

To:

An Coimisiún Pleanála

Case Reference: PAX92.324370

Re: Proposed Littleton Wind Farm, County Tipperary – Submission/Objection

Dear Sir/Madam,

I wish to make a formal objection to the proposed Littleton Wind Farm development.

I am a resident of the Derryvella area of County Tipperary and my home is located within the wider area that would be affected by the proposed development.

I wish to make clear at the outset that my objection is **not an objection to renewable energy or to the principle of wind energy**. I recognise the importance of renewable electricity generation and Ireland's climate objectives.

My objection is to the **scale, location and cumulative environmental, residential, recreational and community impacts of this particular proposal**, and to my concern that the application has not adequately demonstrated that these impacts are acceptable or that the additional generation represents a proportionate and strategically justified use of this particular location.

The proposal involves **11 wind turbines with a maximum blade-tip height of approximately 200 metres**, together with substantial foundations, hardstand areas, internal roads, drainage, underground cabling, substation and other associated infrastructure.

I respectfully ask An Coimisiún Pleanála to consider the following matters.

1. Exceptional scale of the proposed development

The proposed turbines would be approximately **200 metres from ground level to blade tip**, with a rotor diameter of approximately 162 metres and a hub height of approximately 119 metres.

These are extremely large industrial structures.

The fact that a development may comply with applicable separation distances does not, in itself, establish that the resulting impact on residential amenity is acceptable.

A 200-metre turbine viewed from approximately 1–2 kilometres remains a very substantial structure and represents a fundamentally different scale of development from ordinary agricultural or rural development.

The assessment should therefore consider not merely whether minimum separation distances have been achieved, but whether the **scale and visual dominance of the turbines are compatible with the established rural character and residential amenity of the area.**

2. Impact on residential amenity

My home is in the Derryvella area, within the landscape in which the proposed development would be experienced.

The applicant identifies a substantial number of residential properties within the study area, including **396 residential properties within 2 kilometres of the turbine array.**

This is therefore not a development affecting only a small number of isolated dwellings.

The Board should consider the actual experience of residents living in this landscape, including:

- the height and scale of the turbines;
- the number of turbines visible simultaneously;
- movement of the rotor blades;
- aviation warning lighting;
- duration of the visual impact;
- shadow flicker;
- operational noise;
- cumulative effects from other wind-energy developments; and
- the permanent change from a predominantly rural landscape to one containing substantial industrial infrastructure.

3. Exceptional cumulative wind-energy development

This is one of my principal concerns.

The applicant identifies approximately **128 existing and consented turbines within 20 kilometres** of the proposed development.

The applicant's cumulative Zone of Theoretical Visibility indicates that approximately **56.6% of the study area has the potential for combined views** of the proposed Littleton development and existing or consented wind-energy developments.

The existence of other turbines should not automatically be regarded as reducing the significance of adding a further 11 turbines of approximately 200 metres in height.

Indeed, the presence of existing development makes the cumulative assessment more important.

The relevant question should be whether the landscape has reached a point where the **continued addition of large-scale wind-energy infrastructure results in an unacceptable cumulative change to landscape character and visual amenity.**

The Board should assess cumulative impact from the perspective of people living in and using the landscape, rather than considering each wind farm in isolation.

4. Landscape capacity

The applicant concludes that the landscape can accommodate the proposed development.

However, a landscape's ability to accommodate one wind farm cannot reasonably be assumed to mean that it can accommodate an unlimited number of additional developments.

The relevant question should not simply be:

"Can turbines be seen in this landscape already?"

It should be:

"Can this landscape sustainably accommodate another 11 turbines of approximately 200 metres in height without unacceptable further alteration to its character, visual amenity, recreational value and residential environment?"

The Board should consider whether the cumulative landscape has reached a point where another major development would represent an unacceptable intensification.

5. Cumulative assessment and theoretical visibility

The applicant's cumulative assessment relies significantly upon Zone of Theoretical Visibility modelling and consideration of screening from vegetation and other landscape features.

I ask the Board to scrutinise this methodology carefully.

Vegetation is not a permanent or reliable visual barrier. Trees and hedgerows change with the seasons, can be removed or managed, and provide limited screening for structures approximately 200 metres high.

The fact that lower portions of turbines may be screened does not necessarily prevent the upper portions from remaining prominent within the landscape.

6. Shadow flicker

The application identifies residential receptors with potential to experience shadow-flicker effects.

The applicant proposes turbine shutdown controls as mitigation.

I am concerned that reliance upon mitigation should not replace proper consideration of whether the underlying development is appropriately located.

