts on Hen Harrier, Bats and effectiveness of the cumulative impacts assessment.



KEY ISSUES AND OVERALL CONSIDERED VIEW

Introduction

All of the foregoing information forms the basis of the content of this part of the report. Below is a summary of the key issues and considered views. This part of the report should be read in conjunction with Parts 5 and 6 of this report. The key issues are set out as points of note, which An Coimisiún Pleanála may wish to investigate further.

Principle of Development

The proposed development is consistent with the current energy and planning legislation and policy, which seeks to realise cuts in greenhouse gas emissions and increase the share of electricity generation from renewable sources to address concerns with regards to climate change. Due to the scale of the proposal, the project is of strategic economic and social importance to the Region and the State. The project will assist in meeting county and national renewable energy targets and will also result in significant reductions in carbon emissions from electricity generation and reduce the reliance on imported fossil fuels and will assist in the transition from the dependency on fossil fuels to energy generation from renewable sources.

Visual Impact

The proposed wind turbines will be significant and dominant feature in the landscape particularly to road users and nearby residents to the north of the windfarm and will alter the landscape character.

Noise Impacts

Comparison of the projected noise levels from the turbine type against background noise levels shows that the noise environment in the area will change as a result of the development with an increase above existing noise levels. Expert review of this chapter of the EIAR is recommended noting the projected noise and existing baseline noise levels.

Shadow Flicker Impacts

The EIAR has identified that shadow flicker impacts may occur. The Planning Authority note the wind turbine control measures proposed to mitigate shadow flicker impacts to ensure same come within Guideline limits and consider same as implementable.



Traffic Impacts

It is requested that the applicant demonstrate that all new/upgraded entrances satisfy the standards set out under Section 6.1 of Appendix 6, Volume 3 of the TCDP 2022. All existing drainage infrastructure affected by the proposed entrances must not be compromised. The concerns set out under Section 5 and 6 in relation to impact on bridges, impact on cables on existing pipework/infrastructure and road opening licence requirements to be addressed (It is particularly important to note the requirement to eliminate joint bays from the public road in this regard).

Hen Harrier

The conclusion of the Natura Impact Statement that the project site is not of significance to hen harrier is ecologically flawed and is not supported when assessed against NPWS Site-Specific Conservation Objectives for the Slievefelim to Silvermines Mountains SPA. Those objectives require the maintenance of adequate supporting habitat to sustain the species across its range and to facilitate population recovery, not simply the protection of areas currently subject to regular use.

The confirmed presence of meadow pipit on site (as per EIAR Appendix 7-2 Table 1), a core prey species for hen harrier, demonstrates that the site and adjacent areas can provide foraging habitat within the SPA's defined foraging range.

In the context of a red-listed species in severe and ongoing decline, reliance on low encounter rates to discount habitat importance represents a failure to apply a precautionary approach. Absence or low usage is not evidence of low importance it is often evidence of functional habitat loss, or landscape fragmentation.

By dismissing prey-supported habitat and downplaying acknowledged pathways for displacement and collision, the NIS & EIAR underestimate the role of the site in maintaining the ecological functionality, connectivity and resilience of the SPA.

Bats

For bat species identified as having a high risk of collision, such as Leisler's, common and soprano pipistrelles, sufficient consideration of cumulative impacts on bat populations has not been provided, particularly given of the presence of 17 wind farms within a 10km zone.

While the assessment outlines collision risk at the project site, it does not sufficiently evaluate the cumulative and population-level effects potentially arising from exposure of bat populations to multiple turbines across the landscape.



Cumulative Impacts

The EIAR gives limited consideration to cumulative impacts on biodiversity, as its focus is largely limited to the effects of the proposed development in isolation. Although it acknowledges the presence of 17 other wind farms within 10 km, there is little meaningful assessment of how impacts such as disturbance, habitat loss or collision risk may accumulate across the wider landscape over time

Flood Risk and impact on environmental management and mitigation

The site is not located within an area at risk of flooding.

Alternatives

Tipperary County Council is broadly satisfied with the approach taken to the question of the assessment of alternatives. However, the option of connecting to the grid via private lands as an alternative to the installation of cabling and joint bays within public roads has not been fully examined and should be considered noting the impacts of such infrastructure on future road maintenance works.

Conclusion

The key issues which the Planning Authority deem relevant are set out as points of note listed above. Tipperary County Council request that An Coimisiún Pleanála engage fully with the foregoing in consideration of the application.



CONDITIONS AND CONTRIBUTIONS

Conditions

Attachment of the following conditions to be considered in the event of a grant of permission.

- Implementation of mitigation and monitoring measures in EIAR and NIS and associated reports.
- Condition limiting operational time to 35 years from commissioning.
- Agreement of final turbine type.
- Requirement for monitoring of relevant construction elements by geo technical engineer.
- Limits on Noise levels at the operational stage with monitoring programme.
- Limit on construction days/times.
- Limit on shadow flicker.
- Surface water and ground water protection measures and monitoring are to be included.
- Pre-construction Biodiversity surveys and Bird (including Hen Harrier) and Bat mitigation measures and monitoring.
- Compensatory planting.
- Measures to ensure telecommunication signals are not impacted.
- Compliance with any requirements of the Irish Aviation Authority.
- Traffic Management measures
- Cultural heritage impact measures.
- Community gain requirements
- Accommodation Works Programme including timeline for construction, in place and reinstatement.
- Decommissioning and reinstatement and associated bond.

