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Date: 26/05/2026
Planning File Number: PAX91.324164
Proposed Development: Proposed Carrow Wind Farm Strategic Infrastructure Development
Location: Townlands of Carrow, Moheragh, Gortaderry, Co. Tipperary; Toomaline Lower, Toomaline Upper, Doon South, Lisgaugh, Cooga Upper, Coolyhenan, Milltown and Killonan, Co. Limerick

OBSERVATION

While I acknowledge the importance of renewable energy generation and the State's legally binding climate obligations, I feel compelled to make this observation against the proposed wind farm development.
I submit this objection on a number of grounds as laid out below.

DISPROPORTIONATE CONCENTRATION OF RENEWABLE ENERGY INFRASTRUCTURE

It is my opinion that the implementation of the national renewable energy policy is resulting in the disproportionate concentration of large-scale wind energy infrastructure within certain rural upland landscapes, in particular the Tipperary/Limerick uplands.
The cumulative concentration of existing wind farms, permitted wind farms, proposed wind farms, substations, grid infrastructure, battery storage infrastructure and associated forestry intervention is progressively transforming the character of this rural landscape into an energy-industrial landscape.
I submit that national climate policy does not negate the obligation to protect landscape character, safeguard rural amenity, ensure balanced spatial planning, avoid cumulative landscape saturation and equitably distribute environmental burdens.
The cumulative impact assessment presented within the EIAR is materially inadequate and fails to properly address the progressive saturation of the receiving landscape and environment arising from sequential wind energy development.
Section 2.6.2 of the EIAR identifies 24 no. wind energy developments within 25 km of the proposed turbines. Despite this, the cumulative assessment repeatedly concludes that cumulative effects are "limited", "not significant", "effectively absorbed" or "unlikely" without undertaking a sufficiently robust assessment of cumulative landscape carrying capacity, environmental saturation or long-term regional landscape transformation.
The cumulative assessment approach adopted throughout the EIAR is structurally optimistic and relies excessively on assumptions relating to visual screening by forestry and topography, habitat abundance, dilution effects, operational mitigation measures, spatial separation and absence of simultaneous construction overlap.

LANDSCAPE AND VISUAL CUMULATIVE EFFECTS

The deficiencies in the cumulative assessment are particularly evident within the Landscape and Visual Impact Assessment (LVIA).
The LVIA expressly acknowledges that the landscape of the Slieve Felim Mountains is currently characterised by numerous wind energy developments. The LVIA further acknowledges that the proposed turbines would cumulatively contribute to the effects on the character of the upland landscape and that the proposed turbines would be materially taller than many surrounding developments.
Despite these acknowledgements, the LVIA repeatedly concludes that cumulative effects would be 'limited', 'effectively absorbed' or 'not significant'.
The LVIA improperly treats the existence of previous wind farm development as evidence that the landscape is capable of absorbing additional wind energy infrastructure.
The existence of extensive prior wind energy development does not necessarily demonstrate remaining landscape capacity. Rather, it may indicate that cumulative saturation thresholds are being approached or exceeded.

EXCESSIVE RELIANCE ON FORESTRY SCREENING

A recurring feature of the LVIA cumulative assessment is the extensive reliance placed upon forestry screening, vegetation, steep terrain and spatial enclosure.
Commercial forestry is inherently dynamic and subject to cyclical felling, replanting and forestry management changes. The proposed development has an operational life of approximately 35 years. Existing forestry cannot reasonably be treated as a permanent visual mitigation mechanism throughout the life of the project.
The cumulative assessment, therefore, appears to be based upon an artificially screened visual baseline which may not persist throughout the operational life of the development.

FAILURE TO ASSESS CUMULATIVE LANDSCAPE SATURATION

While the EIAR identifies cumulative developments and provides photomontages and ZTV analysis, it does not meaningfully assess whether the wider landscape has reached or exceeded its carrying capacity for further wind energy development.

The EIAR fails to adequately examine:
- cumulative landscape saturation.
- sequential industrialisation of the uplands.
- cumulative aviation lighting effects.
- cumulative experiential effects on rural communities.
- cumulative visual encirclement; and
- long-term regional landscape transformation.

The assessment largely evaluates individual viewpoints and individual effects in isolation without properly examining the strategic cumulative transformation of the wider landscape.

ORNITHOLOGY AND ECOLOGICAL CUMULATIVE EFFECTS

The cumulative ornithology assessment also appears formulaic and insufficiently precautionary. The Birds chapter (EIAR Ch 7) repeatedly concludes that significant cumulative impacts are not predicted. These conclusions are justified on the basis that habitat is abundant, similar habitat remains available, and previous developments did not identify significant effects.
Importantly, the EIAR itself acknowledges that “displacement is likely due to high density of wind farms in the area”.
Insufficient consideration has been given to cumulative displacement, behavioural avoidance, habitat fragmentation, cumulative disturbance pressure, and sequential ecological attrition across the wider upland landscape.

HEN HARRIER

The ornithological assessment raises significant concern regarding hen harrier activity and functional connectivity. The EIAR acknowledges known hen harrier breeding activity in the wider area and records observations within potential collision height.
The EIAR further records prey-carrying behaviour within approximately 100 metres of a proposed turbine location. The assessment relies excessively on interpretation and inference, inadequately assesses functional foraging territory and cumulative displacement effects, and improperly narrows ecological relevance to confirmed nesting location alone. Particular concern arises from the acknowledgement within the EIAR that “displacement is likely due to high density of wind farms in the area”. (Birds Chapter, p. 14).