The Board should establish whether:

- all potentially affected dwellings have been correctly identified;
- the assumptions used in the assessment are appropriate;
- cumulative effects from multiple turbines have been considered;
- the shutdown system will operate reliably; and
- the proposed mitigation can be independently monitored and enforced.

If permission were to be granted, any shadow-flicker condition should provide for robust monitoring and automatic shutdown where required.

7. Noise and cumulative noise

I have concerns regarding predicted operational noise levels and, in particular, the cumulative effect of the proposed development together with existing and consented wind farms.

The Board should consider whether the assessment adequately reflects:

- night-time conditions;
- atmospheric conditions conducive to sound propagation;
- low-frequency components;
- amplitude modulation;
- cumulative noise from multiple developments; and
- the potential difference between predicted and actual noise levels.

Compliance with a numerical noise limit should not automatically establish that residential amenity will be unaffected.

8. Peatland and the special circumstances of Derryvella

The proposed wind farm is located within an area of former industrial peatland comprising Longfordpass, Littleton, Lanespark and Derryvella bogs.

There is also a **separate Substitute Consent application, Case 324359**, concerning historic peat extraction and associated activities in these bog areas.

This is highly relevant to the assessment of the Littleton Wind Farm.

The Board should be satisfied that the wind-farm development will not adversely interfere with:

- ongoing peatland rehabilitation;
- rewetting;
- drainage management;
- surface-water flows;
- groundwater conditions;
- peat stability;

- water quality; or
- developing ecological habitats.

The Board should not treat the current environmental condition of the peatlands as a fixed baseline where the landscape is actively undergoing rehabilitation.

9. Hydrology and water quality

Former industrial peatlands are highly dependent upon drainage and water-level management.

The proposed development will introduce turbine foundations, large hardstand areas, approximately 15 kilometres of new internal roads, upgraded roads, drainage infrastructure, cable trenches, construction compounds and significant earthworks.

These interventions have the potential to alter local drainage patterns and water movement.

The Board should be satisfied that the proposed development will not adversely affect the hydrological regime of Derryvella and the surrounding bog areas.

Particular attention should be given to the interaction between existing drainage associated with former peat extraction and the new drainage arrangements proposed for the wind farm.

10. Peat stability and construction risk

The presence of deep peat and former industrial peatlands means that ground conditions deserve particular scrutiny.

The Board should be satisfied that the assessment of peat stability adequately considers the **combined effect of roads, foundations, hardstands, drainage works and construction activity**, rather than considering individual infrastructure elements in isolation.

Previous experience of wind-energy development on peatlands demonstrates why peat-related construction risks cannot simply be regarded as theoretical.

I am not suggesting that Littleton will necessarily experience similar problems.

Rather, the Board should apply an appropriately precautionary approach and ensure that the applicant's assessment is sufficiently robust.

11. Biodiversity and future ecological value

The former industrial peatlands are not environmentally static.

Following cessation of peat extraction and rehabilitation, habitats can develop and change substantially.

The Board should therefore consider not only the present ecological condition but also the likely future development of habitats arising from peatland rehabilitation over the operational lifetime of the wind farm.

Potential effects include:

- habitat loss;
- habitat fragmentation;
- disturbance;
- bird displacement;
- collision risk;
- effects on bats;
- impacts on wetland habitats;
- changes to watercourses; and
- cumulative effects arising from other wind-energy developments.

12. Ornithology and cumulative effects on birds

Wind turbines of approximately 200 metres height represent significant vertical structures within the landscape.

The Board should carefully examine the bird survey methodology, survey periods, flight activity and collision-risk assessment.

A bird population does not recognise individual planning boundaries.

The relevant ecological question is therefore not simply whether Littleton alone creates a significant effect, but whether the addition of Littleton to the existing and proposed network of wind farms could contribute to cumulative displacement or collision effects.

13. Interaction of environmental effects

Environmental effects should not be viewed entirely in isolation.

For residents, the experience of the development may consist of several effects occurring together:

visual impact + turbine movement + noise + shadow flicker + aviation lighting + construction traffic + landscape change + cumulative wind development.

Similarly, for the natural environment:

peat disturbance + drainage alteration + water-quality risk + habitat change + bird impacts + cumulative wind-energy development.

The Board should therefore pay particular attention to the interaction of effects and whether the application has adequately assessed those combined impacts.

14. Wider planning context – from industrial peat extraction to rehabilitation and recreation

I respectfully ask the Board to consider the proposed wind farm within the wider and evolving planning context of the Littleton, Derryvella, Lanespark and Longfordpass area.

Large areas of the surrounding peatlands were historically subject to industrial peat extraction.