General Contributions

The relevant sections of the Tipperary County Council Development Contribution Scheme 2020 are as follows;

- **Class 21** – The provision of energy development. The rate is €15,000 per MW capacity.
- **Section 10** (Exemptions and Reductions), states under Energy Development that energy developments have differing demands on public infrastructure and as such the base levy will be applied at differing rates. Wind is levied at 70% of the base levy.

[Tipperary County Council Development Contribution Scheme 2020.pdf](#)

Special Contributions

The District Engineer is satisfied that there is no requirement for a Special Development Contribution.



Bond

The District Engineer is satisfied that there is no requirement for a Bond condition as same will be dealt with under any Road Opening License.

District Planner:



Lauren Butler-Ryan

Date: 24/04/2026

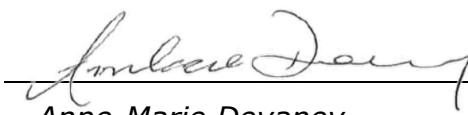
Senior Executive Planner:



Caroline Conway

Date: 30/04/2026

Senior Planner:



Anne-Marie Devaney

Date: 01/05/2026

Director of Services:



Brian Beck

Date: 01/5/2026



Appendix 1 – Recommendations of the Elected Members



Appendix 2 – Internal Reports

Report from Tipperary-Cahir-Cashel- Municipal District Engineer

Report on Carrow Windfarm due by the 23rd April 2026 [Summarize](#)



Swords, James



Reply



Reply all



Forward



Thu 23/04/2026 13:56

To: Butler-Ryan, Lauren

Cc: Stapleton, Liz; Kilmartin, Tim; Franklin, Padraig

Lauren,

See comments below:

- General Comment
 - Whilst there is a large amount of documentation the finer site specific details of what is proposed is difficult to identify. Either more detailed drawings are required around proposed layouts or agreements will need to be made with TCC before construction. The preferred scenario is that more detail is provided.
- Entrances
 - The layout detail of the proposed accesses to the public road is not clear from the documents provided. Operational speeds should be provided for any entrance proposed onto a public road. A document should be provided detailing all entrances onto the public road before any proposed entrance layout is agreed with TCC before construction.
 - All existing drainage infrastructure affected by the proposed entrances must be maintained or replaced as necessary and in agreement with TCC.
- Accommodation Works
 - I assume from the proposal that agreements with all landowners are in place?
 - Confirmation will need to be sought that any alterations as part of the accommodation works are reinstated in agreement with TCC.
 - A programme should be provided to identify the timeline for the accommodation works clearly identifying the timeframe for construction, in place and reinstatement.
- Drainage
 - All existing drainage infrastructure must be maintained and replaced if altered.
 - All surface water should be managed on site and ensure no impact to public or other private infrastructure.
- Bridges
 - A document identifying all bridges, culverts or drains crossed by the final cable route and also the plant delivery route should be provided.
 - All cables must be directionally drilled under bridge structures or culverts.
 - If abnormally heavy loads are proposed on delivery routes that traverse a bridge or culvert an Engineering Inspection will need to be carried out by the developer before and after loading. The initial bridge inspection should identify the load carrying capacity of the structure and proposals to repair any defects should be identified in the report. Any use of the structure should only take place in agreement and coordination with TCC. Any accommodation works to such structures to be agreed with TCC.
- Proposed Cables
 - There are details provided for cables under and over existing pipework/infrastructure. All proposed cables should only be under existing pipework/infrastructure.
 - A detailed report to be submitted where the proposed cables share the public road with existing windfarm or solar farm for review by TCC. The report should clearly detail how the road cross section is to be shared between the two providers and interaction with any other road infrastructure.
- Road Opening Licence – any excavation in the public road or verge will be subject to condition under the Road Opening Licence system. Below are typical conditions that would be applied to such a cabling route and the developer should be made aware of them at Planning stage. Compliance with these conditions may require alterations to the proposed layout. Its particularly important to note the elimination of joint bays from the public road in this regard.



- Examination of all available technologies including both Overhead Line (OHL) and Underground Cable (UGC) options or combinations of both) and route options other than the routing of cables along the public road.
- Specific approval of the local authority to the detail of the final route of cables through the public road space. If during construction there is a need to deviate from the detailed design then the approval of the local authority would again be sought.
- Details of where within the road cross section cables are to be placed so as to minimise the effect on the Roads Authority in its role of construction and maintenance.
- Indemnity letter – Confirmation TCC not liable for shut down costs in the future and details of requirements when working around/near the cable in the future. Legal wording below.
- Joint bays – Elimination of permanent jointing bays from the public road and verge
- Directional drill or divert all cables away from bridge structures and culverts.
- Rationalisation of the number of cables involved (including existing electric or possible future cables) and their diversion into one trench, in order to minimise the impacts on the road network and the environment along the road boundary (hedgerows).
- Reinstating required – Contractor advised full road width 75mm deep DBM and SD required.
- Minimum cover to cables 750mm
- Consider also temporary works required on roads to facilitate large items of plant.
- Contractor advised as-built CAD drawings to be submitted after construction.
- Replacement of culverts that have been excavated during the cable duct placement operation. The replacement culverts should be designed appropriately and include an allowance for the effects of climate change.
- Developer to notify the Roads Authority of the owner of the cables (Owner) and the controller (Power Controller) of the power transmitted along the cables. In addition, the condition should require Owner and Power Controller to notify the Roads Authority of any change in ownership of the cables or change of Power Controller transmitting power along the cables. In all instances the Owner and Power Controller should be required to maintain an agreed contacts list with the Roads Authority.

