

LITTLETON WIND FARM RESPONSE TO SUBMISSIONS

**Response to Submissions Received by ACP
(ACP Ref. 324370-26)**

Prepared for:
Littleton Wind Farm DAC



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Abstract: Fehily Timoney and Company is pleased to submit this Submissions Response Report to An Coimisiún Pleanála (ACP) for planning application ACP Ref. 324370-26.

TABLE OF CONTENTS

1.	INTRODUCTION	1
2.	RESPONSE TO SUBMISSIONS FROM PRESCRIBED BODIES	2
2.1	ESB	2
2.1.1	Turbine 4 Positioning	2
2.2	Department of Defence.....	3
2.2.1	Item No. 1: Irish Air Corps Low-Level Flight Route over M8.....	3
2.2.2	Item No. 2: Fixed Red Obstacle Lighting	4
2.2.3	Item No. 3: Future Military Radar Systems.....	4
2.3	Department of Housing, Local Government and Heritage.....	4
2.3.1	Item No. 1: Protection of Archaeological Heritage.....	4
2.3.2	Item No. 2: Archaeologist Appointment	5
2.3.3	Item Nos. 3 and 4: Pre-Development Archaeological Testing	5
2.3.4	Item 5: Construction and Environmental Management Plan (CEMP)	6
2.4	Environmental Protection Agency.....	6
2.4.1	Item No. 1: EPA licensed Site	6
2.5	Irish Aviation Authority	7
2.5.1	Item No. 1: Air Navigation Service Provider Consultation	7
2.5.2	Item No. 2: Obstacle Lighting and Construction Notification Requirements	7
2.6	Transport Infrastructure Ireland	7
2.6.1	Item No. 1: National Road Network Access	7
2.6.2	Item No. 2: Turbine and Substation Component Deliveries	8
2.6.3	Item No. 3: Abnormal and Exceptional Abnormal Loads.....	8
2.6.4	Item No. 4: Grid Connection Route.....	9
2.6.5	Item No. 5: Greenways and Active Travel Infrastructure	9
2.6.6	Item No. 6: Protection of National Road Infrastructure	10
2.7	Uisce Éireann.....	10
2.7.1	Item No. 1: Protection of Uisce Éireann Infrastructure	10
2.7.2	Item No. 2: Hydrology, Water Quality and Drinking Water Protection	11
2.8	Tipperary County Council	11
2.8.1	Item No. 1: HGV Traffic Impact & Haul Route Maintenance	11
2.8.2	Item No. 2: Road Asset Protection, Licences, and Condition Surveys	11
2.8.3	Item No. 3: Impact on Tourism and Recreational Amenity Assets	12

2.8.4	Item No. 4: Peat and Spoil Management & Slope Stability	12
2.8.5	Item No. 5: Surface Water Drainage, IPC Licensing, and Water Quality.....	13
2.8.6	Item No. 6: Visual and Landscape Impact.....	13
2.8.7	Item No. 7: Operational Noise Impacts.....	14
2.8.8	Item No. 8: Shadow Flicker Impacts and Mitigation Monitoring.....	14
2.8.9	Item No. 9: Turbine Setback and Proximity to Residential Properties (Elected Members' Recommendation)	15
3.	RESPONSE TO THIRD PARTY SUBMISSIONS	16
3.1	Introduction.....	16

LIST OF APPENDICES

Appendix 1 – Correspondence from ACP

Appendix 2 – Addendum to Appendix 8.1 : Geotechnical and Peat Stability Assessment Report.



1. INTRODUCTION

Fehily Timoney and Company (FT) have been commissioned by Littleton Wind Farm DAC (the Applicant) to provide responses to submissions and observations made on a Strategic Infrastructure Development (SID) planning application made to An Coimisiún Pleanála (ACP Ref: 324370-26). Correspondence was first received from ACP dated 28 August 2026 requesting any submission of a response not later than the 25 September 2026.

Following review of the submissions, on 17 September 2026 FT requested an extension of the deadline to respond to same to 9 October 2026. This was confirmed by An Coimisiún Pleanála via email on 21 September 2026.

The Proposed Development forms part of the infrastructure necessary to facilitate the integration of renewable energy generation into the national electricity network. The development supports national objectives relating to decarbonisation, energy security and climate action and is consistent with the policy framework for renewable energy development and electricity transmission infrastructure. The responses contained in this report should therefore be considered in the context of the strategic importance of the Proposed Development and its contribution to national and regional policy objectives.

It should be noted from the outset that there is no new information contained within this submission; rather, all information or referenced information can be found in the application documentation lodged with the application.

As presented on the ACP website, certain "Prescribed Bodies" and "Observers" have provided submissions on the Application for consent. In total, there were 28 no. submissions, comprising 20 no. observations from third Parties, and 8 no. submissions from prescribed bodies:

- ESB
- Department of Defence
- Department of Housing, Local Government and Heritage (DHLGH) (DAU)
- Environmental Protection Agency (EPA)
- Irish Aviation Authority (IAA)
- Transport Infrastructure Ireland (TII)
- Uisce Eireann (UE)
- Tipperary County Council

This report responds to all submissions received, which are grouped into the following sub-sections for the purposes of making a comprehensive response:

- Section 2: Response to Submissions from Prescribed Bodies
- Section 3: Response to Third Party Observations

Section 3 of this report presents the Applicant's response to all the concerns raised by the third-party observations. Each observation has been carefully considered by the Applicant, and common themes/issues were collated together to provide a concise and cohesive response to all.



2. RESPONSE TO SUBMISSIONS FROM PRESCRIBED BODIES

2.1 ESB

2.1.1 Turbine 4 Positioning

ESB submitted an observation dated 8 September 2026 (note that the final date for submissions was 11 August 2026) regarding the position of proposed turbine number 4 and its impact on ESB Networks internal telecommunications. They state:

"ESB Networks Telecoms has identified potential interference arising within our critical radio communications network due to the proposed development of Littleton Wind Farm, Co. Tipperary. A detailed analysis of the development on our behalf by Joint Radio Company has identified that Turbine 4 would cause interference to one of our SCADA polling Radio (SPR) links, which is critical for the operation of ESB Networks. Furthermore, a review by the SPR team has concluded that there are currently no satisfactory internal mitigation solutions available."

And that:

*"Turbine 4 fails the telecoms interference assessment.
The turbine is predicted to impact SPR link JESBCE00 -JESBCE07.
The expected concern would be diffraction interference due to the intrusion of the turbine into the Fresnel Clearance Zone of the radio path.
JRC notes that reducing the turbine micro siting allowance would not resolve the issue because the turbine location itself obstructs the link in the current proposed coordinates."*

2.1.1.1 *Response*

From the information provided to ACP, the radio link ESB networks (ESBN) are concerned about is a UHF radio link between a Telecoms Pole located at the Thurles 110 kV Substation Compound and Gurteen Lower Wind Farm Substation. There is another radio link on the proposed Littleton Wind Farm site, Glengoole 38kV to Thurles 110kV, however, ESBN have not raised any concerns with regards to this link.

As detailed in the EIA Appendix 15.1 – Telecommunications Impact Study and Appendix 2.2 Scoping Letters, Reports and Responses, ESBN telecoms were contacted in 2021 and again in 2025. In 2021 ESBN raised concerns regarding one radio link Glengoole WF to Thurles. Following consultation in 2021 and again in 2025 no indication was given by ESBN of a second telecoms link of concern between Gurteen Lower wind farm and Thurles 110kV (Gurteen Lower WF has been operational since before 2021), therefore this is new information that needs to be considered following the submission by ESB.

AI Bridges were commissioned by the applicant to review this new information and to provide the following response to address the concerns of ESB.

Within the telecoms industry, there are several standard solutions available to avoid turbines interfering with ESBN radio links, such as realigning, relaying or re-parenting links, by using either:

- Telecoms infrastructure such as that already proposed as part of the Littleton wind farm or
- Existing telecoms infrastructure already owned and operated by ESBN



To mitigate the concerns raised by ESB, the Telecoms mast structure proposed as part of the Littleton Wind Farm can be used to avoid an interference with the ESNB radio link.

The UHF radio link of concern can be reparented via the proposed Telecoms mast associated with the proposed 110kV substation. (This mast will become a future ESNB asset). Details of this mast are included in the following planning drawings included in the application:

- P20-211-0102-0010 TELECOMS TOWER PLAN AND ELEVATION P01
- P20-211-0100-0014 1:1000 SITE LAYOUT PLAN - Sheet 5 of 68 - P01
- P20-211-0100-0004 1:5000 SITE LAYOUT PLAN - Sheet 1 of 6 -P01

The above mitigation measure is considered to mitigate any significant effects on telecom or signals traversing the site and will maintain the UHF connection between Gurteen Lower wind farm and Thurles 110kV.

Other acceptable mitigation measures would be to use existing telecoms infrastructure in the area such as:

- The existing Glengoole 38kV substation telecoms infrastructure. For this solution, the connection into Gurteen Lower could be taken from an alternative ESNB site, namely, nearby Glengoole 38 kV windfarm, which could be used to “reparent” the connection into Gurteen Lower wind farm; or
- The second telecoms mast structure already in place at the Thurles 110 kV Substation Compound could be used to install a radio link that would not be impacted by the proposed turbine at Littleton.

There are a number of precedents where standard telecom solutions have been proposed and successfully implemented to offset the potential interference of a turbine on an ESB radio link, including at the Cloonay and Firlough wind farms.

The applicant has now provided a suitable mitigation measure to address the UHF signal traversing the site, however as is standard practice, the applicant commits to ongoing engagement with ESNB throughout the development process.

2.2 Department of Defence

2.2.1 Item No. 1: Irish Air Corps Low-Level Flight Route over M8

The Department of Defence notes that the M8 is an identified Irish Air Corps low-level flight route and raises concerns regarding the cumulative effect of renewable energy developments and potential impacts on Air Corps access to regional areas.

2.2.1.1 *Response*

The Applicant notes the observations of the Department of Defence regarding military aviation operations and cumulative renewable energy development. The EIAR has adequately addressed this concern specifically in Appendix 15.3 - Department of Defence - AirCorps Aviation Review Statement.



Section 2.1.1, Appendix 15.3 of AI Bridge report states the following;

Although the proposed wind farm is partially located within the restricted area around the M8, it should be noted that there are other existing wind farms that are located within 3NM of the M7 and M8 motorways (e.g., Monaincha, Lisheen II, Lisdowney and Kill Hill wind farms) as shown below in Figure 4. It should also be noted that there is an existing meteorological mast adjacent to the proposed turbines at Littleton which is marked on the IAA obstacle dataset with a published height of 328 ft AGL.

The existing wind farms at Kill Hills, Lisdowney and Lisheen II are marked as obstacles on existing aviation charts and would inform pilots (adhering to Rules of the Air). This would mean that these existing obstacles are known to pilots flying along the M8. In the event that planning consent is granted to the proposed development the wind turbines locations would be published and registered in the IAA Air Navigation Obstacle Data Set.

Therefore Aviation impacts have been adequately addressed in the EIAR and as per standard best practice the applicant is committed to ongoing engagement with the Department of Defence and the Irish Air Corps throughout the development process.

2.2.2 Item No. 2: Fixed Red Obstacle Lighting

The Department recommends that:

"All turbines should be illuminated by Type C, Medium intensity, Fixed Red obstacle lighting..."

2.2.2.1 *Response*

It is of note that this is a standard request for developments of this type, and is implemented as standard with same. The Applicant acknowledges these obstacle lighting requirements outlined by the Department of Defence. Should permission be granted, the Applicant will ensure that all obstacle lighting requirements are incorporated into the final design.

2.2.3 Item No. 3: Future Military Radar Systems

"In the event of negative impacts on future military radar systems, the owner will engage with the Department of Defence and will provide suitable mitigations as soon as practical."

2.2.3.1 *Response*

The Applicant notes that currently there are no impacts on military radar systems. In the event potential impact was to arise in the future, the Applicant is committed to engaging with the Department of Defence to agree suitable mitigation measures.

2.3 **Department of Housing, Local Government and Heritage**

2.3.1 Item No. 1: Protection of Archaeological Heritage

The Department of Housing, Local Government and Heritage notes the potential for previously unknown archaeological features within the site and recommends the implementation of archaeological mitigation measures.



2.3.1.1 Response

The Applicant notes the observations regarding archaeological heritage. Archaeological and cultural heritage impacts have been assessed in Chapter 14 of the EIAR and appropriate mitigation measures have been identified. The Applicant is committed to the protection of archaeological heritage and the implementation of any appropriate mitigation measures.

2.3.2 Item No. 2: Archaeologist Appointment

The Department recommends that:

"A Project Archaeologist shall be appointed to oversee and advise on all aspects of the scheme from design, through inception to completion."

2.3.2.1 Response

The Applicant acknowledges the recommendation regarding the appointment of a Project Archaeologist and has no objection in principle to this requirement being secured through a planning condition. We additionally refer to Section 4.3.5 'Archaeological Management Plan' of the CEMP (Appendix 4.1 of the EIAR) which confirms that a suitably qualified archaeologist will be employed to oversee the construction phase of the Proposed Development.

2.3.3 Item Nos. 3 and 4: Pre-Development Archaeological Testing

The Department recommends that:

"The developer shall engage a suitably qualified archaeologist (licensed under the National Monuments Acts) to carry out a comprehensive pre-development peatland survey of all peatlands within the development site."

And

"The developer shall engage a suitably qualified archaeologist (licensed under the National Monuments Acts) to carry out a pre-development Archaeological Test Excavation for all areas of proposed ground disturbance and to submit an AIA report for the written agreement of the Planning Authority, following consultation with the Department, in advance of any site preparation works or groundworks, including site investigation works/topsoil stripping/site clearance and/or construction works."

2.3.3.1 Response

The Applicant notes the Department's recommendations regarding archaeological testing and survey work. The Applicant has no objection in principle to such measures being secured through appropriately worded planning conditions.



2.3.4 Item 5: Construction and Environmental Management Plan (CEMP)

The Department requests:

"The Construction Environment Management Plan (CEMP) shall include the location of any and all archaeological or cultural heritage constraints relevant to the proposed development as set out in Chapter 14 of the EIAR and by any subsequent archaeological investigations associated with the project. The CEMP shall clearly describe all identified likely archaeological impacts, both direct and indirect, and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during all phases of site preparation and construction activity."

