

OBJECTION / OBSERVATION PROPOSED LITTLETON WIND FARM

An Coimisiún Pleanála Case Reference: 324370

Littleton Wind Farm DAC – 11 turbines and associated works

Property: E41 AC64, County Tipperary

Approximate distance to nearest proposed turbine: 800 metres

This submission is made by our family as residents living approximately 800 metres from the nearest proposed turbine. We respectfully ask An Coimisiún Pleanála to refuse permission for the proposed development, or, at minimum, to require the outstanding environmental matters identified below to be fully addressed before any decision is made.

1. Our home and residential amenity

Our family home at E41 AC64 is approximately 800 metres from the nearest proposed turbine. We understand that approximately 800 metres is also the minimum residential setback referred to by the developer. Our home is therefore among the closest residential properties to the proposed development.

The proposed turbines would be very large structures, with a maximum tip height of approximately 200 metres. We are concerned about the effect of living at this distance from infrastructure of this scale, including operational and night-time noise, low-frequency noise, amplitude modulation, shadow flicker, visual impact, lighting, construction disturbance, traffic and the cumulative effect on the enjoyment of our home.

We ask the Board to consider the actual experience of residents living approximately 800 metres from a turbine of this scale, rather than treating the setback simply as a numerical threshold.

2. Consultation history and the promised noise monitoring

Our family has engaged with this proposal for several years. The first open community meeting we attended was held at Glengoose Community Hall during the COVID-19 period. The developer's published consultation information records a community engagement session there on 1 December 2021. We subsequently attended another community meeting at Littleton Community Hall less than a year ago.

Noise has been a concern from the early stages. During our engagement with the project, a representative told us that a noise monitor would be installed at our property to establish the existing background noise levels. The project's Community Liaison Officer is known to us as Colm; we understand that the developer does not publicly provide his surname.

Despite the passage of approximately three years, the promised monitoring was never undertaken. This concerns us because baseline monitoring at our home would have established an objective record of the acoustic environment before construction.

We ask the Board to establish why the monitoring was not carried out, whether the commitment was recorded, who made it, where baseline monitoring was undertaken instead, why those locations were selected, and whether they genuinely represent the acoustic environment at our home.

We respectfully request independent baseline noise monitoring at our property before construction, if permission is contemplated, together with appropriate post-construction monitoring. Monitoring should consider night-time noise, low-frequency noise, tonal noise, amplitude modulation, prevailing wind direction, downwind conditions and the difference between predicted and actual noise.

3. Littleton Bog – a recovering ecosystem and ongoing drainage

Since peat extraction ceased, our family has witnessed Littleton

Bog becoming wetter and increasingly valuable for wildlife.

Approximately five years ago, when the pumps were not operating, the bog flooded. In the following spring, the newly created areas of open water attracted additional bird species, and we observed birds using the flooded areas and raising chicks.

Water is still flowing from the bog through the main drainage canal towards the River Suir. We are concerned that this continuing drainage may be inconsistent with the long-term objective of restoring a stable and naturally functioning peatland ecosystem.

On 7 August 2025 we wrote to Christopher O'Sullivan, T.D., then Minister of State for Nature, Heritage and Biodiversity, asking for assistance in understanding why water continued to drain from Littleton Bog through the historic main drainage system. The Minister's office acknowledged the correspondence on 12 August 2025 and stated that a further reply would issue. We followed up on 20 January 2026 and again on 21 January 2026. At the time of this submission, we have not received a substantive response.

Bord na Móna's 2018 Littleton Rehabilitation Plan states that it was prepared under Condition 10.2 of IPC Licence P0-409-01 and identifies environmental stabilisation, drainage and watercourse issues as part of rehabilitation. We therefore ask the Board to establish whether the current drainage arrangements are consistent with the applicable rehabilitation obligations and the long-term rehabilitation plan.

We also ask whether pumping or additional drainage will be required during construction, whether existing drains will be altered or maintained to protect the wind-farm infrastructure, and whether the proposed development could restrict future rewetting of the bog.

4. Our evidence of exceptional bird diversity

Our family has recorded almost 100 bird species in and around Littleton Bog. We ask that these observations be considered

alongside the applicant's formal surveys, particularly because the bog is a dynamic recovering ecosystem.

