

**MINUTES OF PROCEEDINGS OF SPECIAL MEETING OF TIPPERARY COUNTY COUNCIL  
HELD  
REMOTELY VIA MS TEAMS  
AT 09.00 AM  
ON FRIDAY 22<sup>ND</sup> 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](http://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 Killonan 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/  Signed by:   
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 Cathaoirleach Date 22 May 2026

Signed/  DocuSigned by:   
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 Meetings Administrator Date 22 May 2026