2.3.4.1 *Response*

This recommendation is noted. Appendix 4.1 of the EIAR submitted with the Littleton Wind Farm Planning Application contains the CEMP for the project. Section 4.3.5 of this details the Archaeological Monitoring Plan.

As noted within the CEMP, the CEMP will be a key construction contract document, and the appointed contractor will be obliged to implement it in full. It will be updated by the Contractor prior to construction to take account of any relevant conditions attached to the planning permission and will be implemented for the duration of the construction phase of the Proposed Development.

As such, the Applicant would have no objection to an appropriately worded planning condition in the event of a grant of permission to the effect of this part of the Department's submission.

2.4 **Environmental Protection Agency**

2.4.1 Item No. 1: EPA licensed Site

The Environmental Protection Agency notes that the proposed development appears to be located on a site subject to an existing IPC Licence (Register No. P0499-01) and advises that the licence may need to be reviewed or amended to accommodate the proposed development. The EPA further notes that any future licence review application will be subject to the Agency's statutory assessment procedures, including Environmental Impact Assessment where required.

2.4.1.1 *Response*

In the first instance it must be highlighted that BnM have applied concurrently for substitute consent to regularise, without prejudice, the planning status of peat extraction and ancillary activities within the Littleton, Longfordpass and Lanespark Bogs (as well as other Bogs part of this Bog group which are outside the area of Proposed Development). The ACP Reference number for this is ACP-324359-26.

As part of Condition 10 of the IPC Licence (P0499-01), decommissioning and rehabilitation will be carried out as standard remedial measures associated with peat extraction and ancillary activities at the Site. In line with the BnM's accelerated decarbonisation strategy, and the availability of government funding, the company has also committed to ambitious enhanced peatland decommissioning, rehabilitation and restoration measures, targeting circa 33,000ha in over 80 no. Bord na Móna bogs. The nearby Ballybeg and Derryvella Bogs are intended to be part of PCAS.



This strategy has been developed to optimise ecosystem service benefits of peatland rehabilitation and restoration, particularly carbon storage and reducing carbon emissions. In addition, this will also benefit biodiversity and water (water quality and catchment management), as well as providing space for local communities and people to enjoy the outdoors.

Both the enhanced rehabilitation measures (PCAS) and the substitute consent are cumulatively assessed in the EIAR submitted with the Littleton Wind Farm SID Application with the future remedial measures that will be carried out at the Application Site a part of the IPC Licence requirements under Condition 10 of the Licence.

Should an IPC licence amendment be required the licence holder will engage with the EPA.

2.5 Irish Aviation Authority

2.5.1 Item No. 1: Air Navigation Service Provider Consultation

The Irish Aviation Authority advises that the Applicant should engage directly with AirNav Ireland to confirm that the proposed wind farm development and any associated cranes will not impact communications, navigation and surveillance (CNS) equipment. The Authority requests that evidence of this engagement be provided to the planning authority.

2.5.1.1 *Response*

The Applicant notes the observations of the Irish Aviation Authority regarding engagement with AirNav Ireland. The Applicant will continue to engage with the relevant aviation stakeholders throughout the development process and will provide any information required to assess potential effects on communications, navigation and surveillance infrastructure. The Applicant is satisfied that this matter can be addressed through ongoing consultation with the relevant aviation authorities.

2.5.2 Item No. 2: Obstacle Lighting and Construction Notification Requirements

The Irish Aviation Authority recommends that, in the event of a grant of permission, the Applicant engage with the Authority to agree an aeronautical obstacle lighting scheme, provide as-constructed turbine coordinates and elevations, and notify the Authority at least 30 days in advance of any crane operations.

2.5.2.1 *Response*

The Applicant acknowledges the observations of the Irish Aviation Authority regarding obstacle lighting, turbine coordinate reporting and construction notifications. The Applicant has no objection in principle to complying with these requirements and will engage with the Authority during the detailed design and construction phases of the development. The Applicant is satisfied that these matters can be adequately addressed through the implementation of appropriate planning conditions.

2.6 Transport Infrastructure Ireland

2.6.1 Item No. 1: National Road Network Access

Transport Infrastructure Ireland note that the proposed development does not require any new permanent access or intensification of existing private accesses onto the national road network and therefore does not conflict with the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities.



2.6.1.1 Response

The Applicant notes and welcomes the observations of Transport Infrastructure Ireland in relation to access arrangements and acknowledges that the proposed development does not require any new permanent access to the national road network.

2.6.2 Item No. 2: Turbine and Substation Component Deliveries

TII notes that the proposed turbine delivery route will utilise the national road network and states that:

"The applicant/developer should consult with all PPP Companies, MMarC Contractors and road authorities over which the haul routes traverse to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is maintained."

2.6.2.1 Response

The Applicant notes the observations of Transport Infrastructure Ireland regarding turbine and substation component deliveries, and that they have referred to Appendix 4.2 of the EIAR submitted with the SID application contains the Abnormal Indivisible Load Route Survey, outlining key issues associated with abnormal load delivery and notes what remedial works, either in the form of physical works or as traffic management interventions will be required to accommodate the predicted loads. Most works will be temporary in nature subject to discussions with land owners and the local road authorities.

The Applicant will continue to engage with the relevant road authorities, PPP operators and MMarC contractors throughout the detailed design and construction phases of the development and will obtain all necessary approvals and permits prior to commencement of works. The Applicant is satisfied that these matters can be adequately addressed through the implementation of appropriate planning conditions.

2.6.3 Item No. 3: Abnormal and Exceptional Abnormal Loads

TII recommends that:

"Prior to the first delivery of any abnormal or exceptional abnormal load associated with the development, the applicant shall submit to, and agree in writing, with the relevant Roads Authority(s) an Abnormal Load and Exceptional Abnormal Load Management Plan."

2.6.3.1 Response

The Applicant acknowledges TII's recommendation regarding abnormal and exceptional abnormal loads. A detailed delivery strategy and any required management plans will be prepared in consultation with the relevant road authorities prior to construction. The Applicant is satisfied that this matter can be appropriately addressed through the detailed design and construction process and can be adequately addressed through the implementation of appropriate planning conditions.



2.6.4 Item No. 4: Grid Connection Route

TII notes that:

"the national grid connection proposals are subject to a separate planning application process"

and recommends that the optimal routing solution be demonstrated as part of that separate consent process.

2.6.4.1 *Response*

The Applicant notes the observations of Transport Infrastructure Ireland regarding the grid connection proposals. As acknowledged by TII, the grid connection will form a separate planning application and will be considered through the relevant statutory processes.

2.6.5 Item No. 5: Greenways and Active Travel Infrastructure

Transport Infrastructure Ireland recommends consultation with Tipperary County Council regarding any Greenway or Active Travel proposals in the vicinity of the proposed works.

2.6.5.1 *Response*

As detailed in Section 4.3.2.1 of Chapter 4 of the EIAR there are a number of existing and planned amenity routes within the vicinity of the proposed Littleton Wind Farm, as follows:

The Littleton Labyrinth is an existing amenity route developed by Tipperary County Council which provides a shared walking and cycling route connecting the village of Horse and Jockey to Lough Derryvilla. From Horse and Jockey, it follows a mixture of public roads and the Derrynaflan greenway before joining 7.2km of newly constructed trail (opened in 2025) along the former Bord na Móna railway line between Derrynaflan and Derryvilla.

The route overlaps the proposed Wind Farm Site between the former Bord na Mona Factory trailhead and Lough Derryvilla. An amenity car park was built as part of the Labyrinth on the proposed Wind Farm Site also at the former Bord na Mona Factory trailhead.

There are two other car parks provided by Tipperary County Council at Lough Derryvilla and the Horse and Jockey as part of the Littleton Labyrinth.

The Midlands Trail Network amenity routes are proposed by Fáilte Ireland and BnM with Decision to Grant received from An Commission Pleanála dated 27th January 2026. The proposed trails link the Littleton Labyrinth and creates two new stretches of shared walking and cycling routes through the BnM peatlands, namely, between the Former Bord na Mona Factory, Lanespark and the L2111 road towards Littleton and between Lough Derryvilla and the L2111 towards New Birmingham.

These routes are generally outside the proposed Wind Farm Site except for approximately 2.4 km of permitted and existing amenity trails.

Two car parks are proposed as part of Midlands Trail Network project where the routes meet the L2111.



Tipperary County Council have also identified in their Tourism Product Development Plan 2020 – 2030 potential for the further development of the Littleton Labyrinth network of walkways and cycleways which would link Twomileborris, Gortnahoo, Urlingford, Templetohy and Littleton. If developed, these would cross the wider BnM land holdings and connect to the amenity tracks provided as part of the Proposed Wind Farm Project.

As part of the Proposed Development, a recreational amenity in the form of walking and cycling trails is proposed within the Wind Farm Site to enhance public access and promote the recreational use of the area.

A network of trails forming loops and links is proposed utilising a combination of the internal access tracks proposed for the windfarm and approximately 4.0 km of new floating dedicated amenity tracks, with all new amenity trails designed to a width of 3 m to accommodate both pedestrians and cyclists. To support public access, an additional car parking area is proposed adjacent to the site entrance to the R639 in proximity to the amenity trail.

The Applicant notes the recommendation of TII and will continue to engage with the relevant local authority regarding any existing or proposed Greenway and Active Travel infrastructure in the vicinity of the development and can be adequately addressed through the implementation of appropriate planning conditions..

2.6.6 Item No. 6: Protection of National Road Infrastructure

Transport Infrastructure Ireland notes that its submission should not be construed as consent to alter national road infrastructure and advises that any damage to national road assets arising from development works must be fully remediated in accordance with relevant standards.

2.6.6.1 *Response*

The Applicant acknowledges the observations of Transport Infrastructure Ireland regarding the protection of national road infrastructure and confirms that all works will be carried out in accordance with the requirements of the relevant road authorities and applicable standards. Any temporary works or reinstatement requirements will be agreed with the relevant stakeholders prior to commencement of development.

2.7 Uisce Éireann

2.7.1 Item No. 1: Protection of Uisce Éireann Infrastructure

Uisce Éireann notes that existing Uisce Éireann infrastructure is located along the proposed grid connection route and advises that any build-near, crossing or diversion works will require agreement with the Uisce Éireann Diversions Team. Uisce Éireann further states that:

"Uisce Éireann does not permit Build Over of its assets."

2.7.1.1 *Response*

The Applicant notes the observations of Uisce Éireann regarding existing water services infrastructure. We would flag that whilst the Grid Connection Route was assessed as part of the EIAR in this application, it will be the subject of a separate planning application. The Applicant will continue to engage with Uisce Éireann throughout the detailed design and construction phases of the development and will obtain any necessary approvals, agreements and Confirmations of Feasibility prior to the commencement of works.



2.7.2 Item No. 2: Hydrology, Water Quality and Drinking Water Protection

Uisce Éireann notes that while the turbine area is not located within a drinking water abstraction catchment, the associated grid route traverses a number of abstraction catchments, including the Kilkenny City Water Supply, Urlingford Johnstone Water Supply and Ballyragget Water Supply. Uisce Éireann requests that all mitigation measures contained within the EIAR, CEMP and SWMP are implemented and that:

"The developer shall ensure that the proposed development does not give rise to any deterioration in surface water or groundwater quality..."

2.7.2.1 *Response*

The Grid Connection Route was assessed as part of the EIAR in this application, hydrology and hydrogeology have been comprehensively assessed within Chapter 9 of the EIAR, and the Applicant confirms that all mitigation measures contained within the EIAR, CEMP and SWMP will be implemented throughout the construction, operation and decommissioning phases of the development.

2.8 Tipperary County Council

2.8.1 Item No. 1: HGV Traffic Impact & Haul Route Maintenance

Tipperary County Council notes that the construction phase will generate 13,777 HGV trips over a 24-month period on local roads L-4153 and L-4114, peaking at 64 HGV trips per day in Month 7. The Council highlights the major impact on road structures, bridges, and culverts, requesting a special financial contribution (€504,000 for 4.8 km), grass margin cutting, temporary pull-in bays, or alternatively, utilising the R639 as a single point of access (€157,500 contribution for 1.5 km).

2.8.1.1 *Response*

The Applicant notes the observations of Tipperary County Council regarding traffic impact during the construction phase. Construction traffic generation, haul routes, entrance sightlines, and traffic management have been comprehensively assessed in Section 15.5 of Chapter 15 (Material Assets - Traffic and Transportation) of the EIAR, as well as Chapter 4 (Description of the Proposed Development) and the Traffic Management Plan contained within the CEMP (Appendix 4.1).

The Applicant will agree a detailed Traffic Management Plan (TMP) and formal road maintenance/reinstatement protocols with Tipperary County Council prior to the commencement of development. Any financial contribution requirements toward public road infrastructure will be determined in accordance with statutory planning conditions and in discussion with Tipperary County Council.

2.8.2 Item No. 2: Road Asset Protection, Licences, and Condition Surveys

The Roads Capital Office and District Engineer set out comprehensive requirements including pre- and post-construction condition surveys of roads, bridges, and culverts, securing Road Opening Licences, agreeing a Grid Connection Construction Methodology, avoiding placement of jointing bays in the public road corridor, using directional drilling at bridge/culvert crossings, complying with Department of Transport Interim Guidance (Circular RW 05 of 2026), submitting georeferenced as-built GIS drawings, and providing a financial security/bond.



2.8.2.1 Response

From the outset, we would highlight that the proposed grid connection was assessed as part of the Littleton Wind Farm application, however, this will be subject to a separate planning application and consenting process.

The Applicant notes the observations of Tipperary County Council and Kilkenny County Council regarding road asset protection, licences, and condition surveys. The grid connection construction methodology, watercourse/culvert crossings via horizontal directional drilling (HDD), and traffic management have been comprehensively assessed within Chapter 15 (Material Assets - Traffic and Transportation), Chapter 4 (Description of the Proposed Development) of the EIAR, and the Construction and Environmental Management Plan (CEMP - Appendix 4.1).

The Applicant confirms that all necessary Road Opening Licences will be obtained and pre- and post-construction condition surveys will be undertaken in agreement with the relevant Local Authorities. Furthermore, georeferenced as-built drawings will be provided and relevant Department of Transport Interim Guidance will be complied with. Financial security/bond requirements and any necessary contributions will be agreed with the Local Authorities prior to the commencement of development in accordance with statutory planning conditions.

