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Re: Carrow Windfarm – Case: 324164

We wish to make observations regarding the proposed Carrow Windfarm.

We live on the road at what is the south-eastern reaches just outside of the proposed site at the postcode above. We are happy to live in a rural area and wish to remain here. We are directly affected by the proposal, and we are concerned with the following:

1. The increasing proliferation of Windfarms in our area.

It's hard to assess from the various available maps and information from state and private bodies exactly the number of windfarms and associated turbines in the area.*

From data, there are two windfarms already existing at the top of the hill stretching from:

a) Glencarbry Windfarm (12 Turbines) westward to **b) Cappawhite Windfarm (19 Turbines)**

The Sustainable Energy Ireland Map in Appendix 1 also notes the existence of a number of additional windfarms in the area including locally **c) Garracummer Windfarm (17 Turbines)** and **d) Glenough Windfarm (14 Turbines)**.

To the viewer these seem to run as one windfarm and not four different ones, which are ostensibly owned and run by four separate companies.

It's clear that the existing proliferation of these **turbines in the noted 4 windfarms above in close proximity** is the reason for this new application again for 14 additional turbines by a new company to the area – Atlantic Infrastructure Renewables Limited. **This proposal will mean that there would be more than 5 separate companies operating windfarms in our area.**

****Note: In the Applicants Environmental Impact Assessment Report (EIAR by MKO Consultants) 'fifteen wind farm developments were identified as being within the cumulative study boundary'. This equates to 95 turbines in their list. The 14 new turbines would be added to this number making 109.***

- **While we recognise the state's need to offset the use of fossil fuels and generate sustainable energies, we respectfully suggest that our area, community and as a habitat for other non-human animals, has already reached a limit in respect of its ability to host more turbines.**

Naturally we understand that windfarms need to be placed in upland areas however, this application looks to bring the current **industrial windfarm infrastructure** down the hill with 14 new turbines spread intermittently over 2 km into more inhabited areas. They propose using a longer turbine blade to mitigate for lower wind levels on what are lower gradients.

- **In essence the proposal looks to industrialise the landscape in our area and erase its rural nature.**

2. Habitat destruction

Last week we walked through the area of the proposed new turbines. We came across two deer and a hare. They naturally ran away. They are rightly wary of humans. Other species will always come out the loser in their interactions with us.

There are many more animals living in the area and its associated forestry. These range from otters to pine martens, red squirrels, bats through to smaller mammals like pygmy shrews. Many of them are protected species. The development of another windfarm will have a singular and destructive effect on their existence.

It's important to remember also, that in speaking in broad terms about biodiversity and habitats, that there are real animals, birds and fish involved. Like humans, they have a set of real needs - to live, avoid suffering, pursue natural behaviours in their own hinterland and they also have existing family or group bonds to which they are linked.

In that regard, The National Planning Framework in Objectives 84-88 (in Appendix 2) below outlines the need to restore and support existing biodiversity and habitats.

The Applicants EIAR uses the current existing windfarms original EIARs to back up their environmental findings. We would contend that these reports were written in support of *those* windfarms planning process before those windfarms were built. A more accurate assessment would be provided by reviewing the habitats post the works being completed and the windfarms coming into operation.

More concretely, in this regard, the area contains **Natura 2000 sites designated under the EU Habitats and Birds Directives**. It notes specifically **the Lower River Suir tributaries – The Multeen River to the West and East**. There are **a number of protected fish and eel species and their habitats on these sites**. (See Appendix 3)

We would contend that the works as planned would reach this area and additionally that any water run-off from works would enter the water-table.

As the Applicant's EIAR notes:

- ***'All watercourses recorded within the Proposed Wind Farm site have downstream connectivity to the Lower River Suir SAC'***.

Further, it states:

'There is a risk that pollutants and sediment laden surface water run-off generated during construction could discharge to surrounding ditches and watercourses impacting on sensitive watercourses and aquatic species downstream.'