The planning system is now addressing the legacy of that activity through Substitute Consent and peatland rehabilitation.

At the same time, the area is undergoing a transition involving:

- peatland rehabilitation and rewetting;
- habitat restoration;
- biodiversity enhancement;
- walking and cycling infrastructure;
- recreational amenity;
- tourism and outdoor recreation; and
- improved connections between surrounding communities.

This represents a significant change from the historic use of the landscape for industrial peat extraction.

The Board should therefore consider whether the proposed Littleton Wind Farm is compatible with this emerging future character.

15. Recent planning permission for walking and cycling infrastructure

Planning permission has recently been granted for a substantial shared walking and cycling route connecting into the existing Lough Derryvilla Loop and extending through Bord na Móna lands around Ballybeg, Derryvella and Lanespark.

An Coimisiún Pleanála granted permission for this development under **Case 323662 on 27 January 2026**.

The Littleton Wind Farm EIAR also recognises the recreational importance of the wider area, including the Littleton Labyrinth and Midlands Trail Network.

The planning system has therefore recognised the potential for these former industrial peatlands to provide a **recreational and amenity resource for local communities and visitors**.

The proposed wind farm would introduce eleven industrial-scale turbines, each approximately 200 metres in height, together with associated infrastructure, into that same landscape.

The Board should therefore assess whether these forms of development are genuinely compatible.

A person walking or cycling through the landscape will experience the development at a much slower pace and for considerably longer than a person travelling through the area by car.

The visual experience is therefore an important component of the recreational value of these routes.

Physical accessibility is not the same as recreational amenity.

A walking or cycling route can remain open while its landscape setting and recreational experience are materially diminished.

16. Need for a long-term strategic development plan for the former Bord na Móna lands

The planning circumstances arising in this area demonstrate, in my view, a strong case for a more comprehensive and long-term strategic approach to the future use of the former Bord na Móna peatlands.

These lands are undergoing a fundamental transition.

For many decades they were managed primarily for industrial peat extraction. That use has now substantially ceased, and the planning system is addressing the legacy of that activity through rehabilitation programmes and Substitute Consent proceedings.

At the same time, proposals are emerging for a range of future uses, including:

- renewable-energy generation;
- solar energy;
- battery energy storage;
- peatland rehabilitation;
- biodiversity and habitat restoration;
- walking and cycling infrastructure;
- recreational amenities;
- tourism;
- community uses; and
- other potential uses of the former industrial lands.

I respectfully suggest that this creates a strong case for the preparation of a **long-term strategic development and land-use plan for the former Bord na Móna peatlands in the wider Littleton/Derryvella/Lanespark/Longfordpass area.**

Such a strategy could establish the intended future role of different parts of the former peatlands and provide greater certainty for residents, landowners, local communities, developers and planning authorities.

It could identify:

- areas most suitable for continued peatland rehabilitation;
- areas of particular biodiversity or ecological importance;
- areas suitable for walking, cycling and recreation;
- areas with potential for tourism and community development;
- areas potentially suitable for renewable-energy development;
- areas potentially suitable for solar generation or energy storage;
- areas where cumulative development should be restricted;
- important landscape and visual corridors;
- hydrological and water-quality considerations;
- appropriate locations for infrastructure; and
- how these different uses should interact over the long term.

17. Particular importance of strategic planning in light of Substitute Consent

I consider the need for such a strategic approach to be particularly important given the Substitute Consent process affecting the area.

I am not suggesting that the existence of Substitute Consent proceedings automatically prevents consideration of other planning applications.

Rather, the process highlights the **exceptional planning history of these lands and the need to consider their future planning function carefully.**

The planning system is being asked to address the legacy of historic peat extraction and its environmental consequences.

At the same time, major new uses are being proposed for the same landscape.

It would be unfortunate if historic development were addressed through the Substitute Consent process while the future character of the landscape was subsequently determined through a succession of major individual planning applications without a clear overarching strategy.

Residents should be able to have confidence that individual planning applications are being assessed within a coherent long-term vision for the area.

18. Strategic planning and cumulative development

A long-term strategic plan would also provide an opportunity to address cumulative development before the landscape becomes progressively committed to individual projects.

This is particularly relevant to wind-energy development.

The applicant's own assessment identifies approximately **128 existing and consented turbines within 20 kilometres**.

If each individual development is considered principally on its own merits, there is a risk that the cumulative effect of successive projects becomes significant only after the landscape has already been substantially transformed.

A strategic plan could identify an appropriate level and distribution of development before that point is reached.