2.8.3 Item No. 3: Impact on Tourism and Recreational Amenity Assets

The Planning Authority notes key tourism amenities within or adjacent to the site, specifically the Littleton Labyrinth trail, the planned Midlands Trail Network, and Lough Derryvella (150 m from the site). The Council requests that access to the Littleton Labyrinth trail and Lough Derryvella be maintained throughout all phases of the project.

2.8.3.1 Response

The Applicant notes the observations of the Planning Authority regarding local tourism and recreational amenities. Potential effects on recreation, amenity, and tourism are assessed in Chapter 5 (Population and Human Health) of the EIAR.

The Proposed Development incorporates dedicated recreational facilities, including a 4 km walking/cycling trail and associated car park, designed to link into the wider existing and proposed amenity networks and can be seen to act as enhancements to same. The Applicant confirms that public access to key recreational amenities, including the Littleton Labyrinth trail and Lough Derryvella, will be maintained throughout all phases of the development. Where temporary control of access is required for public safety during construction activities, appropriate signage, management, and stakeholder communication will be implemented. Noting that the Midlands Trail Network is planned only at the moment and accordingly plans for this may change, as such this will be accommodated as far as is possible.

2.8.4 Item No. 4: Peat and Spoil Management & Slope Stability

The Environment Section notes that excavations will generate 114,146 m³ of peat and 283,849 m³ of mineral spoil. The Council requires the appointment of a qualified geotechnical supervisor to oversee works, daily peat stability monitoring during construction (continuing for 2 years post-construction), and the preparation of a Spoil and Peat Management Plan (SPMP) with defined trigger thresholds and an emergency contingency plan.



2.8.4.1 Response

The Applicant notes the observations regarding peat, spoil management, and slope stability. Ground conditions, excavation volumes, and slope stability have been comprehensively assessed in Chapter 8 (Land, Soils and Geology), supported by the Geotechnical and Peat Stability Assessment Report (Appendix 8.1) and the Peat and Spoil Management Plan (Appendix 8.2).

Total estimated excavation volumes comprise 114,146 m³ of peat and 283,849 m³ of mineral spoil, all of which will be retained and managed on site. The Applicant confirms that earthworks and construction activities will be supervised by suitably qualified and experienced geotechnical personnel. Furthermore, all works will be undertaken in strict accordance with the Construction Environmental Management Plan (CEMP - Appendix 4.1), incorporating emergency response procedures, weather-related work stoppage criteria, and stability monitoring to ensure adequate safety factors are maintained throughout all project phases.

2.8.5 Item No. 5: Surface Water Drainage, IPC Licensing, and Water Quality

The Environment Section notes that site drainage historically discharged via silt ponds under IPC Licence P0499-01. The Council requires clarification on whether new drains fall under the IPC licence, confirmation of settlement pond capacities, daily water quality monitoring during construction, strict discharge limits (pH 6.0--9.0, Suspended Solids < 25 mg/L, no visible oil film), and consultation with Inland Fisheries Ireland (IFI) regarding watercourse crossings.

2.8.5.1 Response

The Applicant notes the observations of Tipperary County Council regarding site drainage, the IPC Licence (P0499-01), water quality monitoring, discharge limits, settlement pond capacity, and consultation with Inland Fisheries Ireland (IFI). Should an IPC licence amendment be required the licence holder will engage with the EPA.

Surface water and drainage management across the Site have been comprehensively assessed in Chapter 9 (Hydrology, Hydrogeology and Water Quality), supported by the Surface Water Management Plan (SWMP - Appendix 9.3) and Chapter 6 (Biodiversity) of the EIAR. Consultation with Inland Fisheries Ireland (IFI) has been initiated and will continue throughout the detailed design and construction phases.

2.8.6 Item No. 6: Visual and Landscape Impact

The Planning Authority highlights that the 11 proposed wind turbines (200 m tip height) will be significant features in the local landscape and will alter landscape character. The Council requests that the Commission be fully satisfied regarding visual and landscape compatibility.

2.8.6.1 Response

The Applicant notes the observations of Tipperary County Council regarding visual and landscape compatibility and the 11 proposed wind turbines (200 m tip height). Landscape and visual impacts have been comprehensively assessed in Chapter 13 (Landscape and Visual Impact) of the EIAR. The Applicant confirms the following:



The Development is located within an area designated as 'Open for Consideration' for wind energy in the Tipperary Wind Energy Strategy 2016 and within a 'Flat Peatland' landscape capable of accommodating tall turbines. The site is not located within any Primary or Secondary Special Amenity Areas. It also maintains a separation distance of >800 m from the nearest residential dwelling, fully complying with and exceeding the mandatory setback of four times tip height (800 m) in the draft Wind Energy Development Guidelines (2019). Topography, vegetative screening, and array design limit actual visibility. Comprehensive assessment across all key receptors confirms that residual visual effects and cumulative effects with other wind farms in the 20 km study area are Not Significant.

2.8.7 Item No. 7: Operational Noise Impacts

The Planning Authority notes that calculated operational noise levels show an increase above prevailing baseline noise environments (particularly during nighttime) at surrounding sensitive receptors and recommends an expert review of the assessment.

2.8.7.1 *Response*

The Applicant notes the observations of the Planning Authority regarding operational noise levels. Operational noise has been comprehensively assessed in Chapter 11 (Noise and Vibration) of the EIAR in accordance with national guidelines (DEHLG 2006) and international best practice (ETSU-R-97, IOA GPG). The Applicant confirms:

Predicted operational turbine noise levels comply fully with derived daytime and night-time noise limits at all sensitive receptors across all wind speeds. Night-time noise levels remain below the 43 dB L_{A90} criterion at all locations to protect residential amenity and prevent sleep disturbance. Combined operational noise with existing and permitted wind farms in the area complies with all applicable limits. Operational noise from the on-site substation transformer complies with BS 4142 and WHO night-noise guidelines, with no significant adverse effects predicted.

2.8.8 Item No. 8: Shadow Flicker Impacts and Mitigation Monitoring

The EIAR models worst-case shadow flicker impacts occurring at up to 18 residential receptors. The Planning Authority notes the proposed automated turbine curtailment/control modules and requests that implementation and monitoring of these measures be strictly conditioned and verified.

2.8.8.1 *Response*

The Applicant notes the observations of the Planning Authority regarding shadow flicker impacts at residential receptors and the request for strict conditioning and verification of proposed control measures.

Shadow flicker has been comprehensively assessed within Chapter 12 of the EIAR. The assessment demonstrates that while worst-case theoretical predictions exceed limits at certain receptors, a more realistic scenario accounting for sunshine hours results in shadow flicker levels remaining below the 30-hour per year threshold across all residential receptors.

To guarantee protection, the Applicant commits to installing automated shadow flicker control modules (comprising light sensors and control software) on the turbines. These modules will automatically curtail individual turbines whenever light and meteorological conditions allow shadow flicker to occur at sensitive receptors. Furthermore, a Complaints Investigation Procedure will be agreed with the Local Authority prior to operation to confirm, validate, and verify any reported instances to ensure full compliance with regulatory standards.



2.8.9 Item No. 9: Turbine Setback and Proximity to Residential Properties (Elected Members' Recommendation)

Following a resolution passed at the Council meeting on 14th September 2026, the Elected Members specifically requested that particular consideration be given to the proximity of proposed wind turbines to nearby residential dwellings, with specific emphasis on separation distances (approx. 700 m) in the Clonoura area.

2.8.9.1 *Response*

The Applicant notes the resolution passed by the Elected Members on 14th September 2026 regarding turbine setback distances and proximity to residential dwellings, specifically in the Clonoura area.

Population, human health, and turbine setback considerations have been comprehensively assessed in Chapter 5 (Population and Human Health) and Chapter 4 (Description of the Proposed Development) of the EIAR. The wind farm design achieves a minimum separation distance of 851 metres between any proposed turbine and the nearest third-party residential property (located south-west of T11).

This operational layout fully complies with both the current Wind Energy Development Guidelines (2006) statutory requirement of a 500-metre setback and the Draft Revised Wind Energy Development Guidelines (2019) setback requirement of four times the tip height (800 metres based on the proposed 200-metre tip height). In the Clonoura area specifically, the setback provided substantially exceeds these national draft and statutory minimum separation thresholds.



3. RESPONSE TO THIRD PARTY SUBMISSIONS

3.1 Introduction

In total, there were 20 no. third party submissions recorded by An Coimisiún Pleanála. To avoid duplication of responses to multiple similar items, the themes from the third-party submissions are grouped together under headings and a response from the Applicant is provided. If the third-party concerns were already addressed in the EIAR, or other Planning documentation, a cross-reference to the relevant document, section or drawing has been included below.

The themes raised are addressed below having regard to the EIAR, the planning application documentation and the mitigation measures proposed.

Third Party Submission	Response
Item 1: Biodiversity, Peatland, Hydrology, Waste & Ecosystem Recovery <u>Local Flora, Fauna & Sensitive Habitats:</u> Observers express concern over the disruption to local flora, fauna, and sensitive habitats on the Bog group, noting high-density populations of Irish Hare, Red Squirrels, Pine Martens, Otters, and rare species like the Marsh Fritillary butterfly, Large Heath butterfly, and White-clawed Crayfish.	<u>Local Flora, Fauna & Sensitive Habitats:</u> A detailed Biodiversity Assessment has been undertaken by a team of suitably qualified specialists as part of the submitted EIAR. This included an extensive range of habitat, fauna, bird, bat, mammal and aquatic ecology surveys. These baseline ecological surveys informed in the first instance areas where it was feasible to locate the proposed development and then the layout, which follows the mitigation hierarchy (avoidance, minimisation, restoration) by siting infrastructure preferentially on degraded cutaway bog and existing tracks. Mammal and species-specific surveys (e.g., Marsh Fritillary) were completed. Mitigation such as pre-construction sweep surveys, Ecological Clerk of Works supervision, seasonal restrictions, and watercourse buffer zones, have been built into the CEMP. The implementation of these will ensure no significant residual adverse effects on protected flora or fauna occur. Chapter 6 of the EIAR deals with Biodiversity, and finds that <i>"No significant residual effects are predicted for habitats and flora."</i>



Third Party Submission	Response
<u>Avian Species Disturbance:</u> Concerns raised over bird disturbance, collision risks, and displacement affecting high-conservation-concern species, including breeding Curlew, Lapwing, Snipe, Woodcock, Hen Harrier, Merlin, Barn Owl, Short-eared Owl, Whooper Swans, and a pair of Common Cranes (<i>Grus grus</i>). Additional bird species identified in local observer submissions include Golden Plover, Yellowhammer, Grebes, Red Kite, Redwing, Meadow Pipit, White-tailed Sea Eagle, Kingfisher, Skylark, Willow Warbler, Linnet, Goldcrest, Coot, Common Tern, and breeding Kestrels on the old Bord na Móna premises.	<u>Avian Species Disturbance:</u> Vantage Point (VP) surveys were carried out during the breeding season of 2021, 2022, 2023, 2024 and non-breeding seasons of 2020-21, 2021-22, 2022-23, 2023-24 and 2024-25 in line with Scottish National Heritage (SNH) guidance, with additional migration VP watches also completed in Autumn 2021, 2022, 2023 & 2024 and Spring 2022, 2023, 2024 & 2025. Due to the overlap between habitat suitability and site use for breeding waders and waterbirds such as gulls, geese, ducks and rails, the breeding wader survey methodology also captured data on breeding waterbirds. These were completed during the 2021, 2022, 2023 and 2024 breeding seasons. Potentially suitable areas of hen harrier roosting habitat were identified based on a desktop study and field observations gathered during surveys. These were conducted from October to March during winter 2021-2022, 2022-2023, 2023-2024, and 2024-2025. Specific surveys were also carried out over a number of seasons for Merlin, Barn Owl, Kingfisher as well as Hinterland surveys which covered 56 sites within 15 km from the proposed Wind Farm site. These sites were chosen as they had suitable habitat for the following target groups and species: raptors, waders and waterfowl. Hinterland surveys were carried out every month across all survey seasons from winter 2020-21 to winter 2024-25. Appendix 7.1 of the EIAR provides full details of the results of these surveys. These surveys influenced the design of the proposed wind farm and dictated turbine placement. Section 7.10 of EIAR Chapter 7, Ornithology, states: <i>"Following the implementation of construction and decommissioning phase mitigation, no significant negative effects will remain for avifauna."</i> Appendix 7.2 of the EIAR contains the Collision Risk Model which shows no significant effects following implementation of mitigation.

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Third Party Submission	Response
<u>Hydrological Conflict & Watercourse Impacts:</u> Ongoing drainage from the main drainage canal towards the River Suir and wind farm construction could "conflict with the continued hydrological and ecological recovery of the bog" and restrict future rewetting. Concerns are also noted regarding heavy construction, foundations, and concrete use near local watercourses like the Blackwater Stream.	<u>Hydrological Conflict & Watercourse Impacts:</u> In order to mitigate against hydrological and watercourse impacts the Design Team obtained comprehensive baseline data, undertook risk assessment and then implemented mitigation by avoidance. The key mitigation measure is the avoidance of sensitive hydrological features where possible, by application of suitable buffer zones (i.e. 50m to main watercourses, and 10m to main drains). All of the key development areas (turbines, hardstands, substation, construction compounds etc.) are located significantly away from the delineated 50m watercourse buffer zones except for the upgrading of the existing watercourse crossings, new drain crossings and upgrades to the existing site access tracks. In terms of mitigation by design, there is an extensive network of drains already existing at the 3 no. bogs comprising the Site. The existing drainage infrastructure is operating in accordance with IPC licence requirements, with environmental monitoring and silt control measures being implemented at these bogs. The existing drainage system at the Site will be maintained and expanded locally as required for use within the Proposed Development drainage system. The key elements are the upgrading and improvements to water treatment elements, such as in-line controls and treatment systems, including wind farm related silt traps and settlement ponds. Please refer to Chapter 9 of the EIAR and in particular Section 9.5 which outlines the proposed mitigation measures for hydrological features of the proposed Wind Farm.