Letter of indemnity

1.1 Company Name and it's successors or assigns, agrees with effect from the date of this Letter that it shall hold harmless Tipperary County Council from and against and shall compensate and reimburse the Council for any liability, claim, demand, judgment, award, charge, cost, expense of any nature which is suffered or incurred by the Council or to which the Council may otherwise become subject arising out of the events or circumstances in the Specified Obligations.

1.2 For the purposes of this Letter "Specified Obligations" means the costs incurred by the Council associated with:

1.2.1 the switching out of the grid connection to name solar farm when required by ESB in order to allow the Council to perform any necessary repairs to any part of the Public Road along the Cable Route in a manner;

1.2.2 any costs associated with the removal and installation of cables forming part of the Cable Route within the Public Road along the Cable Route;

1.2.3 any additional design, engineering or construction costs associated with working in proximity to electrical cables within the Public Road along the Cable Route.

Present when the common seal
of Company Name was affixed to this Deed
and this Deed was delivered:

Regards,
James Swords (CEng)

 Tipperary Cahir Cashel Municipal District,
Tipperary County Council,
Rosanna Road,
Tipperary Town,
Co Tipperary.

¹ 0818 06 5000

 james.swords@tipperarycoco.ie



Comhairle Contae Thiobraid Árann
Tipperary County Council



Report from Environment and Climate Action Section

MEMO ENVIRONMENT SECTION



Comhairle Contae Thiobraid Árann
Tipperary County Council

To: Senior Executive Planner
From: Colette Moloney / Robert O'Brien - Environment
Re: Carrow Windfarm Project project.
Date: 21/04/2026

Regarding the proposed development, I wish to report as follows.

Description of Development:

The application has been made directly to An Coimisiún Pleanála reference ACP-92.320843 for permission for the proposed wind energy development encompassing 14 No. wind turbines with blade tip height of 185 metres (m) and all associated foundations and hardstanding areas, access roads and entrances including upgrade of existing site roads and provision of new roads, 110kV electrical substation and wind farm control buildings, battery energy storage system, underground cabling, borrow pits, electrical cabling for 110kV grid connection, biodiversity enhancement areas, temporary construction compounds, a permanent meteorological mast, temporary accommodation areas along the turbine delivery route.

The Proposed Project will be connected to the national grid via an underground 110kV electrical cable from the Proposed on-site 110kV Substation to the existing Killonan 110kV Substation in the townland of Milltown, Co. Limerick, located approximately 37km west of the Proposed Wind Farm site boundary.

Ch 9 Hydrology and Hydrogeology

Sedimentation and Nutrient run-off:

There is a risk to surface waters in the vicinity and downstream of the Proposed Wind Farm site (Aughnaglanny River, Lackenacoombe Stream, Glasheenyreagha Stream and Multeen River) from runoff. Surface waters are the main sensitive receptors associated with the Proposed Project, due to the local hydrological regime which is characterised by relatively high runoff rates and low rates of groundwater recharge. The primary potential contamination downstream surface waters are via elevated concentrations of suspended solids and nutrient enrichment.

A total of 51.6 hectares of forestry will be felled for the Proposed Wind Farm which will result in large areas of exposed soil. The construction phase also includes access road construction, turbine base/hardstanding construction, construction compound construction, met mast construction, substation construction, grid cable route, spoil management areas and borrow pits which will require varying degrees of earthworks.

These activities can result in the release of suspended solids to surface water and could result in an increase in the suspended sediment load, resulting in increased turbidity which in turn could affect the water quality and fish stocks of downstream water bodies.

Watercourse crossings:

Along the Proposed Grid Connection cable route there are 35 no. watercourse crossing locations with 23 no. being EPA mapped watercourses. All 35 no. crossings are existing culverts and bridges where works are required to accommodate the Proposed Grid Connection cable within or underneath the crossing structure.

The Proposed Grid Connection cable route intercepts the Lower River Shannon SAC at three locations where it crosses the Cahernahallia River, Bilboa River and Mulkear River via existing road and bridge structures.



At the crossing locations the cable will be placed either underneath or above the culvert by open trench method or by Horizontal Directional Drilling (HDD) method; and, no in-stream are proposed at any existing crossing location.

Ch 8 Land Soils and Geology

The Proposed Wind Farm site setting on the southern foothills of the Mauerslieve Mountains means that topography in the local area is hilly with the Proposed Wind Farm infrastructure spread across several stream valleys that drain southerly within or adjacent to the Proposed Wind Farm site. Ground elevations within the Proposed Wind Farm site range from ~376m OD (metres above Ordnance Datum) on the north to approximately 163m OD on the south. Slopes range from moderate to steep, with the steepest slopes being on the valley sides of the main the streams that drain the Proposed Wind Farm site.

The Multeen River located immediately downstream of the Proposed Project site forms part of the Lower River Suir SAC (002137).

The GSI Landslide database (www.gsi.ie) does not record any historic landslides in the vicinity of the Site or in the surrounding lands. The GSI Landslide Susceptibility Map (www.gsi.ie) classifies the probability of a landslide occurring at a given location. The Proposed Wind Farm site is mapped mainly as having Low Susceptibility with localised areas mapped as Moderately Low and Moderately High to High Susceptibility.

The depth to bedrock at the 18 no. locations ranged between 0m and 3.3m with an average of 1.8m. Trial pits that encountered bedrock were distributed throughout the Proposed Wind Farm site indicating relatively shallow bedrock across the overall Proposed Wind Farm site. At these ground elevations shallow bedrock would be expected and is consistent with GSI mapping (i.e. bedrock outcrop or subcrop). Bedrock was not encountered at the Proposed Grid Connection 110kV substation at a depth of 2.8mbgl.