- There is also risk that pollutants will seep into groundwater systems, impacting on groundwater quality and associated groundwater dependant receptors.
- Potential sources of pollution to surface and ground waters within the Proposed Wind Farm site include:
 - Slit laden surface water run-off.
 - Release of chemicals, including hydrocarbons, from onsite machinery, concrete and other cement-based products.
 - Drainage and seepage water resulting from infrastructure excavations.

- Stockpiled excavated material providing a point source of exposed sediment.
- Erosion of sediment from emplaced site drainage channels.’

3. Benefits to the local community

1. Job opportunities in rural or regional areas are often cited as a prospective plus on the development of the sustainable economy. However, while there may be temporary jobs created in the building of the proposed windfarm, it offers no long-term local employment when up and running. We can see that with the existing windfarms in our area which are serviced by external workers. This 2026 article from The Guardian notes the reality for local employment opportunities.

<https://www.theguardian.com/environment/2026/apr/14/windfarm-reality-green-jobs-boom-englands-east-coast-unemployment>

2. We don't feel the added community benefit fund will mitigate against the damage done to the living area.

In short, we wish to oppose this application. We understand the needs in relation to sustainable energy sources; however we expect and understand that this application is driven mainly by a profit motive rather than an environmental one. For the State it gets another slight step closer to sustainability targets, whilst at the same time also taking a step away from our bio-diversity needs.

We recognise why our area is targeted again for such works. Essentially, we were receptive on the other now existing windfarms projects, and our open door is easier to enter for developers. However, we feel that our community has taken more than our share of the responsibility in this area.

More importantly, we fear the complete destruction of our area's habitat during the works and with the prospective turbines in place. The proposers EIAR report specifically doesn't address the clear areas of concern that remain.

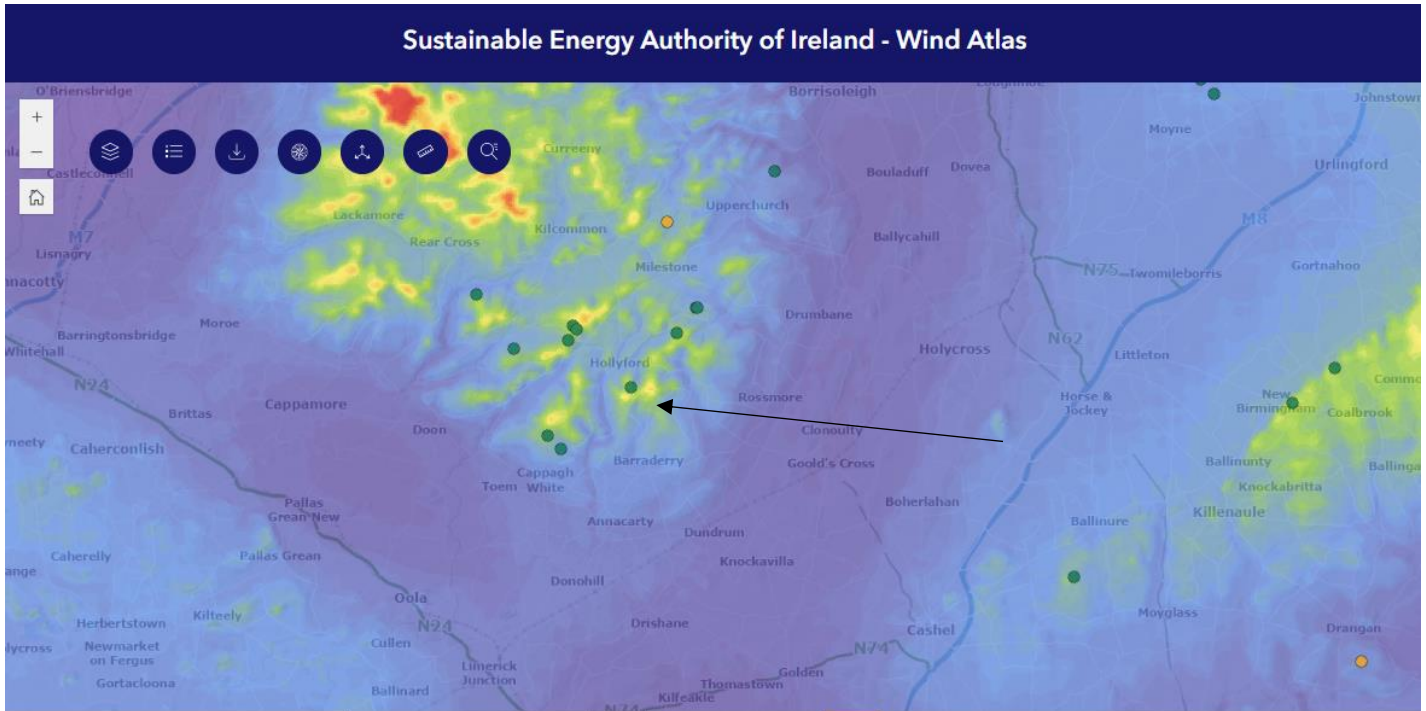
In a cost-benefit analysis, we don't see the benefits of this proposal outweighing the significant cost.