Third Party Submission	Response
<u>Curlew Collision & Population Loss:</u> Observers highlight that because the local breeding Curlew population is so small (a single repeatedly occupied breeding pair recorded at Derryhogan Lakes across 2021, 2022, 2023, and 2024), the loss of even a single adult to turbine collision or amenity trail disturbance could lead to the loss of the entire local population, constituting a "Long-term Very Significant effect". Beyond collision risk, observers express significant concern regarding functional habitat loss, displacement, and disturbance from the proposed amenity track bordering Derryhogan Lakes (located approx. 70m from recorded Curlew activity), construction noise, visual intrusion, dogs, and increased public access. Observers emphasise that low modelled collision probability must not mask the extreme severity of losing a species that has suffered a 96% national decline in Ireland.	<u>Curlew Collision & Population Loss:</u> Whilst the CRM results do deal with the impact of turbine collision with Curlew, Chapter 7, Ornithology of the EIAR does assess other measures to protect Curlew. Of particular importance is reducing predator pressure on Curlew. The primary measure proposed to reduce predator pressure on breeding curlew (and other breeding waders and waterbirds) is the installation of permanent predator fencing around Derryhogan Lakes. The fencing will be incorporated into the alignment of the barrier to prevent recreational user and dog access along proposed tracks and trails, and will also extend around the northern and western margins, fully encircling the wetland mosaic at Derryhogan Lakes The implementation of measures to reduce predator pressure on the local curlew population will reduce the potential for loss of a breeding adult to result in loss of the local breeding population by increasing breeding success and recruitment to the breeding adult cohort. With the implementation of measures to reduce predator pressure, potential population-level effects will be offset, resulting in Long-term Moderate residual effects at the scale of the local breeding population, and Long-term Slight effects at the scale of the transient post-breeding and national populations. It is noted that nationwide conservation efforts are underway to reverse the decline of curlew, which, if successful, would reduce the vulnerability and therefore residual effect significance over the lifetime of the proposed development. However, general improvements in the conservation status of the national breeding curlew population have not yet been realised and as such the assessment must adhere to current baseline conditions.



Third Party Submission	Response
<u>Peat Stability & Quality Assurance Discrepancies:</u> Submissions raise significant concerns over document-control and quality-assurance discrepancies in the Geotechnical and Peat Stability Assessment (Appendix 8.1), where summary tables (e.g., Table 7-4 for drained Factor of Safety) list turbine coordinates located far outside the Littleton site. Furthermore, Peat Repository Areas B1 and B2 record "No Information" in stability tables while simultaneously being assigned a "Negligible" risk classification. <u>Rehabilitation Trajectory & Baseline Distortions:</u> Observers submit that the EIAR improperly adopts the post-Phase 1 standard licence-compliance condition (IPC Licence Ref. P0499-01) as the complete environmental baseline without evaluating enhanced rehabilitation options. Bord na Móna documentation confirms that Lanespark was pre-emptively mapped as a constraint due to the wind farm footprint—excluding it from Phase 2 enhanced rehabilitation under the Peatlands Climate Action Scheme (PCAS) while Ballybeg and Derryvella were retained. The applicant must explain whether enhanced rehabilitation alternatives were evaluated or pre-emptively displaced by the commercial layout.	<u>Peat Stability & Quality Assurance Discrepancies:</u> We have reviewed Table 7-3 and Table 7-4 of Appendix 8.1 and notices some typographical errors in the tables . We submit that the turbines coordinates in Table 7-4 are incorrect however the Factor of Safety for Load Conditions are correct. We hereby submit as Appendix 2, and updated Table 7-4 as an Addendum to Appendix 8.1 of the EIAR showing the correct turbine requirements in the updated table. Similarly, both Table 7-3 and Table 7-4 of Appendix 8.1 omitted Condition (1) and Condition (2) of the PRA B1 and PRA B2, this has also been updated in the Addendum to Appendix 8.1 as now contained as Appendix 2 to this submission. It is important to note that these errata's do not impact on the findings of the Peat and Slope assessment stability assessment and consequential Soils and Geology impact assessment contained in Chapter 8 of the EIAR. <u>Rehabilitation Trajectory & Baseline Distortions:</u> The conditions and associated habitats created by the Phase 1 rehabilitation measures which have been implemented form part of the ecological baseline and as such form an inherent component of the baseline environment considered in the impact assessment. The impact assessment fully considers existing and emerging trends associated with the peatland rehabilitation measures that have been implemented at the Site. The rehabilitation measures relevant to the bogs within the site; Littleton (BnM, 2026a), Longfordpass (2026b) and Lanespark (BnM, 2025a) have already been implemented, and no enhanced rehabilitation measures are proposed. Phase 2 enhanced (PCAS) measures are proposed only for nearby bogs outside the site (Ballybeg and Derryvella) (BnM, 2025a).



Third Party Submission	Response
<u>Operational Waste, Fly-Tipping, and Litter Management:</u> Submissions highlight that while the CEMP includes a construction Waste Management Plan, the application completely fails to assess operational waste, litter, plastic pollution, or fly-tipping impacts arising from 4 km of new amenity trails, public access, and parking facilities. Local residents provide photographic evidence from community clean-ups (2022–2024) demonstrating persistent, unresolved illegal dumping along bog roads and access points. Observers request a dedicated Operational Litter and Fly-Tipping Prevention Plan, CCTV enforcement, and defined operational funding responsibilities before consent is considered.	<u>Operational Waste, Fly-Tipping, and Litter Management:</u> By its nature the proposed wind farm will not generate waste or litter. Any contractors carrying out servicing on turbines etc will remove any waste generated from site. The EIAR has extensively considered waste associated with the proposed development, in Appendix 4.1 CEMP.
Item 2: Landscape, Visual Amenity, and Cumulative Impact <u>Scale and Tip Height Objections:</u> Observers object to the introduction of 11 wind turbines with a blade-tip height of 200 metres, citing visual prominence, blade movement, aviation lighting, and the overall "perceived industrialisation of the countryside".	<u>Scale and Tip Height Objections:</u> Refer to Chapter 13 (Landscape and Visual Impact) of the EIAR for assessment of the proposed development in terms of visual impact. This states: <i>"Overall, the Proposed Development will result in a noticeable degree of visual change within the central study area for local community receptors. While the turbines are prominent from some of the nearest receptors, they are well accommodated within this extensive landscape, which comprises broad underlying land uses such as the expansive areas of peat bog. The proposed turbines are also well offset from nearby receptors and comply with the draft Wind Energy Development Guidelines' visual amenity offsets. Even in the context of more distant views, the turbines do not block or heavily obscure views, due to their slender form and loose arrangement, which allows for a strong degree of visual permeability through the array. As a result, residual visual effects at local community receptors are assessed as Not Significant."</i>



Third Party Submission	Response
<u>Landscape Saturation & Proliferation:</u> High concentration of existing, consented, or proposed wind farms in the surrounding landscape (e.g., Lisheen, Tullaroan, Monahincha, Ballincurry, Gurteen, Knocknamuck, Farranrory, Kill Hills, Ballybay, Brittas, Foyle, Bruckana, and local private turbines), totalling up to 128 turbines within 20 km and over 80 turbines in the immediate surrounding area. Observers contend the region suffers from severe wind farm proliferation and ask whether the landscape can sustainably accommodate another 11 turbines.	<u>Landscape Saturation & Proliferation:</u> Chapter 13 of the EIAR assessed the cumulative landscape and visual assessment. Section 13.9 dealt with the cumulative assessment, which included all existing, consented, and in-planning wind farms within the 20 km study area following NatureScot guidelines. The study area comprises existing wind farms, consented wind farms and proposed (in planning) wind farm developments. As a result, the cumulative assessment of wind farm developments within the study area will be broken into two categories; the current cumulative scenario and the potential future cumulative scenario. The current cumulative scenario will assess the cumulative effect of the Proposed Development in respect of existing wind farm developments and consented wind farm developments. It is considered that the proposed Littleton Wind Farm would contribute to a cumulative impact of Medium magnitude in the context of the current cumulative scenario. The Proposed Development is well offset from those parts of the study area with the highest concentrations of existing turbines and, as such, would not materially intensify established wind farm clusters. Whilst the development would increase the prominence, scale and extent of wind energy development within the study area, it would do so within a robust, working rural landscape and would, in most instances, be perceived as a distinct grouping in relation to other existing and consented wind farms. As a result, cumulative landscape and visual effects arising under the current cumulative scenario are assessed as Not Significant.



Third Party Submission	Response
<u>Omission of Key Local Viewpoints & Inadequate EIA Assessment:</u> Observers have stated that the LVIA has omitted direct key community views like Gortnahoe village and Longfordpass, instead using irrelevant viewpoints like Johnstown cemetery. Submissions explicitly highlight the total omission of designated and culturally vital vantage points, including Glengoole / New Birmingham village (elevated 50m above the site) and the Reen Road Picnic and Viewing Area (the only designated elevated viewing point on the Slieveardagh Hills at 253m OD, offering 180° panoramic vistas).	<u>Omission of Key Local Viewpoints & Inadequate EIA Assessment:</u> Viewpoint Reference Points (VRPs) were selected in accordance with GLVIA3 methodology to capture sensitive receptors, designated views, and community settlements within the 20 km study area. Key local community settlements, elevated vantage points, and designated amenity/scenic routes were evaluated using bare-ground and augmented Zone of Theoretical Visibility (ZTV) mapping, combined with Route Screening Analysis (RSA) and photomontages, ensuring a robust and comprehensive assessment of visual baseline conditions. It is not warranted to include each and every location that provides a view of this development as this would result in an unwieldy report and make it extremely difficult to draw out the key impacts arising from the project. Instead, a variety of receptor locations was selected that provide representative views of the proposed wind farm from different distances, different angles and different contexts. Please refer to EIAR Chapter 13 (Landscape and Visual Impact); EIAR Volume 5 (Photomontage Booklet).
<u>Direct Conflict with County Development Plan Landscape Policies:</u> Observers have prepared independent 3D visual modelling and photomontages that provide their argument that the project violates Tipperary County Development Plan 2023–2028 Policies 11-16 and 11-17 by introducing severe visual disharmony, clutter, and "Very High" cumulative adverse effects over the last remaining bogland vista in Tipperary without wind turbines.	<u>Direct Conflict with County Development Plan Landscape Policies:</u> The proposed wind farm site is located entirely within an area designated as "Open for Consideration" for wind energy development under the Tipperary County Development Plan / Renewable Energy Strategy. Chapter 13 (LVIA) of the EIAR has been prepared by MacroWorks, who are a landscape consultancy firm specialising in Landscape and Visual Impact Assessment (LVIA) of development projects and one of the only companies in Ireland wholly dedicated to LVIA and associated mapping and visualisations. Established in 1999, Macro Works provide a full suite of visual assessment, analysis, GIS mapping and simulation tools for all aspects of energy (wind, solar, transmission lines, sub-stations, power generation facilities, hydro dams), civil engineering infrastructure and commercial developments.



Third Party Submission	Response
<u>Shadow Flicker Controls:</u> Concerns regarding shadow flicker effects on nearby dwellings and request for mandatory "automatic turbine shutdown controls". Dispersed / Two-Part Layout Effects: Observers highlight that dwellings positioned between the separated Lanespark group (T9–T11) and the principal Littleton array experience an enlarged, multi-directional visual envelope and "visual tension," rather than facing a single, compact turbine array.	The LVIA has been prepared using Guidelines on Landscape and Visual Impact Assessment (GLVIA3) , which follows the European Landscape Convention (ELC) definition of landscape. <u>Shadow Flicker Controls:</u> A full shadow flicker assessment was conducted, the study area for this assessment has therefore been determined based on a two-stage process. The first stage considers a maximum distance of 1,620 m (10 x 162 m rotor) from each of the wind turbines. There is the potential for shadow flicker at up to 35 receptors surrounding the site, based on a worst-case scenario where no mitigation measures are adopted. Mitigation for Shadow Flicker is addressed in Section 12.5 of the EIAR. Littleton Wind Farm DAC will provide protection from shadow flicker by committing to curtailing turbines for all instances where shadow flicker effects are reported to occur at residential dwellings within 10 rotor diameters of the turbines. Shadow flicker occurrence will be identified following reports or complaints of shadow flicker from receptors within 10 rotor diameters of the turbines. A Complaints Investigation Procedure will be agreed with the Local Authority prior to the Proposed Development becoming operational, which will set out the steps to be followed in the event that shadow flicker related complaints are received. Once reports of shadow flicker have been validated (confirmed via software model that shadow flicker can occur at the receptor at the reported time), mitigation will be implemented for all instances of shadow flicker occurrence at that receptor. However, it should be noted that when the conditions for shut down due to shadow flicker are met, there is a short period of time before complete shutdown occurs, as the turbines gradually slow down and stop turning. This will depend on the reaction time of the shadow flicker control modules and the particular turbine type, as well as the rotational speed at which the turbine is stopping from, and is likely to be within the scale of several seconds to around a minute.