Mineral subsoils most encountered were SILT, CLAY or SILT/CLAY combinations and typically presented as firm to very firm and sometimes stiff, slightly sandy, slightly gravelly with cobbles and occasionally interbedded with SAND and GRAVEL layers. The subsoils are consistent with the underlying parent material (i.e. sandstone/siltstone bedrock).

Tree removal on steep slopes may result in a short-term increase in susceptibility to shallow slope instability due to loss of root reinforcement and increased soil moisture. However, given the generally shallow depth to bedrock, firm subsoils, absence of recorded landslides, and the implementation of standard forestry and construction best practice, the risk of significant landslide occurrence is considered low and manageable.

Ch 12 Noise and Vibration

371 no. noise sensitive locations have been identified within approximately 3km of the proposed turbines. Nearest NSL is located at a distance of approximately 741m to the nearest proposed turbine.

Recommendation:

- It is recommended that all mitigation measures as specified in Ch 9 Hydrology and Hydrogeology F1 2026.03.24 - 231102 shall be made a condition subject to approval, to ensure all surface water runoff generated within the boundary of this development is treated and attenuated prior to diffuse discharge at pre-existing greenfield runoff rates.
- Adhere to *Inland Fisheries Ireland Guidelines on Protection of Fisheries During Construction Works In and Adjacent to Water 2016*.
- Prior to commissioning of the wind farm, the developer shall submit a Noise Compliance Monitoring Programme (NCMP) to the planning authority for written agreement. This NCMP shall include a detailed methodology for all noise measurements, the frequency of monitoring and procedures for recording results. The approved NCMP shall be fully implemented throughout the operational phase of the wind farm.
- It is recommended that a noise survey is undertaken at the nearest receptors within six months of commissioning of a wind farm.
- The applicant shall include the provision of a wheel wash during the construction phase to avoid the track out of soil onto public roads.

Signed: 
Date: 23/04/2026
Grace Casey, Environmental Technician,

Robert O'Brien
Executive Scientist
Environment

Signed 
Date: 23/04/2026
Colette Moloney
SEs, Environment



Report from Biodiversity Officer



Comhairle Contae Thiobraid Árann
Tipperary County Council

M E M O R A N D U M

To:	Lauren Butler-Ryan
From:	Ann Marie Fleming (Biodiversity Officer)
Date:	23/04/2026
Subject:	Re: Carrow Wind Farm

Project Description:

The Carrow Wind Farm is a proposed renewable energy project in County Tipperary consisting of 14 onshore wind turbines, associated access infrastructure, an on-site substation and a 110 kV underground grid connection to the national electricity network.

Biodiversity Officer Review

Hen Harrier:

The conclusion of the Natura Impact Statement that the project site is not of significance to hen harrier is ecologically flawed and is not supported when assessed against NPWS Site-Specific Conservation Objectives for the Slievefelim to Silvermines Mountains SPA. Those objectives require the maintenance of adequate supporting habitat to sustain the species across its range and to facilitate population recovery, not simply the protection of areas currently subject to regular use.

The confirmed presence of meadow pipit on site (as per EIAR Appendix 7-2 Table 1), a core prey species for hen harrier, demonstrates that the site and adjacent areas can provide foraging habitat within the SPA's defined foraging range.

In the context of a red-listed species in severe and ongoing decline, reliance on low encounter rates to discount habitat importance represents a failure to apply a precautionary approach. Absence or low usage is not evidence of low importance it is often evidence of functional habitat loss, or landscape fragmentation.

By dismissing prey-supported habitat and downplaying acknowledged pathways for displacement and collision, the NIS & EIAR underestimate the role of the site in maintaining the ecological functionality, connectivity and resilience of the SPA.

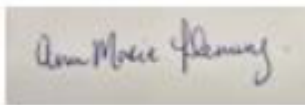
Bats:

For bat species identified as having a high risk of collision, such as Leisler's, common and soprano pipistrelles, sufficient consideration of cumulative impacts on bat populations has not been provided, particularly given the presence of 17 wind farms within a 10km zone.

While the assessment outlines collision risk at the project site, it does not sufficiently evaluate the cumulative and population-level effects potentially arising from exposure of bat populations to multiple turbines across the landscape.

Cumulative Impacts

The EIAR gives limited consideration to cumulative impacts on biodiversity, as its focus is largely limited to the effects of the proposed development in isolation. Although it acknowledges the presence of 17 other wind farms within 10 km, there is little meaningful assessment of how impacts such as disturbance, habitat loss or collision risk may accumulate across the wider landscape over time.



Biodiversity Officer – Tipperary County Council

**Resolution by the Elected Members of Tipperary County Council under Section 37E
– Planning and Development Act 2000 (as amended)**

On the

**Proposed renewable energy development including 14 wind turbines, 110kV
underground cabling connection, and all associated infrastructure and works to An
Coimisiún Pleanála (ACP-324164-26)**

At the special meeting of Tipperary County Council, held remotely via teams on Friday
22nd May, 2026

It was proposed by Councillor: Liam Browne

Seconded by Councillor: Rodger Kennedy

And Resolved:-

**That Tipperary County Council Elected Members, having considered the Chief
Executive's Report under Section 37E, resolves as follows:**

to attach the submissions to support the views expressed on planning application for
Proposed renewable energy development including 14 wind turbines, 110kV
underground cabling connection, and all associated infrastructure and works .

In accordance with Section 37E(6), the Council directs that this Resolution be
appended to the Chief Executive's Report for submission to An Coimisiún Pleanála.