High-conservation-concern / red-listed species we have recorded or observed include Curlew, Snipe, Woodcock, Lapwing, Barn Owl, Kestrel, Golden Plover, Shoveler, Redwing, Meadow Pipit, Grey Wagtail and White-tailed Sea Eagle.

Other species of conservation concern observed include Whooper Swan, Tufted Duck, Wigeon, Great Crested Grebe, Hen Harrier, Short-eared Owl, Kingfisher, Merlin, Skylark, Sand Martin, Willow Warbler, Linnet, Goldcrest and Coot.

We have also recorded Goldeneye on Littleton Bog.

5. Curlew, including observations close to our home

We have observed Curlew on the remnant bog at the site boundary, close to our home and close to the location of a proposed turbine. Curlew have also been recorded in the applicant's assessment.

These observations are important because they demonstrate use of habitat immediately adjacent to the proposed development, rather than merely occasional passage through the wider landscape.

We watch Curlew displaying over the bog. Their flight behaviour may bring them into the rotor-swept area, while their ground-nesting behaviour creates potential vulnerability to construction disturbance.

We ask that the Board consider collision risk, breeding habitat, disturbance, displacement and the effectiveness of proposed mitigation.

6. Snipe, Woodcock and Lapwing

We regularly observe Snipe on the bog and have observed Woodcock display flights at dusk. Lapwing have become a more recent coloniser as the bog has become wetter.

These observations suggest that the changing hydrology is creating valuable wetland and wader habitat. Snipe, Woodcock and Lapwing are also ground-nesting species and may be vulnerable to construction disturbance and habitat alteration.

We ask the Board to consider not only collision risk but also habitat loss, displacement and disturbance during breeding.

7. Whooper Swans and other waterbirds

Littleton is an important location for wintering Whooper Swans. We have observed over 100 Whooper Swans roosting on the bog pools at night. They arrive in the evening from surrounding feeding areas.

We are concerned that movements between feeding areas and night-time roosts could create collision risk, particularly during darkness, fog, mist and poor visibility. We ask that actual flight paths and flight heights be considered rather than assuming that birds remain within the bog boundary.

8. Hen Harrier, owls and other birds of prey

Hen Harriers are seen in the area; our records include a Hen Harrier observed at the Old Cons Road area on 8 March 2024. We also regularly observe Short-eared Owl, Merlin and Kestrel. A Barn Owl nests on the site boundary and hunts over the bog at night. Kestrels are commonly seen hunting over the bog.

We ask that the assessment consider the wider hunting and commuting landscape and not simply whether nests occur within the turbine footprint.

9. Pair of Common Cranes (*Grus grus*)

A pair of Common Cranes (*Grus grus*) was observed on Littleton Bog in 2025. We consider the observation of a pair particularly noteworthy and ask that the potential use of the bog by this species for breeding or other important ecological purposes be properly

assessed.

We ask the Board to consider the significance of this observation in the context of the recovering wetland habitat and to ensure that the ornithological assessment adequately addresses the species and any potential collision, disturbance and habitat impacts.

10. Other protected species and Marsh Fritillary

Littleton Bog and the surrounding area are important for Otter, Pine Marten, Badger, Red Squirrel and Irish Hare. We ask that construction roads, foundations, cabling, drainage, vehicle movements and disturbance be assessed for their effects on these species.

Marsh Fritillary is also present on the bog and is a species of European conservation importance. We understand that mitigation includes measures relating to Marsh Fritillary habitat. We question whether moving habitat can adequately substitute for protecting established functioning habitat in situ.

We ask what habitat would be lost or disturbed, how many larval webs or other indicators were identified, what evidence supports translocation success, and what long-term monitoring and contingency measures would apply if mitigation failed.

11. Invertebrate survey – potential information gap

We have been unable to identify what we consider to be a sufficiently comprehensive dedicated survey of the wider invertebrate community. We ask the Board to clarify whether such a survey was undertaken and, if so, its dates, seasons, methods, locations and taxonomic coverage.

This matters because invertebrates are fundamental to the bog food web, pollination, decomposition and nutrient cycling, and because the presence of Marsh Fritillary makes the ecological baseline particularly important.