Third Party Submission	Response
Inconsistencies in Alternatives Assessment: Observers point out internal inconsistencies in EIAR Chapter 3 (Table 3-7), where site comparative options refer to "mountain ridgelines," "topographical mountain basins," "rocky environments," and claims of "no telecommunication links or aviation in the area," despite the site being flat peatland with 15 identified radio links. Furthermore, the final 11-turbine design iteration (DI4) is omitted from the comparative environmental matrix in Table 3-7.	Accordingly, the Applicant would accept a condition to enact appropriate shadow flicker mitigation if and when it is required. <u>Inconsistencies in Alternatives Assessment:</u> The EIAR documents the full iterative design history across four major milestone design iterations (DI1 to DI4) and intermediate layouts in Chapter 3. High-level descriptions in Table 3-7 summarise early option considerations for DI 1 to 3. leading to the final 11-turbine frozen layout (DI4). Identified radio links and aviation constraints were fully integrated into the detailed design constraints mapping. We would additionally highlight that the inconsistency highlighted in Chapter 3 by the observers are respectfully submitted to not materially alter the findings of the Chapter or EIAR.
Item 3: Residential Amenity, Proximity, Noise, and Health <u>Proximity & Visual / Noise Intrusion:</u> Dwellings located as close as 800m to 1,000m from proposed turbines face elevated noise, low-frequency sound, amplitude modulation, and visual intrusion. Multiple local residents note having up to four 200m turbines sited within approximately 1.7km to 2.0km of their homes.	<u>Proximity & Visual / Noise Intrusion:</u> Chapter 13 of the EIAR deals with the visual impact of the proposed wind farm. In terms of amplitude modulation, as noted in Chapter 11 (Noise and Vibration) of the EIAR, at present there is no method for predicting AM at any particular location before turbines begin operation based on the general features of a site or the known attributes of a particular turbine. Therefore, it is not possible to predict an occurrence of AM at the planning stage. It should also be noted that it is a rare event associated with a limited number of wind farms. While it can occur, it is the exception rather than the rule. The RenewableUK study states that <i>"even on those limited sites where it has been reported, its frequency of occurrence appears to be at best infrequent and intermittent."</i>, and <i>"There is nothing at the planning stage that can presently be used to indicate a positive likelihood of OAM occurring at any given proposed wind farm site, based either on the site's general characteristics or on the known characteristics of the wind turbines to be installed."</i>



Third Party Submission	Response
<u>Verified Proximity & Spatial Encirclement:</u> Specific spatial analysis submitted for local residences (e.g., Rafter family house, Derryvella / R303) confirms severe multi-directional turbine encirclement: 4 turbines within 2 km (nearest T10 at 1,592m, T9 at 1,659m, T11 at 1,780m, T8 at 1,995m), 7 turbines within 3 km, 9 turbines within 4 km, and all 11 turbines within 5 km. The turbines encompass bearings spanning from the south-west to the north/north-north-east, creating a dominant visual and acoustic presence around family homes and agricultural holdings.	Section 11.6.2.1.1 of EIAR Chapter 11 outlines mitigation that can be implemented in the event of proven operational amplitude modulation. The Applicant would accept a condition to the effect of this EIA section to deal with this. Low frequency noise is noise that occurs within the frequency range of 10 Hz to 160 Hz as defined in NANR45: Procedure for assessment of low frequency noise, Salford University Report. Section 11.2.4 of EIAR Chapter 11 deals with low frequency noise, quoting Institute of Acoustics findings which state that the IOA is aware that there is some information presented at planning inquiries suggesting the potential for physiological health effects from low frequency noise from wind turbines. It is current advice to members that there is no need to assess low frequency noise as part of the noise impact assessment process, as the absolute levels, whilst potentially audible at typical receptor distances, are well below those reported to trigger physiological health effects based on peer reviewed research to date." Therefore, the assessment of infrasound and low frequency noise are well below the level reported to trigger physiological health effects. <u>Verified Proximity & Spatial Encirclement:</u> Spatial distribution of the 11 turbines was configured to ensure proper array alignment and separation across the developable site areas. The operational noise study area included all residential dwellings within the 35 dB L_{A90} contour (the lowest limit prescribed in the 2006 DoEHLG Wind Energy Development Guidelines). Detailed noise modeling using ISO 9613-2 / IOA Good Practice Guide methodology accounts for multi-directional turbine positioning under worst-case downwind propagation conditions.



Third Party Submission	Response
Baseline Noise Survey Gaps & Outdated Data: Observers highlighted that it has Furthermore, background noise surveys conducted in late 2021 (over 4 years old) do not reflect current 2026 baseline conditions. Observers note that "atypical" noise data was excluded from monitoring location N4 without clear source identification, and cumulative noise calculations failed to incorporate audible industrial noise from the nearby active plastics-recycling operation at the former Bord na Móna briquette factory site.	Chapter 11 of the EIAR concludes that no mitigation is proposed to control operational noise from the wind farm site. Based on the predicted noise levels, a new noise source will be introduced into the acoustic environment and it is expected that there will be a long term slight to moderate effect for dwellings within the 35 dB LA90 study area with a moderate significance of effect on the closest dwellings to the Proposed Wind Farm. No mitigation is proposed for the substation. Operational noise from the substation is predicted to be below the level that would lead to an adverse effect. Baseline Noise Survey Gaps & Outdated Data: Baseline noise surveys were conducted directly by qualified acoustic engineers between 18th November and 7th December 2021 across six representative noise-sensitive locations (N1 to N6) surrounding the site boundary. Data filtration adhered strictly to ETSU-R-97 and IOA Good Practice Guide methodologies: periods affected by rainfall, dawn chorus, and atypical site-specific noise sources were identified and systematically screened out to derive valid background polynomial curves. Appendix 11.1 outlines the results of the noise surveys. It was not considered necessary to do more updated noise surveys, based on the background noise levels found from the 2021 surveys.



Third Party Submission	Response
<u>Requests for Independent Noise & Structural Monitoring:</u> Submissions request independent site-specific baseline and operational noise monitoring, enforced night-time noise limits, automatic curtailment procedures, pre-blasting structural surveys, and peak particle velocity (PPV) vibration thresholds in line with EPA guidelines.	<u>Requests for Independent Noise & Structural Monitoring:</u> Site-specific operational noise limits have been derived for all nearby sensitive receptors in full accordance with the 2006 Wind Energy Development Guidelines, ETSU-R-97, and IOA Good Practice Guide recommendations. Compliance with the daytime limits ($40\text{--}45\text{ dB } L_{A90,10min}$) and night-time fixed limit ($43\text{ dB } L_{A90,10min}$) will be enforced, with operational blade pitch regulation or turbine curtailment measures implemented if required to maintain full compliance. Construction and decommissioning activities will adhere to BS 5228-1:2009+A1:2014 criteria ($65\text{ dB } L_{Aeq,1hr}$ daytime limit). Detailed vibration assessments establish that operational and construction ground-borne vibration levels at nearest sensitive receptors remain significantly below human perception thresholds and far below building damage or structural thresholds, eliminating the need for operational vibration monitoring. Refer to EIAR Chapter 11 (Noise and Vibration) for more details. Please also note that no blasting is proposed as part of this development.
<u>Impact on Vulnerable Residents & Neurodivergent Children:</u> Specific objections highlight severe health risks to residents with acquired brain injuries and medical conditions such as hyperacusis, light sensitivity, balance impairment, and cognitive processing restrictions. Furthermore, submissions detail the acute negative impact of continuous blasting, heavy machinery noise, rock breaking, and HGV traffic on neurodivergent children (e.g., children diagnosed with dyslexia), who rely on a quiet, predictable home environment for home study and well-being.	<u>Impact on Vulnerable Residents & Neurodivergent Children:</u> Refer to EIAR Chapter 11 (Noise and Vibration) as well as Chapter 5 (Population and Human Health). Potential health, low-frequency sound, and acoustic impacts on local receptors were evaluated against relevant international and national guidelines. Published peer-reviewed research and position statements from the Institute of Acoustics (IOA, 2024) and World Health Organisation (WHO) establish that infrasound and low-frequency noise from modern wind turbines are significantly below human perception thresholds and well below levels reported to trigger physiological or health effects. Construction noise impacts are short-term, temporary, and subject to strict daytime limits ($65\text{ dB } L_{Aeq,1hr}$) and best-practice mitigation measures under BS 5228-1 to minimise disturbance to local communities. Please note that no blasting is proposed as part of this proposed development.



Third Party Submission	Response
<u>Impact on Private Water Supplies & Water Table Drawdown:</u> Observers dependent on private drinking wells and local group water schemes (e.g., a scheme serving 12 homes at Longford Pass / Fennor) have outlined concerns with impact of the proposed development on ground water. Deep excavation, rock blasting, and quarrying risk intercepting the local water table—creating a drawdown effect that could dry up private wells, open bedrock fractures, divert critical hydrogeological pathways, or contaminate supplies with silt, heavy metals, and chemical residues from explosives. Observers request mandatory hydrogeological impact assessments, baseline well testing, and legally binding remediation bonds.	<u>Impact on Private Water Supplies & Water Table Drawdown:</u> The design and layout of the Proposed Wind Farm prevent adverse impacts on local hydrogeological pathways, private wells, and group water schemes, such as the Longford Pass / Fennor supply (EIAR Chapter 9). Comprehensive site investigations—including trial pitting, peat probing, and rotary core drilling—confirm low-permeability subsoils and shallow groundwater seepages (EIAR Chapter 8). Consequently, turbine foundations require only shallow excavations, avoiding deep bedrock excavation, blasting, and dewatering (EIAR Chapter 8). Material extraction at the proposed borrow pit will occur strictly above the water table without dewatering or chemical blasting residues, eliminating localised drawdown, bedrock fracture propagation, and heavy metal mobilisation (EIAR Chapter 8). Generous separation distances protect nearest receptors, while a project-specific Surface Water Management Plan (SWMP) featuring SuDS, siltation controls, and interceptors safeguards raw water quality (EIAR Chapter 9; Appendix 9.3). Pre-construction baseline testing and continuous monitoring of local wells will guarantee supply integrity (EIAR Chapter 9). Please note that no blasting is proposed as part of this proposed development.
Item 4: Archaeology, Local Cultural Heritage, and Historic Sites <u>Pollen Record & Ice Age Heritage:</u> Observers noted the historical and scientific importance of Littleton Bog, noting that it gave its name to the Irish "Littletonian" period and contains a significant peat and pollen record dating back to the end of the last Ice Age.	<u>Pollen Record & Ice Age Heritage:</u> Please refer to Chapter 14 (Archaeological, Architectural and Cultural Heritage) of the EIAR. Baseline desktop and field evaluations associated with this acknowledged the regional environmental and historical context of Littleton Bog. The layout of the proposed development was informed by archaeological desktop assessment and fieldwork undertaken during the design and assessment phases.



Third Party Submission	Response
	A suitably qualified archaeologist will be employed to monitor construction phase ground works, including advance geotechnical investigations, turbine foundations, site access tracks (including profiling for floating roads), cable trenches, compounds, under licence by the National Monuments Service (NMS) of the Department of Housing, Local Government and Heritage within overgrown areas of the Site. This will include archaeological supervision of vegetation clearance works and inspection of cleared areas in advance of ground excavation works within the Site. In the event that any archaeological sites, features or objects are identified during monitoring of ground works will halt at the relevant location, and the archaeological remains will be securely cordoned off and recorded. The NMS will then be notified and consulted to determine further appropriate mitigation measures, which may include preservation in situ by avoidance or preservation by record through a systematic, licensed archaeological excavation. <u>Impact on Cultural Landscapes & Historic Monuments:</u> A comprehensive Landscape and Visual Impact Assessment (LVIA) is included in EIAR Chapter 13 and cultural heritage appraisal contained in EIAR chapter 14. These chapters evaluated potential visual and setting effects on surrounding historic monuments, key viewpoints, and cultural assets within the wider landscape



Third Party Submission	Response
<u>Impact on Cultural Landscapes & Historic Monuments:</u> Potential damage and loss of visual setting for local historic sites, viewpoints, and tourist landmarks, including Kilcooley Abbey, Grange walk, Wellington Monument, Derryvilla Lake, Boulick Motte and Bailey, The Reen viewing point (and adjacent Druid's Altar), Littleton Labyrinth, and the Derrynaflan Monastic Site.	Chapter 13 states: <i>"Several of the most notable heritage and amenity features are located within the wider study area. War House Hill and Kilcooley Abbey, to the east and northeast of the proposed wind farm respectively, are entirely screened from the turbines by dense intervening vegetation. Similarly, Holycross Abbey, located to the west, is well contained from the proposed turbines by dense mature intervening vegetation. The Rock of Cashel, one of the most visually and historically sensitive heritage assets within the study area, lies approximately 17 km southwest of the proposed turbines and is entirely screened by intervening terrain.</i> <i>Overall, the study area contains a variety of sensitive and visually susceptible tourism, heritage, and amenity assets with the potential to afford views of the proposed wind farm. While some notable visual effects will occur at the nearest of these receptors, the turbines do not appear overbearing and will not significantly detract from their visual setting. Consequently, it is assessed that residual visual effects at surrounding heritage and amenity features within the study are Not Significant."</i>



Third Party Submission	Response
<u>Derrynaflan Hoard Significance:</u> Observers emphasise the cultural significance of the wider wetland landscape associated with the discovery of the Derrynaflan Hoard (including the Derrynaflan Chalice).	<u>Derrynaflan Hoard Significance:</u> The historical, archaeological, and cultural significance of the Derrynaflan Monastic Site and its surrounding wetland context are fully recognised within the baseline environment. Chapter 14 of the EIAR assesses the impact of the development on this. In terms of a visual impact, the proposed development would have a moderate, negative long term impact on this. The closest turbines to this are Turbines 9, 10 and 11 are located 3.6km to 3.7km to the northeast .
<u>Unrecorded Burial Grounds (The Disheen):</u> Concern for unrecorded heritage, specifically the approximate location of the Disheen—"a burial ground associated traditionally with unbaptised babies". Observers request that "no ground-disturbing works take place in an area where there is a reasonable possibility of affecting the Disheen".	<u>Unrecorded Burial Grounds (The Disheen):</u> Refer to Chapter 14 of the EIAR which completed an extensive desktop review, consultation process, and field inspection regime to identify recorded and unrecorded cultural heritage assets. To protect potential unrecorded heritage—including local vernacular sites or unrecorded burial areas such as The Disheen—advance non-intrusive geophysical surveys, targeted test excavations, and continuous archaeological monitoring of all ground-disturbing activities will be carried out under licence by a qualified archaeologist during construction. In the event that any previously unrecorded archaeological remains or skeletal material are encountered, works in the immediate vicinity will cease immediately pending consultation with the National Monuments Service (NMS) and National Museum of Ireland (NMI).



Third Party Submission	Response
Item 5: Recreational Amenity, Tourism, and Strategic Land Use <u>Impact on Existing Amenities & Loop Walks:</u> Potential negative impacts on local amenities, nature walks around Lough Doire Bhile / Doire Bhile (including visual intrusion within 0.7 km of turbine T10), bird watching, and future greenway/recreational routes. <u>Call for Strategic Land-Use Planning vs. Commercial Exploitation:</u> Call for a "long-term strategic development and land-use plan for the former Bord na Móna peatlands" rather than piecemeal commercial development, arguing that future land use should prioritise nature-based alternatives, restoration, public access, and genuine community-led post-peat transitions.	<u>Impact on Existing Amenities & Loop Walks:</u> Chapter 13 (Landscape and Visual Impact Assessment) thoroughly assessed the impact of the proposed development on surrounding recreational and tourism assets. As detailed at Viewshed Reference Point 27 (VP27) of Chapter 13, the Lough Doire Bhile Loop Walk is located approximately 700 m from turbine 10. The visual effect of VP27 is deemed to be Substantial-moderate / Negative / Long Term, but not significant. <u>Call for Strategic Land-Use Planning vs. Commercial Exploitation:</u> The Tipperary County Development Plan 2022 - 2028 outlines a long-term strategic vision for the administrative area of Tipperary County Council, including the proposed development site. The CDP identifies the Proposed Development as being located in an area open to consideration for Wind Energy. As such, the Proposed Development is aligned with the general long-term vision of the County Council. Furthermore, as outlined in the submitted EIAR the proposed wind farm is located on the Littleton bog group. As such, the site has been the subject of industrial scale peat extraction which ceased in 2017. As part of the rehabilitation process, the site is now subject to a series of Rehabilitation Plans. The focus of these plan are to rehabilitate the site and regenerate bog and other habitat types across the site. The Proposed Development has incorporated these plans, which focus on the ecosystem and natural environment, into the overall proposal as outlined in the submitted BEMP and Chapter 6. In conclusion, the Proposed Development is situated within a series of longer term, strategic visions for the site and the county as a whole and makes a positive contribution towards both items, which have a strong emphasis on the natural environment.