Signed



Date

22nd May 2026

Item No. 5.4 Strategic Infrastructure Development Application (SID's)
MINUTES OF PROCEEDINGS OF MONTHLY MEETING OF TIPPERARY COUNTY COUNCIL
HELD IN THE COUNCIL CHAMBER, CIVIC OFFICES, NENAGH
AND REMOTELY VIA ZOOM
AT 10.00 AM
ON MONDAY 11TH MAY 2026.

Present

Cllr. Michael Smith, Acting Cathaoirleach

In person

Cllrs. Acheson, T; Bonfield, F; Brennan, Ml; Bugler, P; English, P; Hannigan, J; Hourigan, M.H.; Kennedy, R; Kennedy, Wm.; Lee, S; Lowry, M; McGrath, M; Moran, E; Morgan Walsh, L; Morris, S, O'Meara, J.P., O'Meara, Ml.; Quirke O'Meara, P; Smith Ml.

Remote

Cllrs. Ambrose, S; Anglim, M; Bourke, K; Browne, L; Cahill Skehan, K; Crosse, J; Dennehy, N; Dunne, D; FitzGerlad, J; Goldsboro, A; Molloy, R; Moloney, A; Murphy, M; O'Heney, J; Ryan, A.M.; Ryan, J; Ryan, P; Ryan, S;

Apologies

Cllr. John Carroll, Cathaoirleach,
Cllrs. Declan Burgess, Mark Fitzgerald

Also Present

Ms. Sinéad Carr, Chief Executive
Mr. Mark Connolly, Head of Finance
Mr. Brian Beck, Liam Brett, Mr. Jonathan Cooney Directors
Mr. John Shinnors, Chief Fire Officer
Mr. Thomas Duffy Senior Executive Engineer
Mr. Liam Ryan, Architect, Mr. Paul Keane S.E.E.
Mr. Damien Dullaghan, County Librarian
Ms. Caroline Conway Senior Executive Planner, Ms. Anne-Marie Devaney,
Mr. Fergal O'Donnell Executive Planner
Mr. Shane Grogan, S.E.O.
Mr Ger Walsh, Meetings Administrator

**Item No. 5.4
Strategic
Infrastructure
Development
Application
(SID's)**

To note Chief Executives Report and seek the views of the Elected Members on Tipperary County Council's submission on a renewable energy development including 14 wind turbines, 110Kv underground cabling connection and all associated infrastructure and works in the townlands of Carrow, Moheragh, Gortaderry Co. Tipperary and a number of townlands in County Limerick (www.carrowwindfarm.com) in accordance with Section 37E of the Planning and Development Act 2000, as amended.

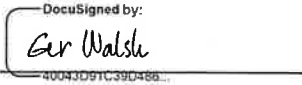
Ms. Caroline Conway outlined the background to the application, the details of the proposed works and the relevant legislative framework, noting that while the local authority is required to prepare a report, the views of the elected members may be considered.

In response to queries raised, Mr. Brian Beck clarified that the Planning Section is currently operating under the 2006 Wind Energy Guidelines. Members expressed a range of concerns regarding the proposed development, stating that certain issues had not been adequately addressed and conveying frustration at the limited time available to review the Chief Executive's Report, notwithstanding that Ms. Conway had contacted district members in advance.

Cllr. Liam Browne indicated that he had prepared his own written submission and requested that it be appended to the Chief Executive's Report; however, Ms. Sinéad Carr, Chief Executive advised that, in the interest of good governance, it would not be appropriate to attach the submission as it had not been considered by all members.

Cllr. Michael Smith requested that the matter be deferred to allow further consideration, and it was subsequently proposed by **Cllr. Dr. Phyll Bugler**, seconded by **Cllr. Mairín McGrath** and agreed by the members that the item be deferred to a Special Meeting, with all members to be notified accordingly.

There being no further business under this item, the consideration of Item No. 5.4 – Strategic Infrastructure Development Applications (SIDs) was concluded, the foregoing being a true copy which I hereby certify.

Signed/ 
Meetings Administrator

Date 11 May 2026

**MINUTES OF PROCEEDINGS OF SPECIAL MEETING OF TIPPERARY COUNTY COUNCIL
HELD
REMOTELY VIA MS TEAMS
AT 09.00 AM
ON FRIDAY 22ND MAY 2026**

To note Chief Executives Report and seek the views of the Elected Members on Tipperary County Council's submission on a renewable energy development including 14 wind turbines, 110Kv underground cabling connection and all associated infrastructure and works in the townlands of Carrow, Moheragh, Gortaderry Co. Tipperary and a number of townlands in County Limerick (www.carrowwindfarm.com) in accordance with Section 37E of the Planning and Development Act 2000, as amended.

Present

Cllr. John Carroll, Cathaoirleach

Cllr. Bourke, K; Brennan, Ml; Browne, L; Burgess, D; Fitzgerald, M; Hourigan, M.H.; Kennedy, R; Kennedy, Wm; Lee, S; McGrath, M; Molloy, R; Morgan Walsh, L; Murphy, Marie; O'Meara, J.P.; Ryan A.M.; Ryan, P; Ryan, S.

Also Present

Mr. Eamon Lonergan Deputy Chief Executive

Mr. Mark Connolly, Head of Finance

Mr. Brian Beck, Mr. Liam Brett, Mr. Damien Ginty, Directors of Services

Mr. Ger Lynch Head of I.S.