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Appendix 1 Current Proliferation of Windfarms in area



Appendix 2: National Planning Framework (First Revision, April 2025):

National Policy Objectives 84–88 (NPF First Revision, 2025)

NPO 84

In line with the National Biodiversity Action Plan and the European Union Nature Restoration Law, and best available scientific information, regional and local planning authorities shall support the preparation and implementation of the National Restoration Plan.

NPO 85

In line with the National Biodiversity Action Plan, the conservation, enhancement, mitigation and restoration of biodiversity is to be supported by:

- integrating policies and objectives for the protection and restoration of biodiversity, including the principles of the mitigation hierarchy of avoid, minimise, restore and offset, in statutory land-use plans.
- prioritising retention of existing habitats which are currently important for maintaining biodiversity (at local, regional, national and international levels), in the first instance, in the interests of ensuring continuity of habitat provision and reducing associated risks and costs.

NPO 86

In line with the objectives of the National Biodiversity Action Plan, planning authorities should seek to address no net loss of biodiversity within their plan making functions.

NPO 87

Enhance the conservation status and improve the management of protected areas and protected species by:

- implementing relevant EU Directives to protect Ireland's environment and wildlife and support the objectives of the National Biodiversity Action Plan;
- developing and utilising licensing and consent systems to facilitate sustainable activities within Natura 2000 sites.
- continued research, survey programmes and monitoring of habitats and species.

NPO 88

Facilitate the protection and restoration of biodiversity (including in European sites and the habitats and species for which they are selected) through the preparation of national guidance in relation to Planning and Biodiversity to:

- plan and manage for integration of biodiversity protection and restoration in future planning and development.
- ensure a consistent and strategic approach to biodiversity protection and restoration across planning authorities and administrative boundaries.
- support the implementation of the National Biodiversity Action Plan (2023–2030) and the forthcoming National Restoration Plan.

Appendix 3: Natura 2000 Protected areas: Lower Suir river (purple zoned areas)

The screenshot displays the Natura 2000 website interface for the Lower River Suir SAC (IE0002137). The browser address bar shows the URL: https://natura2000.eea.europa.eu/?print_preview=true&sitecode=IE0002137&views=Sites_View#data_s=id%3AdataSource_7-Layman_sites_2246%3A15871. The page features a map of the SAC area, with the river and surrounding land highlighted in purple. The map includes labels for locations such as Hollyford, Clonoulty, Cappagh White, Dunderum, and Knockavilla. A sidebar on the right provides detailed information about the site:

- Lower River Suir SAC** (IE0002137)
- NATURA2000 SITE
- Ireland (IE0002137)
- Protected under the Habitats Directive
- 7096.91 ha
- Established July 1991
- 6 HABITATS
- 8 SPECIES

Below the statistics, there is a section titled "Choose above what to display: Habitats or Species" with a dropdown menu.