Third Party Submission	Response
<u>Conflict with Smart Village Regeneration & Rural Business:</u> Submissions on behalf of local businesses (e.g., O'Braonains Public House / Brennan's Pub in Glengoole) highlight that transforming the surrounding countryside into an industrial energy corridor directly conflicts with active Smart Village regeneration plans, local loop walks, traditional music culture, and eco-tourism initiatives that rely on rural tranquillity and landscape charm.	<u>Conflict with Smart Village Regeneration & Rural Business:</u> The Applicant fully acknowledges the concerns of the local businesses, especially with regards to tourism pertaining to the surrounding loop walks, natural environment and landscape. Section 5.7.11 of Chapter 5 of the EIAR (Population and Human Health) outlines research into the effect of wind farms on tourism. This indicates that wind energy infrastructure in Irish rural and/or bog landscapes does not inherently compromise local tourism or eco-tourism initiatives. As such, and as concluded in the EIAR, the Proposed Development will not have a significant impact on the tourism amenities in the area.
Item 6: Electrical Grid Capacity, Energy Curtailment, and Data Centres <u>Grid Capacity & Energy Waste:</u> Observers question grid capacity to support new turbines, citing media reports that "15% of Ireland's most affordable electricity was wasted in the first six months of 2026 because the existing grid was not strong enough".	<u>Grid Capacity & Energy Waste:</u> The Applicant acknowledges the publication by Wind Energy Ireland on 28th of June stating that 15% of energy generated by wind farms was lost as the grid wasn't strong enough to carry it. This in itself underpins the importance of the national policy frameworks and EirGrid assessments highlighting the necessity of expanding renewable infrastructure to support grid capacity, reduce curtailment, and meet legally binding targets under the Climate Action Act 2021 and Climate Action Plan (CAP24/25). With regard to the observers' question of grid capacity to accommodate the Proposed Development, initial feasibility studies were conducted and grid capacity to accommodate the Proposed Development was confirmed at an early stage. Although the grid connection will be the subject of a separate Application, it will also enhance the grid infrastructure and connectivity in Tipperary. Furthermore, even if c. 15% of the energy generated by the Proposed Development annually was lost due to grid shortcomings it would still deliver c. 58MW of locally generated, renewable energy to the national grid. This would still be enough to power approximately 38,170 Irish Households annually marking a significant contribution towards Ireland's climate targets and commitments.



Third Party Submission	Response
<u>Dispatch-Down & Corporate Benefit:</u> Concerns raised whether output will be subject to dispatch-down/curtailment or if the infrastructure primarily serves corporate data centres rather than providing effective national energy benefits.	In conclusion, the Design Team and Applicant identified the grid capacity for the Proposed Development at an early stage making it feasible to bring a Planning Application forward. Even if power was lost due to grid issues, it would still mark a significant contribution towards Ireland's Climate targets <u>Dispatch-Down & Corporate Benefit:</u> The project aligns with Project Ireland 2040 and Regional Spatial and Economic Strategy (RSES) objectives to accelerate Ireland's low-carbon transition. While dispatch-down and network management are controlled directly by EirGrid, operational output directly displaces fossil fuel generation, cuts national greenhouse gas emissions, and helps meet statutory 2030 targets. The energy generated from the Proposed Development will be delivered to the national grid for use as required. EIAR Reference: Chapter 2 (Background to the Proposed Development).



Third Party Submission	Response
<u>Requirement for Proof of Net System Benefit:</u> Observers request that the applicant prove the actual net electricity-system benefit and available capacity of the project relative to the environmental and community burden imposed.	<u>Requirement for Proof of Net System Benefit:</u> As detailed in the submitted EIAR a clear net positive environmental and socio-economic impact is identified. Comprehensive carbon, air quality, hydrology, and biodiversity assessments demonstrate that zero-carbon generation significantly outweighs the construction impacts. A net positive ecological impact is also achieved through the proposed BEMP. EIAR Reference: Chapter 2 (Background to the Proposed Development).
Item 7: Construction Traffic, Road Safety, and Infrastructure <u>Narrow Rural Networks & HGV Impacts:</u> Heavy HGV traffic, delivery of abnormal turbine loads, narrow rural roads, potential removal/disruption of property boundary walls, roadside collapse, rutting, and long-term road maintenance concerns under heavy axle loads. <u>Traffic Management & Special Infrastructure Contributions:</u> Requests for strict planning conditions, detailed Traffic Impact Assessments (TIA), Traffic Management Plans covering road repair, boundary reinstatement, dust suppression, local access maintenance, and funding via Special Infrastructure Contributions under the Planning Acts.	<u>Narrow Rural Networks & HGV Impacts:</u> As outlined in the submitted EIAR an extensive analysis of the Turbine Delivery Route, delivery of abnormal loads and haul routes was conducted. As concluded, the Proposed Development will not give rise to any significant impacts on the local road network. This was achieved through extensive analysis of the local road network, using the motorways, national and regional roads as much as possible, and controlling the traffic flows through the 6 no. site access points (for example not permitting general construction traffic through Site Access Points 5 or 6 and not allowing component deliveries, oversized loads or HGVS through access point no. 1). All roads will be reinstated following completion of the Proposed Development and the Applicant is happy to accept a condition to this effect. <u>Traffic Management & Special Infrastructure Contributions:</u> As outlined in Chapter 15 of the EIAR, an extensive assessment of the traffic and transport environment undertaken. This included the preparation and submission of a Traffic Management Plan (TMP) as part of Appendix 4.1. As concluded, the Proposed Development will give rise to no significant impacts. Tipperary County Councils and An Garda Síochána will be consulted as necessary for abnormal load delivery under Garda escort.



Third Party Submission	Response
<u>Cul-de-Sac & Residential Road Safety Hazards:</u> Observers highlight acute traffic conflicts on narrow tertiary roads, cul-de-sacs, and quiet lanes (e.g., Church Road, Fennor, and Longfordpass lanes). Mixing heavy construction plant, quarry HGVs, commercial bale haulage, and visitor traffic to Lough Doire Bhile creates severe safety risks for local residents, pedestrians, cyclists, and children, while threatening to obstruct emergency vehicle access. <u>Grid Connection Trenching & Public Road Integrity:</u> Concerns are raised regarding the 30.9 km underground 110 kV grid connection route (28.4 km within public roads) requiring approximately 70 cable joint bays (67 in public roads). Observers request detailed assessments of structural loading, repeat trenching, differential settlement, edge support, and long-term road pavement integrity before consent, citing planning precedents (e.g., Maighne Wind Farm PA09.300746).	Any trenching works will utilise rolling lane closures via statutory road opening licenses, with full pavement reinstatement per Department of Transport guidelines (The Purple Book). Although it is of significance to note that the grid connection will be the subject of a separate planning application. <u>Cul-de-Sac & Residential Road Safety Hazards:</u> Access junctions meet TII standards (DN-GEO-03060), providing 120m (60 km/h) and 215m (100 km/h) visibility splays. Local roads like the L4114 (Access Points 4 and 5) restrict routine traffic to light vehicles, using Access Point 4 only as a controlled HGV crossover. General HGVs are banned from using narrow tertiary accesses (Access Points 4, 5, 6) for site egress. Stop/go systems and flagmen will ensure continuous local and emergency access. <u>Grid Connection Trenching & Public Road Integrity:</u> The grid connection will be the subject of a separate planning application. However, as detailed in the submitted EIAR, it complies with all the appropriate EirGrid, TII, and Department of Transport specifications, legislation and guidance.
Item 8: Public Consultation and Direct Community Engagement <u>Inadequate Direct Notification:</u> Lack of direct notification to impacted residents living in immediate localities (e.g., Clonamondra, Gortnahoe, Ballysloe, Leigh, Two Mile Borris, Fennor). Observers argue general online notices and websites are an inadequate substitute for direct engagement.	<u>Inadequate Direct Notification:</u> As detailed in Chapter 2 of the submitted EIAR, an extensive public consultation process was undertaken as part of the Project. This included: the appointment of a Community Liaison Officer (CLO) in April 2021 that was contactable via phone and email to approximately 490 householders within a 2 km radius of the site; setting up a project website to publish the latest available information from the design team; letter and information pack drops; door-to-door to local householders in September 2025; and public information events in October 2025 to enable direct engagement with the project team. During 2021, in light of the public health restrictions, virtual consultation sessions were also held.



Third Party Submission	Response
<u>Lack of Specific Near-Neighbour Benefit Details:</u> Observers note that while a Near Neighbour / Community Benefit Fund (€5.5 million over 15 years) is promoted, the application lacks transparent, specific details regarding prescribed eligibility distances, annual electricity contributions, retrofit grant amounts, or guarantees for households bearing the highest direct impacts.	The Applicant remains committed to continued public consultation, and will have a CLO appointed throughout the remainder of the project life cycle and communicate updates as appropriate. <u>Lack of Specific Near-Neighbour Benefit Details:</u> The Community Benefit Fund operates under the Department's updated Community Benefit Rulebook (2025) and is administered by a Fund Committee comprising community volunteers, the developer, and an administrator. The fund, including the Near Neighbour Scheme mentioned in the observations, will be set up once the Proposed Development is constructed, should it receive Planning Permission. At this point, further information will be circulated to the local community on the fund, its composition and its benefits for the local community. The overall fund is valued at €2/MWh generated, estimated at €5.5 million over its first 15 years based on an annual output of 185,204 MWh. At least 40% of the funds are mandated to support non-profit community enterprises targeting UN Sustainable Development Goals 4, 7, 11, and 13.
<u>Separation of Community Benefits from EIAR Planning Assessment:</u> Submissions emphasise that proposed community funds or financial schemes cannot be treated as a substitute for thorough environmental assessment or as compensation for unacceptable loss of residential amenity, health impacts, or landscape degradation.	<u>Separation of Community Benefits from EIAR Planning Assessment:</u> The Proposed Community Benefit Fund and financial support schemes do not constitute a replacement to comprehensive environmental assessment and are treated entirely separate. The Community Benefit fund in Ireland is intended to ensure that local communities share the benefits of renewable energy developments by providing funding for economic, environmental, social and cultural projects in areas hosting renewable energy infrastructure. It originates from the Renewable Electricity Support Scheme (RESS) and supporting Community Benefit Fund Rulebook issued by the Department of Climate, Energy and the Environment. This fund would be established following obtaining planning permission and the construction of the Proposed Development.



Third Party Submission	Response
	In conclusion, the Community Benefit does not replace comprehensive environmental assessment but accompanies it. The submitted EIAR is extensive, comprehensive and in line with all required legislation and best practice guidance but most significantly carried out in accordance with the EPA Guidelines on Information to be contained in Environmental Impact Assessment Reports.
Item 9: On-Site Borrow Pit / Quarry Operations <u>Proximity to Dwellings & Boundary Encroachment:</u> Strong objections are raised against the proposed on-site construction borrow pit/quarry (Longfordpass North & South) and associated drainage. Dwellings (such as R303) and residential boundaries are situated less than 200m from the ditch boundary/borrow pit, with direct, unmitigated visual exposure from residential rear windows. <u>Blasting, Shockwaves, Noise, Dust, and Health Risks:</u> Concerns have been raised regarding rock blasting shockwaves, rock breaking, crushing, screening, continuous heavy machinery operations, ground-borne vibration, and fine silica dust emissions. Observers highlight severe acoustic disturbance in a quiet rural baseline, health risks from dust inhalation, extreme disruption to home study for children, and loss of quiet enjoyment of property.	<u>Proximity to Dwellings & Boundary Encroachment:</u> The Applicant's acknowledge the concerns of visual impact from the borrow pit on nearby residential receptors. As outlined in the submitted EIAR, the borrow pit will be surrounded by a 2m high bund with an acoustic barrier on top of it to mitigate any potential noise related impacts from it. This will provide visual screening from any of these receptors. Furthermore, specific design, operational, and environmental management protocols set out in the project Construction and Environmental Management Plan (CEMP) will be implemented to safeguard residential amenity at surrounding dwellings. <u>Blasting, Shockwaves, Noise, Dust, and Health Risks:</u> With regard to rock blasting, as outlined in Chapter 8 of the submitted EIAR, blasting of rock will not be permitted and therefore none of the impacts associated with same will occur. The noise modelling that forms the basis of the submitted noise chapter, deals extensively with the borrow pit area and the impacts arising from activities within. It is based on the BS 5228-1 criteria and indicates that cumulative daytime construction noise levels will remain below the standard limit of 65 dB $L_{Aeq,1hr}$ at the nearest sensitive receptors (R302 and R303) once mitigation measures are applied. These mitigation measures include, inter alia, the erection of a noise barrier on top of a c. 2m tall bund and to prevent cumulative acoustic impacts, operations at the main borrow pit and the northwest section of the borrow pit will not occur simultaneously.