Ms. Anne Marie Devaney, Senior Planner, Ms. Caroline Conway, Mr. Fergal O'Donnell, Senior Executive Planners, Ms. Teresa Kiely A.O. Planning & Development, Ms. Anne Marie Fleming Biodiversity Officer

Mr Ger Walsh, Meetings Administrator

Item 1.0
Meeting
Protocol

The Cathaoirleach welcomed all to the Special Meeting of the Council for the purpose of considering the Chief Executive's Report prepared in accordance with Section 37E of the Planning and Development Act 2000 (as amended) in respect of the proposed Carrow Wind Farm Strategic Infrastructure Development.

He advised members that their microphone had to be turned on when they spoke and referred members attending remotely of the protocol for remote meetings circulated with the agenda and asked members to observe the rules contained therein regarding remote meetings. He checked with each Cllr. attending remotely that they could see and hear clearly.

Item No. 2.0
Strategic
Infrastructure
Development
Application
(SID's)

The Cathaoirleach then called on the Meetings Administrator to take a roll call who confirmed a quorum was present and commenced the meeting with the opening prayer.

The Cathaoirleach invited Ms. Caroline Conway, Senior Executive Planner and Ms. Anne Marie Fleming, Biodiversity Officer to brief the members.

A presentation was delivered to Members in respect of the Chief Executive's Report on the proposed Carrow Wind Farm Strategic Infrastructure Development (SID). The presentation set out the purpose of the report and provided an overview of the SID planning process under Section 37 of the Planning and Development Act 2000 (as amended), noting that such developments are of strategic economic or social importance and are determined directly by An Coimisiún Pleanála rather than the Planning Authority. Members were advised that the process includes a mandatory pre-application stage, followed by a formal application to An Coimisiún Pleanála, a period of public consultation (open until 26 May 2026), submissions from statutory bodies including the Planning Authority, and a final decision by the Board. It was noted that the Board may request further information, attach conditions, or grant permission even where a proposal materially contravenes the Development Plan, and that there is no third-party appeal mechanism, with challenge limited to Judicial Review.

Members were informed of their statutory role within the SID process. In accordance with Section 37E of the Act, the Chief Executive is required to prepare and submit a report to An Coimisiún Pleanála on the likely effects of the proposed development on the environment and the proper planning and sustainable development of the area. Prior to submission, the views of the elected members must be sought, and Members may resolve to attach recommendations to the report. It was also noted that any views expressed by Members during the meeting may be appended to the Chief Executive's Report as part of the official record.

The presentation provided a detailed overview of the proposed development. The project relates to a wind farm on a site of approximately 830 hectares located in a rural upland area approximately 2.5 km south-east of Hollyford and 4.78 km north-west of Dundrum. The lands are characterised by a mix of forestry plantations and agricultural pasture, with most turbine locations situated within coniferous forestry. The proposal comprises 14 wind turbines with a maximum blade tip height of 185 metres, together with associated infrastructure including turbine foundations, hardstanding areas, access roads and entrances (including the upgrading of

existing tracks and provision of new roads), a 110kV electrical substation, wind farm control buildings, a battery energy storage system, underground cabling, borrow pits, temporary construction compounds, a permanent meteorological mast, and accommodation works along the turbine delivery route. It is proposed to connect the wind farm to the national grid via a 110kV underground cable to the existing Killoonan Substation in County Limerick, approximately 37 km from the site, with associated works along the public road network to facilitate abnormal load deliveries. A 10-year permission is sought, with an operational lifespan of 35 years from commissioning, after which decommissioning would take place. An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) accompany the application.

Members were advised that internal reports had been prepared by the Municipal District Engineer, the Environment Section, and the Biodiversity Officer, all of which are appended to the Chief Executive's Report.

The Chief Executive's Report identified several key planning considerations. In principle, the development was noted to align with national and regional policy objectives promoting renewable energy and reduction of greenhouse gas emissions, and to be of strategic importance. However, significant issues were also highlighted. The visual impact of the development was identified as substantial, with the wind farm likely to form a dominant feature in the landscape, particularly from certain viewpoints. In relation to noise and shadow flicker, it was indicated that the development could comply with relevant wind energy guidelines subject to mitigation measures, although further expert review was recommended. Traffic and transportation issues were also raised, including lack of clarity in relation to proposed site entrances, potential impacts on bridges and existing infrastructure, and the need to ensure compliance with Development Plan standards.

Environmental considerations were highlighted as a significant area of concern. The assessment of impacts on hen harrier was questioned. It was noted that the presence of prey species indicates that the lands may function as foraging habitat, and that reliance on low observation rates does not adequately reflect ecological importance, particularly in the context of a declining, red-listed species. Concerns were also raised in relation to impacts on bat species, including insufficient assessment of cumulative impacts given the presence of multiple wind farms within a 10 km radius. More generally, it was considered that the EIAR did not adequately address cumulative effects on biodiversity, focusing primarily on the proposed development in isolation rather than in the context of existing and permitted developments in the wider area.

Ms Conway explained that, from a statutory perspective, the application is being assessed primarily against the current Wind Energy Development Guidelines 2006, as these remain the officially adopted Section 28 Ministerial Guidelines in force. However, she emphasised that the applicant had also provided detailed assessments demonstrating that the proposed development would be capable of complying with the more stringent standards contained in the Draft 2019 Guidelines.

In relation to traffic and transportation, Ms Conway outlined that the Municipal District Engineer had raised several significant concerns,

particularly regarding the lack of clarity and detailed information in the application documentation. Specific issues were identified in relation to the design and provision of new entrances onto the public road network and the extent and nature of the proposed facilitation and accommodation works. Concerns were also expressed regarding whether the applicant has secured the necessary consent from affected landowners for certain works; however, it was clarified that, in accordance with Section 37 of the Planning and Development Act, the granting of planning permission does not, in itself, confer the right to enter lands or carry out works, and that the developer must demonstrate sufficient legal interest in the lands concerned.