HYDROLOGY AND WATER ENVIRONMENT

The hydrology cumulative assessment is also narrowly framed. The EIAR concludes that no significant cumulative effects on the hydrological and hydrogeological environment are envisaged. This conclusion relies heavily on dilution effects, intermittent construction activity, mitigation measures and absence of construction overlap with other developments. However, cumulative hydrological effects cannot be assessed solely based on simultaneous construction overlap.
The wider landscape is already subject to extensive forestry drainage, multiple wind farm developments, repeated watercourse crossings and cumulative upland disturbance. The proposed development would further intensify hydrological intervention within sensitive upland headwater catchments through excavation, trenching, road construction, drainage modification and multiple crossing interventions.

FRESHWATER PEARL MUSSEL AND INADEQUATE APPROPRIATE ASSESSMENT

The Natura Impact Statement (NIS) adopts an internally inconsistent and insufficiently precautionary approach in relation to Freshwater Pearl Mussel (Margaritifera margaritifera) and associated catchment-scale hydrological effects.
Sections 5.1.1.1 and 5.1.1.2 of the NIS exclude Freshwater Pearl Mussel as a qualifying feature 'likely to be affected' by the proposed project. This conclusion appears to rely heavily on the statement in Section 3.2.5 that "there were no positive results for freshwater pearl mussel".
I have grave concerns that this conclusion is inconsistent with known records and the established understanding of Freshwater Pearl Mussel occurrence within the wider Multeen and Aughnaglanny river systems and catchments.
The NIS itself confirms that:
● The Proposed Wind Farm site is located entirely within the River Suir catchment.
● All Proposed Wind Farm infrastructure is located within the Multeen_020 and Aughnaglanny_010 sub-basins.
● Portions of the proposed grid connection route are also located within the Multeen catchment, and
● The Multeen River ultimately discharges to the River Suir downstream.

The apparent absence of positive survey detections at specific survey locations cannot reasonably be treated as a sufficient basis to exclude Freshwater Pearl Mussel-related impact pathways from detailed Appropriate Assessment consideration where:
● The Proposed Project is hydrologically connected to known or potentially supporting catchments.
● Freshwater Pearl Mussel is recognised as an exceptionally sensitive catchment-scale receptor, and
● Extensive permanent hydrological modification is proposed within those sub-catchments.

The NIS adopts an overly localised interpretation of ecological risk by focusing narrowly on direct survey detections within limited survey reaches rather than undertaking a robust catchment-scale assessment of cumulative hydrological pressure.
Freshwater Pearl Mussel conservation is fundamentally dependent upon:
● long-term catchment stability
● sediment control
● hydrological integrity
● maintenance of high-water quality standards; and
● avoidance of chronic fine sediment mobilisation.

The NIS inadequately assesses the long-term operational hydrological implications associated with:
● approximately 12.9 km of new access roads.
● upgraded access tracks.
● turbine hardstanding areas
● borrow pits.

● forestry removal
● permanent drainage infrastructure; and
● multiple watercourse crossings and associated hydrological interventions.

Table 8.1 of the NIS identifies substantial existing wind energy development within the Multeen catchment, including approximately 47 no. existing turbines. Despite this, the cumulative assessment remains heavily focused on temporary construction-phase sediment release and appears to give insufficient consideration to:
● long-term runoff modification
● long-term rainfall patterns associated with climate change
● cumulative hard surfacing within the catchment
● altered hydrological response.
● chronic sediment mobilisation pathways; and
● cumulative catchment-scale hydromorphological alteration.

This is a significant omission given the extreme sensitivity of Freshwater Pearl Mussel to fine sediment loading and diffuse hydrological disturbance.
The conclusion that Freshwater Pearl Mussel is "not likely to be affected" is not supported by sufficiently complete, precise and definitive findings and conclusions, as required under Article 6(3) jurisprudence.

In circumstances where:
● Hydrological connectivity is acknowledged.
● Cumulative wind farm development within the catchment is extensive.
● Permanent hydrological modification is proposed; and
● Known Freshwater Pearl Mussel populations occur within the wider Multeen and Aughnaglanny river systems.

Reasonable scientific doubt remains regarding the absence of adverse effects on the integrity of hydrologically connected European Sites and associated Freshwater Pearl Mussel catchments.

CONCLUSION

The cumulative impact assessment presented within the project documentation is materially inadequate and fails to properly assess the cumulative consequences of sequential wind energy development across the wider Tipperary/Limerick uplands.
While cumulative effects are addressed procedurally throughout the EIAR, the assessments themselves are overly optimistic, heavily mitigation-dependent and insufficiently precautionary.
The EIAR fails to adequately assess cumulative landscape saturation, cumulative carrying capacity, progressive energy-industrial landscape transformation, cumulative ecological attrition and long-term cumulative hydrological disturbance.
The NIS fails to adequately assess the likely significant impacts on the Pear Mussel.

I would respectfully request that An Coimisiún Pleanála attach substantial weight to these deficiencies in its assessment of the proposed development and refuse permission because the proposed development would not constitute proper planning and sustainable development in the area.

Support for renewable energy development does not remove the statutory obligation on An Coimisiún Pleanála to ensure that any proposed development constitutes proper planning and sustainable development, complies with Article 6(3) of the Habitats Directive, avoids unacceptable environmental effects, adequately protects landscape character, ecological integrity, hydrology and residential amenity, and is supported by robust and scientifically reliable assessment.

yours faithfully,

Bernadette Ryan.