Third Party Submission	Response
<u>Unnecessary Extraction & Nearby Licensed Commercial Quarries:</u> Observers establish that the proposed borrow pit is entirely unnecessary given the immediate availability of established, licensed commercial quarries—specifically Maher's Quarry (approx. 10 minutes away) and Roadstone Killough (approx. 19 minutes away) with direct access to the N8 national route. The observers opine that the applicant has failed to justify why rock cannot be sourced commercially to avoid local extraction impacts.	A number of submitted documents address concerns regarding air quality. The two most prominent documents are Chapter 10 - Air Quality and Climate and the CEMP (Appendix 4.2, Volume 3). In a similar way to the noise chapter, they address the proposed borrow pit as part of the overall assessment and conclude that no significant impacts will arise as a result of it. Within the CEMP, a number of operational control and dust suppression measures are detailed which will manage fugitive dust emissions during excavation and earthmoving. These measures include the implementation of wheel washing as well as covering loads prior to their transportation off site (as required). In conclusion, whilst the Applicant acknowledges observers concerns relating to the borrow pit and associated impacts, these have been submitted extensively in the submitted EIAR and appropriate mitigation measures have been implemented to ensure that no significant impacts will arise from the Proposed Development. <u>Unnecessary Extraction & Nearby Licensed Commercial Quarries:</u> The inclusion of an on-site borrow pit is designed directly as an environmental mitigation strategy to minimise off-site construction traffic and external road network disruption. By sourcing bulk aggregate and stone directly on-site, HGV haulage trips on the public road network are significantly reduced, lowering associated carbon emissions, traffic congestion, and road wear. Local commercial quarries (including Maher's Quarry, Gleeson Quarries, and Roadstone Killough) have been identified and assessed as potential sources for specialised surface course aggregates, ready-mix concrete, and supplementary materials where required. The combination of on-site extraction and local commercial sourcing represents an optimised construction approach balancing material needs and transport impacts.



Third Party Submission	Response
<u>Structural Property Damage & Pre-Blasting Surveys:</u> Concerns regarding structural damage (foundation movement, subsidence, wall cracking) from blasting vibrations. Observers demand mandatory pre-blasting structural surveys, strict PPV vibration limits, real-time decibel monitoring, and legally binding remediation bonds.	<u>Structural Property Damage & Pre-Blasting Surveys:</u> As outlined in Chapter 8 of the submitted EIAR, no rock blasting will occur on site which means that none of the concerns raised in the observations will arise. Furthermore, ground-borne vibration and potential acoustic/vibrational effects from extraction activities will be strictly controlled in accordance with standard BS 5228 guidelines and CEMP requirements to ensure levels remain well within safe environmental limits. All construction and extraction activities will be carried out under the supervision of a Project Supervisor Construction Stage (PSCS) and supported by rigorous environmental and geotechnical monitoring to ensure structural protection of surrounding properties.
<u>Omission of Existing Local Commercial Businesses from Maps:</u> An observation highlights a local commercial business (namely Haydens Haylage and Haydens Plant & Agri Limited registered to Longford Pass) are potentially omitted from Figures 11.3 and Figure 11.4 of the EIAR and the associated assessments.	<u>Omission of Existing Local Commercial Businesses from Maps:</u> Baseline mapping and socio-economic evaluations across the EIAR incorporate extensive desktop reviews, field ground-proofing surveys, and spatial datasets (including Tailte Éireann, Eircode, and local planning registers up to 2025/2026). The Applicant double-checked this, and the aforementioned receptors have been incorporated into these figures, and have been included in the extensive EIAR assessments.
<u>Restoration, Agricultural Return, and Financial Bonding:</u> Requests that if permitted, strict conditions must mandate full restoration of the borrow pit to original agricultural condition upon completion of extraction, backed by a substantial, legally enforceable financial bond regardless of future ownership changes.	<u>Restoration, Agricultural Return, and Financial Bonding:</u> As outlined in the submitted EIAR, following the completion of extraction the borrow pit will undergo controlled environmental reinstatement and re-vegetation. Reinstatement methodologies detailed in the CEMP and BEMP will be followed and include specifying that excavated topsoil and subsoil will be re-spread and allowed to naturally re-vegetate or be returned to compatible agricultural/forestry/amenity uses to blend seamlessly with the surrounding landscape. All post-construction reinstatement works will be executed in full compliance with standard planning conditions, statutory environmental controls, and developer commitments.



Third Party Submission	Response
Item 10: Property Devaluation and Economic Impact <u>Property Devaluation & Marketability:</u> Residents express severe concern regarding the significant devaluation, reduced saleability, and unmarketability of their homes, residential holdings, and farms due to direct proximity to 200m turbines, cumulative visual dominance, shadow flicker, and adjacent quarry/borrow pit operations.	<u>Property Devaluation & Marketability:</u> As outlined in Chapter 5 of the submitted EIAR, there is an emerging body of literature which shows no clear or consistent correlation between Wind Farms and negative impacts on property value or the saleability/marketability of same. The Proposed Development has been carefully designed on foot of extensive assessment and surveying efforts, employing a mitigation by design strategy from the outside whereby negative impacts are avoided firstly design and secondly through a comprehensive set of mitigation measures. In this regard, the design of the Wind Farm has ensured a minimum of an 800m distance between turbines and sensitive receptors which is in line with best practice and the current legislative landscape. The closest receptor is located c. 851m from Turbine T11. With regards to shadow flicker, this was extensively assessed as part of the Proposed Development as detailed in Chapter 12 of the submitted EIAR. This included modelling to predict, based on worst case conditions, the impacts on properties within the 2km study area (10 times rotor diameter). Furthermore, the turbines will be fitted with Shadow Flicker Control modules, consisting of light sensors and specialised software. The purpose of these modules is to reduce shadow flicker occurrence at any receptor through shutting down individual turbines during operation if the theoretically optimal on-site conditions for shadow flicker are met (i.e the light intensity is sufficient and shadow flicker might occur). In conclusion, as outlined in the EIAR, no significant impacts on any of the abovementioned items will arise on foot of the Proposed Development.



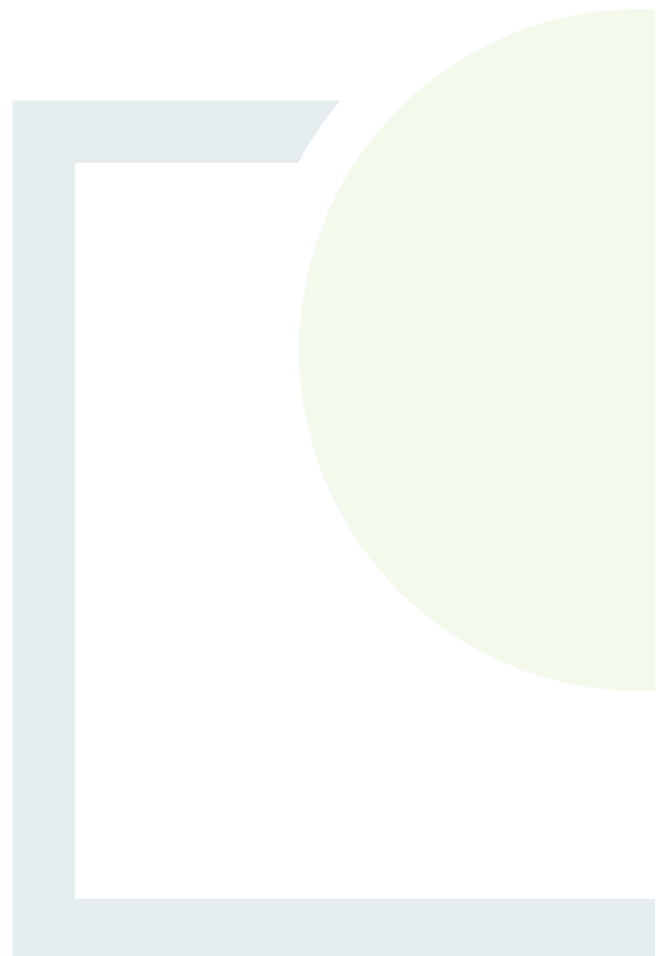
Third Party Submission	Response
<u>Contradictory EIAR Findings:</u> Observers highlight that while Chapter 5 of the EIAR cites Irish academic research (e.g., University of Galway 2023 study) confirming house price discounts within 2–3 km of wind turbines due to visual intrusion and noise, the applicant nevertheless reaches an unsupported project-level conclusion of long-term "imperceptible" property value effects for highly exposed nearby homes.	<u>Contradictory EIAR Findings:</u> Section 5.7.5.3 (Chapter 5) addresses the 2023 University of Galway study (Gillespie et al.), noting it relied on listing prices from Daft.ie rather than actual final sale prices. The EIAR compares this to large-scale, long-term studies—such as those from the U.S. Lawrence Berkeley National Laboratory (>50,000 sales) and Scottish Climate Change (>500,000 sales)—which confirm that local property price impacts are minimal and temporary. Combined with fixed site protections—including full shadow flicker controls, noise compliance, and an 851 m setback—the EIAR's conclusion that the project will not impact local property values over the long term remains well-supported.
Item 11: Land Rights	<u>Land Rights</u> The Applicant, Littleton Wind Farm DAC has provided landowner consent letters for all land within the red line planning application.



DESIGNING AND DELIVERING
A SUSTAINABLE FUTURE

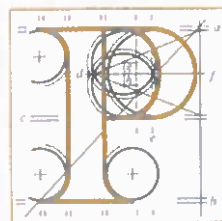
APPENDIX 1

Correspondence from ACP



Our Case Number: ACP-324370-26

Your Reference: Littleton Wind Farm Designated Activity Co



An
Coimisiún
Pleanála

Fehily Timoney and Company
Core House
Pouladuff Road
Cork
Co. Cork
T12 D773

FEHILY TIMONEY & Co.

Distribution **ELIOM**

28 AUG 2026

Job No: **P20-211**

Correspondence No:

Comment: **4**

Date: 27 August 2026

Re: The proposed Littleton Wind Farm comprising of 11 no. turbines and all associated works located in the townlands of Longfordpass North, Longfordpass South, Leigh, Bawnreagh, Clonoura, Noard, Derryhogan, Derryvella, Ballybeg, Lanespark, Newhill and Killeen in County Tipperary.
(www.littletonwindfarmplanning.ie)

Dear Sir / Madam,

I have been asked by An Coimisiún Pleanála to refer further to the above mentioned case.

Twenty-six (26) submission(s) have been received by the Commission in relation to the above mentioned case.

These submissions are available for inspection on the Commission's website at the following link:
<https://www.pleanala.ie/en-ie/case/324370>

The Commission hereby considers it appropriate to invite you to make a submission on the observations received in relation to the application.

Please be advised that any response to the Commission's invitation should not contain any additional reports or supplementary reports and should be confined to the issues raised in the observations received by the Commission. Any submission in relation to the above must be received by the Commission within 4 weeks from the date of this letter (i.e. not later than 25th September 2026).

If you have any queries in relation to the matter please contact the undersigned officer of the Commission.

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Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,



Niamh Hickey
Executive Officer
Direct Line: 01-8737145

PA08

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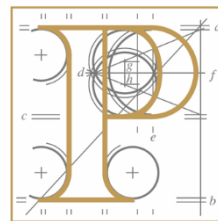
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Our Case Number: ACP-324370-26

Your Reference: Littleton Wind Farm Designated Activity Co



An
Coimisiún
Pleanála

Fehily Timoney and Company
Core House
Pouladuff Road
Cork
Co. Cork
T12 D773

Date: 22 September 2026

Re: The proposed Littleton Wind Farm comprising of 11 no. turbines and all associated works located in the townlands of Longfordpass North, Longfordpass South, Leigh, Bawnreagh, Clonoura, Noard, Derryhogan, Derryvella, Ballybeg, Lanespark, Newhill and Killeen in County Tipperary. (www.littletonwindfarmplanning.ie)

Dear Sir / Madam,

I have been asked by An Coimisiún Pleanála to refer further to the above mentioned case.

A report from Tipperary County Council has been received by the Commission in relation to the above mentioned case. This report is available for inspection on the Commission's website at the following link: <https://www.pleanala.ie/en-ie/case/324370>

The Commission hereby considers it appropriate to invite you to make a submission on the observations received in relation to the application. Please be advised that any response to the Commission's invitation should not contain any additional reports or supplementary reports and should be confined to the issues raised in the observations received by the Commission. Any submission in relation to the above must be received not later than **9th October 2026**.

If you have any queries in relation to the matter please contact the undersigned officer of the Commission.

Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Niamh Hickey
Executive Officer
Direct Line: 01-8737145
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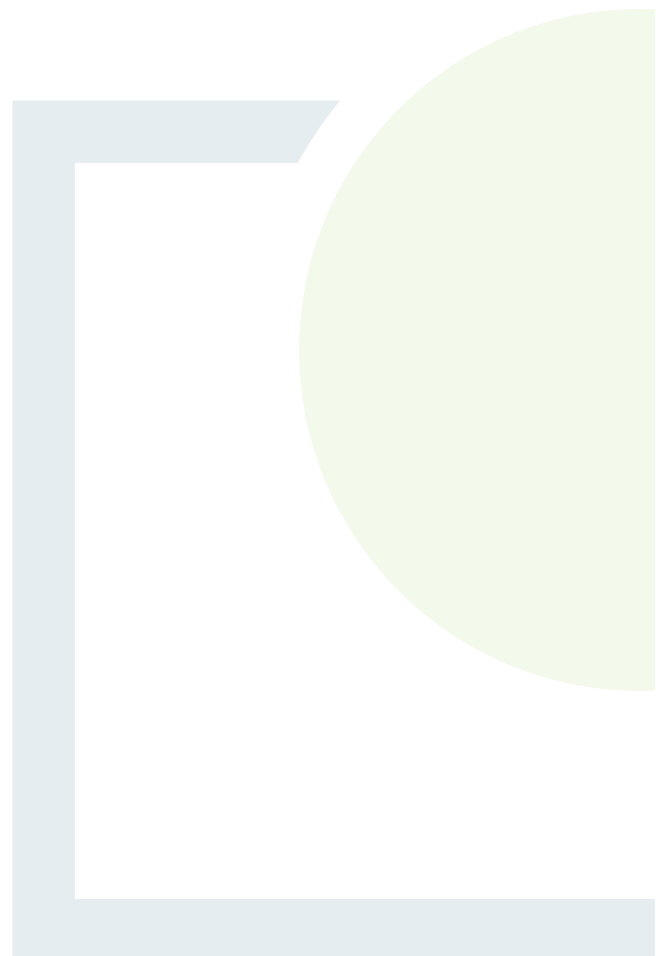
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APPENDIX 2

Addendum to Appendix 8.1 :
Geotechnical and Peat
Stability Assessment Report.



LITTLETON WINDFARM

Addendum to Appendix 8.1 (Geotechnical and Peat Stability Assessment Report)

Prepared for:

Littleton Wind Farm DAC



Date: October 2026

Document No:

P20211-FT-EGT-XX-RP-GE-0004

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TABLE OF CONTENTS

1.	ADDENDUM.....	1
1.1	Introduction.....	1
1.2	Revised Assessment Tables	1
1.3	Peat Repository Areas B1 and B2	1
1.4	Conclusion	1



1. ADDENDUM

1.1 Introduction

This addendum has been prepared to address an error identified in Tables 7-3 and 7-4 of the Geotechnical and Peat Stability Assessment. The addendum provides corrected coordinates for the assessment locations and clarifies the peat stability assessment results for Peat Repository Areas B1 and B2.