Ms Conway further noted that the District Engineer emphasised that all proposed new entrances must comply with the standards set out in the Tipperary County Development Plan 2022–2028, and that the applicant should be required to submit operational traffic surveys to properly assess the capacity and safety of the road network. Additional concerns were raised regarding the potential impact on bridges along the haul route, particularly in the context of abnormal loads associated with turbine delivery, as well as the interaction of underground cabling with existing pipework and infrastructure. It was also stressed that the requirements of a Road Opening Licence, which would be necessary for works within the public road, should be fully considered at this stage, as compliance with such requirements may necessitate amendments to the proposal. A particular issue highlighted was the location of joint bays within the public road corridor, which was identified as a matter of concern requiring further consideration.

Ms. Conway invited Anne Marie Fleming, Biodiversity Officer to brief the members. Ms. Fleming addressed the meeting and outlined significant concerns in relation to the ecological assessment contained in the Natura Impact Statement and EIAR. She stated that the conclusion that the site is not significant for hen harrier is ecologically flawed and fails to apply the precautionary principle, particularly given the presence of prey species such as meadow pipit. She also raised concerns regarding inadequate assessment of cumulative impacts on biodiversity, including bats, noting the presence of multiple wind farms in the wider area and the potential for landscape-level impacts to be underestimated.

In conclusion, Members were invited to consider the details of the proposal, the findings of the Chief Executive's Report, and the issues identified, and to provide their observations, views, or recommendations for inclusion in the report to be submitted to An Coimisiún Pleanála.

Elected members engaged in a detailed and substantive debate on the Chief Executive's Report, with contributions focusing on local impacts, environmental risks, and the adequacy of the supporting documentation.

Cllr. Declan Burgess acknowledged the comprehensive nature of the report and broadly accepted the principle of renewable energy development as consistent with national, regional and local policy. However, he made it clear that his concerns related to the specifics of the application rather than the concept of wind energy itself. He raised detailed concerns in relation to traffic and road safety, noting that the documentation lacked sufficient clarity on accommodation works, entrance design and construction logistics. He questioned whether adequate guarantees were in place regarding the

reinstatement of roads, drainage systems and bridges, and highlighted concerns about the absence of detailed traffic management plans and construction timelines.

Cllr. Burgess also focused on noise impacts, querying whether post-construction monitoring would be sufficiently robust and whether there would be provision for independent noise monitoring in the event of discrepancies between predicted and actual impacts experienced by residents. He further raised concerns regarding biodiversity and environmental protection, supporting the Biodiversity Officer's critique of the hen harrier assessment and emphasising the need for a precautionary approach. In addition, he highlighted the potential implications of significant forestry felling (circa 50+ hectares), questioning the knock-on impact on drainage, runoff, and downstream water quality. Overall, he expressed concern that the development would lead to considerable local disruption without sufficient mitigation measures in place.

Cllr. Liam Browne echoed many of these concerns. He queried what, if anything, had changed since earlier discussions and expressed dissatisfaction that issues, he had previously raised appeared not to have been addressed. He strongly emphasised water quality as a key concern, particularly in the context of forestry removal and changes to drainage patterns. He noted that existing water testing was not sufficient, as the real risk related to future impacts arising from construction and land disturbance, including potential effects on both ecosystems and public drinking water supplies sourced from the area.

Cllr. Browne also raised concerns about the inadequacy of assessment of protected species, specifically referencing the freshwater pearl mussel and Irish hare, which he indicated are known to exist in the area. He viewed this as a significant omission in the EIAR and NIS. He stressed the importance of applying the precautionary principle, stating that the level of uncertainty and potential environmental risk warranted greater caution. In addition, he formally requested that his previous written submission be attached in full to the Chief Executive's Report, rather than simply being reflected in the general record of members' comments.

Cllr. Mary Hanna Hourigan stated that notwithstanding her experience of wind farm developments in her local area, which she described as generally positive in terms of community engagement, local benefits and infrastructure improvements she stressed that the scale and nature of the Carrow proposal was significantly different, noting that it would result in a much larger footprint and a more intensive level of disruption, particularly during the construction phase.

Her concerns focused primarily on infrastructure and community impact, including the condition and capacity of local roads, the impact on bridges, and the adequacy of proposed works. She raised concerns regarding the extent and effectiveness of public consultation and local awareness in respect of the proposed development. While acknowledging that the statutory process allows for public submissions, she questioned whether residents were fully aware of the scale and implications of the proposal, particularly given that, if approved by An Coimisiún Pleanála, the development would have significant impacts on the wider community. She

indicated, based on local engagement, that there may be limited understanding among residents of the potential consequences of the project and expressed concern as to whether the consultation process has been sufficiently accessible and meaningful at local level. This raised concerns for her regarding the effectiveness of consultation and community buy-in, particularly given that the decision rests with An Coimisiún Pleanála rather than the local authority.

Cllr. Anne Marie Ryan reinforced the ecological concerns raised by both colleagues and officials. She emphasised the importance of the Biodiversity Officer's findings, particularly in relation to hen harrier and bat populations, and sought further clarification on the freshwater pearl mussel, noting its status as a highly protected species. She also drew attention to the scale of land disturbance (including forestry felling) and the resulting potential for increased runoff, sedimentation and deterioration in water quality, echoing earlier concerns raised by other members.