We ask whether aquatic and nocturnal invertebrates and relevant groups such as moths, beetles, bees, flies, hoverflies and spiders were assessed, and whether the effects of changing water levels and habitat fragmentation were considered. If a comprehensive survey has not been undertaken, we ask that this potential material information gap be addressed before a decision is made.

12. Water management and construction

The hydrology of Littleton Bog is not a theoretical issue. We have personally observed how rapidly water levels can change when the pumps are not operating, and how quickly wetland habitat and bird use can develop.

We ask: Will pumping be required during construction? Where would pumped water be discharged? How will sediment and peat be controlled? What happens if drains block or fail? Who will maintain the drainage system? Will infrastructure designed to protect turbines prevent future rewetting? What is the intended long-term water level and discharge regime?

We also ask the Board to consider the relationship between the proposed wind farm and Bord na Móna's rehabilitation obligations, rather than assessing the two matters in isolation.

13. Grid capacity and the effective use of additional wind generation

We recognise the importance of renewable electricity. However, the public benefit of additional generation should also be considered alongside the capacity of the electricity network to transport and use that electricity.

RTÉ reported on 28 July 2026 that Justin Moran, Director of External Affairs at Wind Energy Ireland, said 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 to carry all the power produced by wind farms. EirGrid said renewable

generation may need to be turned down at times because of surplus generation, system-wide security requirements or local network constraints.

We recognise that grid reinforcement is underway and that this does not necessarily mean that Littleton could not ultimately connect. Nevertheless, we ask the Board to establish what additional grid infrastructure is required for this project, whether it is currently available, when it will be available, and what proportion of the proposed generation could be subject to constraint or dispatch-down.

We believe it is reasonable to assess not only whether turbines can technically connect but also how much of their expected electricity output can actually be transported and used, particularly where the development would have immediate and permanent environmental and residential impacts.

14. Alternative long-term value for Littleton Bog

We ask whether the long-term biodiversity, educational and recreational value of Littleton Bog has been fully considered.

Littleton is centrally located in Ireland, close to the motorway and within relatively easy reach of Dublin. We believe the recovering bog could potentially support a significant nature reserve, birdwatching, education and nature-tourism resource.

If the objective is to create long-term economic value from the former industrial peatland, we ask whether a nature-based alternative, or a model giving priority to restoration and public access, has been meaningfully examined.

15. Conclusion and request

Our objection is not an objection to renewable energy as such. We support the need for Ireland to transition towards cleaner energy. Our concern is whether this particular location is appropriate for

infrastructure of this scale.

We live approximately 800 metres from the nearest proposed turbine and would experience the development every day. We have watched Littleton Bog recover, seen water return, recorded almost 100 bird species, observed breeding and wintering birds, and witnessed how changes in drainage affect the ecology of the site.

We are particularly concerned that the development could conflict with the continued hydrological and ecological recovery of the bog, while significant questions remain concerning residential noise, invertebrate surveying, bird collision and disturbance, protected species, drainage and the relationship between the proposed infrastructure and peatland rehabilitation.

For these reasons, we respectfully ask An Coimisiún Pleanála to refuse permission for the proposed Littleton Wind Farm.

If the Board is not minded to refuse permission, we respectfully request that the matters identified above be fully addressed through additional independent assessment and appropriate conditions before construction is permitted.

Appendix A – Supporting sources

An Coimisiún Pleanála Case 324370 – proposed 11-turbine Littleton Wind Farm and application documents.

<https://www.pleanala.ie/en-ie/case/324370>

Bord na Móna, Littleton Rehabilitation Plan 2018 – including Condition 10.2 IPC licence context.

<https://leap.epa.ie/docs/76c46b4c-fd30-4322-8c53-52f477b400e6.pdf>

RTÉ, 28 July 2026 – grid constraints and wind electricity that could not be used.

<https://www.rte.ie/news/2026/0728/1585436-wind-energy-electricity-grid/>

Declaration

The observations described in this submission are based on our family's direct experience and observations unless otherwise identified as information from the applicant, Government correspondence or published sources. We are willing to provide supporting photographs, records and correspondence where available.

Signed: Enda & Sinead O Donoghue. Date 10/08/2026

Address: E41 AC64, County Tipperary