1.2 Revised Assessment Tables

A review of Table 7-4 identified an inconsistency between the coordinates presented in this table and those presented in Chapter 4 (Table 4-2). The coordinates presented in 7-4 have been updated and now correspond with the design coordinates presented elsewhere in the EIAR.

Revised Table 7-4 is provided at the back of this report.

1.3 Peat Repository Areas B1 and B2

An error was also identified in relation to the peat stability assessment results reported for Peat Repository Areas B1 and B2. While the peat stability assessments for these areas had been completed as part of the original analysis, the corresponding Bord na Móna probe locations and associated Factor of Safety (FoS) results were not included within the Appendix 8.1.

Multiple peat probes completed by FT and Bord na Móna within and adjacent to PRA B1 and PRA B2 were assessed as part of the peat stability analysis. The results indicate that all calculated Factors of Safety (FoS) significantly exceed the minimum acceptable value of 1.3.

The most critical assessment scenario was the Undrained Condition 2 analysis, which returned a lower-bound FoS of 4.65. These results demonstrate that the peat in the vicinity of PRA B1 and PRA B2 is stable.

A figure showing the Bord na Móna probe locations (addendum to Drawing No. P20-211-0600-0010, Appendix H of Appendix 8.1) together with the corresponding Factor of Safety assessment results (addendum to Appendix C of Appendix 8.1) is provided at the back of this report.

1.4 Conclusion

The corrections contained within this addendum do not alter the findings or conclusions of the Geotechnical and Peat Stability Assessment.

The revised coordinates in Table 7-4 have been corrected to align with the project layout presented elsewhere in the EIAR. The revised peat stability assessment results for PRA B1 and PRA B2 confirm that the peat at these locations is stable under both undrained and drained assessment conditions, with all Factors of Safety substantially exceeding the accepted minimum criterion of 1.3.

Furthermore, irrespective of the calculated Factors of Safety, the peat environment in the vicinity of PRA B1 and PRA B2 is characterised by relatively shallow peat depths, gentle topography and an absence of geomorphological indicators of peat instability. These site-specific characteristics are consistent with a stable peatland setting and further support the conclusion that the risk of peat instability in these areas is low.



Addendum to Table 7-3

Turbine No./Waypoint	Easting	Northing	Factor of Safety for Load Condition	
			Condition (1)	Condition (2)
T01	624044	657148	34.38	17.19
T02	623721	656639	28.65	15.63
T03	623595	656033	28.65	15.63
T04	623023	656034	57.31	21.49
T05	622809	655374	36.19	17.63
T06	623461	655081	31.26	16.37
T07	622465	654873	45.85	19.65
T08	623020	654421	49.12	20.23
T09	620928	651759	52.90	20.84
T10	621249	651425	28.65	15.63
T11	621455	651016	17.63	11.66
Construction Compound 1	620182	651965	17.19	11.46
Construction Compound 2	621707	653881	38.20	18.10
Construction Compound 3	623010	655591	11.48	5.74
Construction Compound 4	623297	658785	34.38	17.19
Main CBoP and TSA Compound	623216	659106	20.84	12.98
Amenity Car Park	622898	659710	No Peat	
Substation	622793	658615	24.56	14.33
Meteorological Mast	622153	654752	42.98	19.10
Security Cabin (Longford Pass Entrance)	623089	659308	10.42	8.00
Security Cabin (L2111 Derryvella Entrance)	621234	653009	No Peat	
Borrow Pit	623827	658938	No Peat	
Peat Repository Area A	623502	658857	12.06	8.93
Peat Repository Area B1	623703	657699	6.37	4.65
Peat Repository Area B2	623851	657702	6.37	4.65
Peat Repository Area C	621191	651841	34.38	17.19
Peat Repository Area D	621083	651739	16.37	11.09
Peat Repository Area E	621216	651555	24.56	14.33

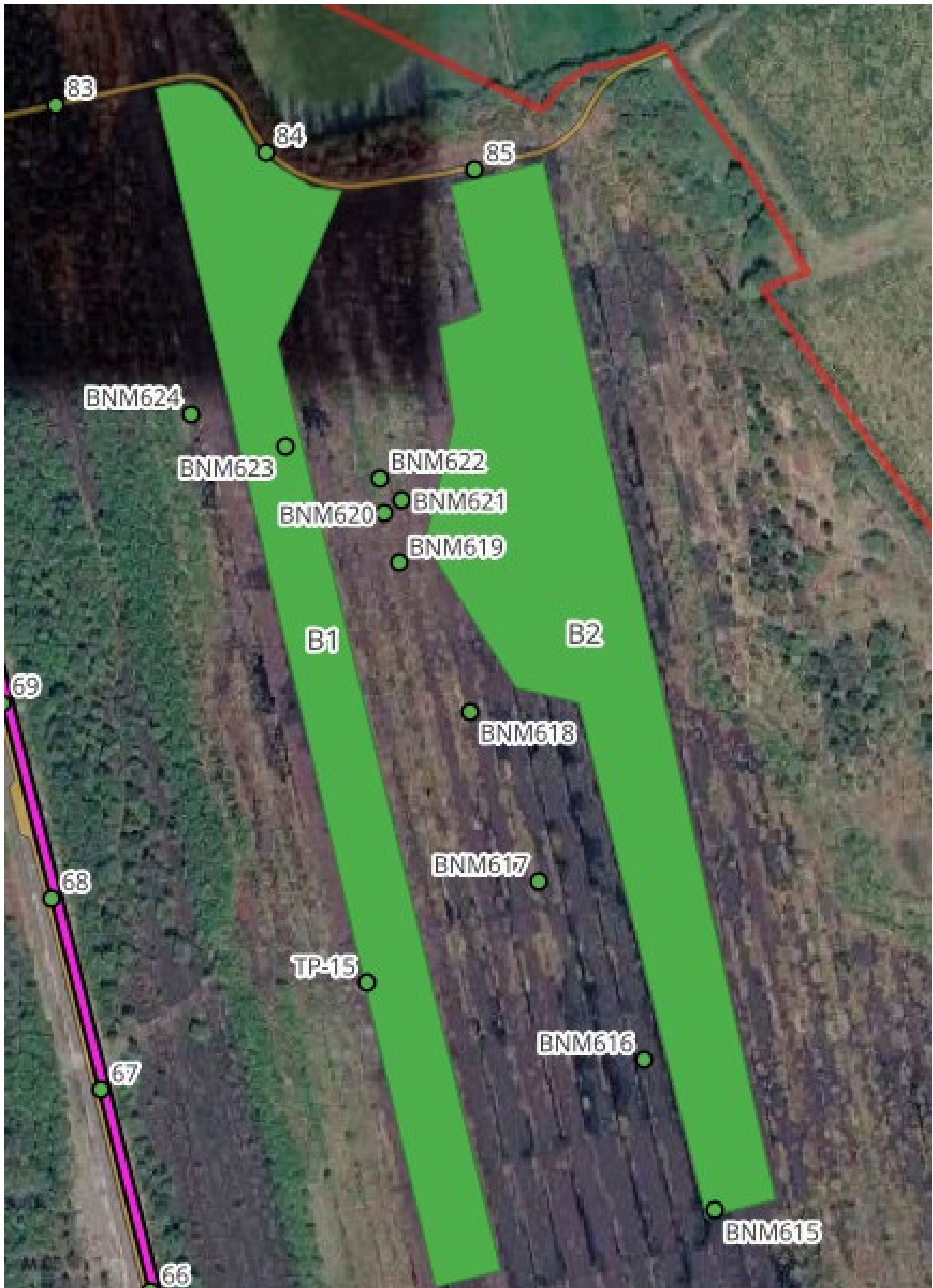


Addendum to Table 7-4

Turbine No./Waypoint	Easting	Northing	Factor of Safety for Load Condition	
			Condition (1)	Condition (2)
T01	624044	657148	49.64	38.18
T02	623721	656639	45.82	37.13
T03	623595	656033	45.82	37.13
T04	623023	656034	64.92	41.04
T05	622809	655374	50.84	38.47
T06	623461	655081	47.55	37.63
T07	622465	654873	57.28	39.81
T08	623020	654421	59.46	40.20
T09	620928	651759	61.98	40.61
T10	621249	651425	19.10	22.56
T11	621455	651016	38.47	34.49
Construction Compound 1	620182	651965	12.73	17.73
Construction Compound 2	621707	653881	25.47	26.13
Construction Compound 3	623010	655591	7.65	8.28
Construction Compound 4	623297	658785	49.64	38.18
Main CBoP and TSA Compound	623216	659106	40.61	35.36
Amenity Car Park	622898	659710	No Peat	
Substation	622793	658615	16.37	20.68
Meteorological Mast	622153	654752	55.37	39.45
Security Cabin (Longford Pass Entrance)	623089	659308	6.95	11.54
Security Cabin (L2111 Derryvella Entrance)	621234	653009	No Peat	
Borrow Pit 1	623827	658938	No Peat	
Peat Repository Area A	623502	658857	34.76	32.67
Peat Repository Area B1	623703	657699	9.55	14.60
Peat Repository Area B2	623851	657702	9.55	14.60
Peat Repository Area C	621191	651841	49.64	38.18
Peat Repository Area D	621083	651739	10.92	16.01
Peat Repository Area E	621216	651555	16.37	20.68



Addendum to Drawing No. P20-211-0600-0010, Appendix H of Appendix 8.1.





Addendum to Appendix C of Appendix 8.1 - Drained and Undrained FoS Results for PRA B1 and B2

Calculated FoS of Natural Peat Slopes for Littleton Wind Farm - Drained Analysis										
Turbine No./Waypoint	Slope	Design c'	Bulk unit weight of Peat	Unit weight of Water	Depth of In situ Peat	Friction Angle	Surcharge Equivalent Placed Fill	Equivalent Total Depth of Peat (m)	Factor of Safety for Load Condition	
	α (deg)	c' (kPa)	γ (kN/m ³)	γ_w (kN/m ³)	(m)	ϕ' (deg)	Condition (2)	Condition (2)	Condition (1)	Condition (2)
									100% Water	100% Water
83	1	4	10.0	10.0	0.60	25	1.0	1.6	38.20	31.02
84	1	4	10.0	10.0	2.10	25	1.0	3.1	10.92	16.01
85	1	4	10.0	10.0	2.40	25	1.0	3.4	9.55	14.60
BNM615	2	4	10.0	10.0	2.40	25	1.0	3.4	18.13	16.73
BNM616	2	4	10.0	10.0	2.70	25	1.0	3.7	17.60	16.45
BNM617	2	4	10.0	10.0	1.50	25	1.0	2.5	21.00	17.94
BNM618	2	4	10.0	10.0	1.70	25	1.0	2.7	20.10	17.60
BNM619	2	4	10.0	10.0	1.60	25	1.0	2.6	20.52	17.76
BNM620	2	4	10.0	10.0	0.50	25	1.0	1.5	36.29	21.00
BNM621	2	4	10.0	10.0	0.85	25	1.0	1.9	26.85	19.55
BNM622	2	4	10.0	10.0	0.30	25	1.0	1.3	51.58	22.18
BNM623	2	4	10.0	10.0	2.40	25	1.0	3.4	18.13	16.73
BNM624	2	4	10.0	10.0	1.00	25	1.0	2.0	24.82	19.09

Minimum = 9.55 14.60
Maximum = 51.58 31.02
Average = 24.13 18.97

Notes:

- (1) Assuming a bulk unit weight of peat of 10 (kN/m³)
- (2) Assuming a surcharge equivalent to fill depth of 1.0m.
- (3) Slope inclination (β) based on site readings and contour survey plans of site.
- (4) FoS is based on slope inclination and shear test results obtained from published data.
- (5) Peat depths based on probes carried out by FT.
- (6) For load conditions see Report text.
- (7) Minimum acceptable factor of safety required of 1.3 for first-time failures based on BS: 6031:1981 Code of practice for Earthworks.

Calculated FoS of Natural Peat Slopes for Littleton Wind Farm - Undrained Analysis									
Turbine No./Waypoint	Easting	Northing	Slope	Undrained shear strength	Bulk unit weight of Peat	Peat Depth	Surcharge Equivalent Placed Fill Depth (m)	Factor of Safety for Load Condition	
			β (deg)	c _u (kPa)	γ (kN/m ³)	(m)	Condition (2)	Condition (1)	Condition (2)
83	623550	658052	1	6	10	0.60	1.6	57.31	21.49
84	623658	658027	1	6	10	2.10	3.1	16.37	11.09
85	623767	658018	1	6	10	2.40	3.4	14.33	10.11
BNM615	623891	657478	2	6	10	2.40	3.4	7.17	5.06
BNM616	623855	657556	2	6	10	2.70	3.7	6.37	4.65
BNM617	623800	657649	2	6	10	1.50	2.5	11.47	6.88
BNM618	623764	657737	2	6	10	1.70	2.7	10.12	6.37
BNM619	623727	657814	2	6	10	1.60	2.6	10.75	6.62
BNM620	623720	657840	2	6	10	0.50	1.5	34.41	11.47
BNM621	623729	657847	2	6	10	0.85	1.9	20.24	9.30
BNM622	623718	657858	2	6	10	0.30	1.3	57.34	13.23
BNM623	623669	657875	2	6	10	2.40	3.4	7.17	5.06
BNM624	623620	657891	2	6	10	1.00	2.0	17.20	8.60

Minimum = 6.37 4.65
Maximum = 57.34 21.49
Average = 20.79 9.23

Notes:

- (1) Assuming a bulk unit weight for peat of 10kN/m³
- (2) Assuming a surcharge equivalent to fill depth of 1m of peat i.e. 10kPa.
- (3) Slope inclination (β) based on site readings and site contour plans.
- (4) A lower bound undrained shear strength, c_u for the peat of 6 and 8kPa was selected for the assessment. It should be noted that a c_u of 6/8kPa for the peat is considered a conservative value for the analysis and is not representative of all peat present across the site. In reality the peat has a significantly higher undrained strength.
- (5) Peat depths based on probes carried out by FT.
- (6) For load conditions see report text.



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