In addition to environmental concerns, Cllr. Ryan raised an important procedural issue regarding the weight and enforceability of the Council's recommendations. She questioned whether An Coimisiún Pleanála is obliged to take account of the Council's submission and whether the concerns being raised would ultimately influence the decision-making process. This reflected a broader unease among members regarding the limited decision-making role of the local authority within the SID process, despite the significant local impacts involved.

Cllr. Roger Kennedy expressed general agreement with the concerns raised by other members and emphasised the importance of ensuring that all comments made by councillors are formally attached as an addendum to the Chief Executive's Report for submission to the decision-making authority.

He raised concerns regarding the extent of public consultation, noting that while there had been engagement with directly affected landowners and those along the road network, there may not have been sufficient wider community consultation, particularly for those indirectly affected by the development.

Cllr. Kennedy also highlighted potential long-term impacts on the road network, especially along routes extending into County Limerick, pointing out that many of these roads are narrow and heavily used. He queried whether adequate coordination had taken place between Tipperary and Limerick local authority engineers.

Collectively, members contributions demonstrated a consistent theme that while there was general acceptance of the need for renewable energy and acknowledgement of policy support at national level, there was significant concern about the adequacy of the application, the robustness of environmental assessments, and the potential impact on local communities and infrastructure. Members repeatedly emphasised the need for stronger safeguards, clearer detail, and a more precautionary approach, with a particular focus on biodiversity protection, water quality, traffic safety, and community impact.

In response to members queries, Ms. Conway clarified that there have been no changes to the Chief Executive's Report since it was previously presented, as there is no mechanism to amend the main body of the report under the SID process. However, she confirmed that any submissions, attachments or views from Members, including those previously submitted by Cllr. Liam Browne, can be formally attached as addenda to the report, subject to a proposer and seconder, and will be submitted to An Coimisiún Pleanála along with the Council's observations.

She also addressed concerns regarding public consultation, outlining that the application has been widely advertised through multiple site notices, online platforms, and availability of documentation at Council offices. In relation to noise, she advised that while the Environment Section was generally satisfied with the monitoring proposals, Members' requests for independent noise monitoring could be included as part of the Council's submission, potentially through a condition requiring developer-funded monitoring. Regarding traffic, she noted that a detailed traffic management plan had been submitted and reviewed, with no significant concerns raised in that regard. She further clarified that while An Coimisiún Pleanála must have regard to the Council's submission, Members' views are not binding on the final decision.

Ms. Anne Marie Fleming, Biodiversity Officer, addressed queries relating to ecological matters, particularly the absence of freshwater pearl mussel and Irish hare in the Chief Executive's Report. She explained that her assessment was based on the EIAR and Natura Impact Statement, which included environmental DNA (eDNA) sampling upstream and downstream of the site. This testing, which is approximately 90% effective and capable of detecting all life stages, did not identify the presence of freshwater pearl mussel, and therefore it was not highlighted as a concern. She noted that eDNA represents the accepted scientific standard, including in the context of judicial review, and that proposed water quality mitigation measures during construction would also provide protection for aquatic species. She stated that, at the time of preparing her report, she was not aware that the site was considered a breeding ground for Irish hare, as this had not been identified in the submitted documentation.

In relation to forestry felling, she indicated that this falls under the remit of the Forest Service, which would impose its own controls and mitigation measures. She further clarified that Irish hare was not identified in any of the submitted ecological reports and therefore was not referenced in her assessment. Ms Fleming emphasised that, in her professional judgement, the most significant ecological weaknesses in the application related to hen harrier, rather than aquatic species.

Cllr. Liam Browne expressed concern regarding the apparent reliance of the Chief Executive's Report and associated assessments on the information provided by the developer, rather than on independently sourced or verified data. He questioned whether sufficient independent examination of ecological issues had been undertaken by the Planning Authority, noting the absence of reference to the Irish hare as a potential breeding species on the site.

He further raised doubts regarding the findings in relation to freshwater pearl mussel, stating that local knowledge and photographic evidence suggest the species may be present in the area, and queried the reliability or adequacy of the eDNA testing methodology used in the applicant's assessments. He emphasised that, in his view, there is a risk that environmental issues may not be fully identified where they are not actively investigated.

Cllr. Browne stressed that the Council should take a more proactive approach by independently considering and assessing environmental impacts, rather than relying primarily on the applicant's documentation.

Cllr. Liam Browne proposed that his written submission, be formally attached to the Chief Executive's Report. This was seconded by Cllr. Roger Kennedy, and agreed.

It was proposed by **Cllr. Liam Browne**, seconded by **Cllr. Rodger Kennedy** and resolved: -

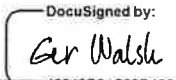
"That Tipperary County Council Elected Members, having considered the Chief Executive's Report under Section 37E, resolves as follows:

To attach the submissions to support the views expressed on planning application for Proposed renewable energy development including 14 wind turbines, 110kV underground cabling connection, and all associated infrastructure and works.

In accordance with Section 37E(6), the Council directs that this Resolution be appended to the Chief Executive's Report for submission to An Coimisiún Pleanála."

In concluding the discussion, the Cathaoirleach thanked Members for their attendance, engagement and contributions to the meeting. He acknowledged the time given by Members and expressed appreciation for their participation in the consideration of the Chief Executive's Report and the proposed development.

There being no further business under this item, the consideration of Item No. 2.0 – Strategic Infrastructure Development Applications (SIDs) was concluded at 9.52am, the foregoing being a true copy which I hereby certify.

Signed/ 
40043091C39D486
Meetings Administrator

Date 22 May 2026