It could also establish clear areas where renewable-energy development is appropriate and areas where the protection of biodiversity, recreation, residential amenity or landscape character should take precedence.

19. Strategic planning should determine future land use rather than funding opportunities

There is also a wider strategic planning principle which I respectfully ask the Board to consider.

The future use of the former Bord na Móna peatlands should, in my view, be determined primarily by a **long-term assessment of what represents the most appropriate environmental, social, recreational and economic use of the land**, rather than by the availability of particular funding mechanisms or investment opportunities at a particular point in time.

Funding programmes and investment opportunities can understandably influence which projects are capable of progressing.

However, there is a risk that where individual funding opportunities become available before a comprehensive land-use strategy has been established, the availability of funding can begin to influence the future use of the landscape rather than the strategic planning process determining which uses are most appropriate.

I am **not suggesting that this is necessarily the case with the present application**, nor am I suggesting that securing investment for renewable-energy development is inappropriate.

Rather, I suggest that this principle is particularly important in relation to a large and strategically important former industrial landholding such as the Bord na Móna peatlands.

A strategic plan should first establish:

- what the long-term objectives for the landscape should be;
- which areas should be prioritised for peatland restoration;
- which areas are most appropriate for biodiversity enhancement;

- where recreation and tourism should be developed;
- where renewable-energy development may be appropriate;
- what forms of renewable energy are most suitable in different locations;
- where energy storage could be accommodated;
- which areas should remain relatively undeveloped; and
- what level of cumulative development the landscape and surrounding communities can reasonably accommodate.

Once those strategic decisions have been established through an appropriate planning and public consultation process, **funding and investment should then be directed towards delivering that agreed strategy**, rather than funding availability effectively determining the future land use.

This would provide greater confidence for local communities that the future of the former peatlands is being determined through a transparent and coherent planning process rather than evolving incrementally in response to individual commercial, funding or investment opportunities.

20. Consideration of alternative forms of renewable-energy development

I recognise that Ireland requires significant additional renewable-energy generation and that wind energy will form an important part of the country's future electricity mix.

However, I respectfully submit that this does not mean that the only relevant question is whether the proposed wind farm can generate renewable electricity.

The Board should also consider whether the **particular form and scale of renewable-energy development proposed is the most appropriate use of this particular landscape**, having regard to the environmental and community impacts identified elsewhere in this objection.

There are alternative or complementary forms of renewable-energy development, including **solar photovoltaic generation, battery energy storage and combinations of renewable generation and storage**.

These technologies have different land-use characteristics and may, depending on the particular location and design, have different impacts upon landscape character, residential visual amenity, peatland, recreation and biodiversity.

I am not suggesting that solar energy or any other technology is inherently without environmental impact, nor that it should automatically replace wind energy.

Rather, I respectfully submit that where a development of this scale would result in significant and potentially permanent impacts upon a landscape already subject to substantial wind-energy development, the Board should be satisfied that **reasonable consideration has been given to alternative ways of achieving the required renewable-energy objective with potentially lower environmental and community impacts**.

This is particularly relevant in the context of the former Bord na Móna lands.

A strategic plan could assess which renewable technologies are most appropriately located in different parts of the landholding, having regard to:

- grid availability;
- renewable-energy potential;
- landscape sensitivity;
- proximity to residential properties;
- biodiversity;
- peatland rehabilitation;
- hydrology;
- recreation and tourism;
- existing and proposed infrastructure;
- cumulative development; and
- the potential for combining renewable generation with battery storage.

Such an approach could allow renewable-energy development to be directed towards locations and technologies capable of providing significant energy benefits while minimising unnecessary environmental and community impacts.

21. Need to demonstrate that the proposed energy solution is appropriate

The issue is therefore not whether renewable energy is required.

The issue is whether **this particular renewable-energy solution, at this particular scale and in this particular location, represents an appropriate and proportionate response to that need.**

Given the substantial cumulative wind-energy development already present in the surrounding area, the approximately 128 existing and consented turbines identified by the applicant within 20 kilometres, the proposed height of approximately 200 metres, and the area's transition towards peatland rehabilitation and recreational use, I respectfully submit that the applicant should demonstrate why this particular form of energy development is preferable to reasonably available alternatives or combinations of technologies.

If materially lower-impact alternatives could provide a comparable contribution to renewable electricity generation while avoiding or reducing the substantial landscape, residential, recreational and ecological impacts identified in this objection, that should be an important consideration in determining whether the proposed development represents proper planning and sustainable development.

I therefore respectfully ask the Board to consider whether the application has demonstrated a sufficiently robust examination of **reasonable alternative energy-generation solutions and alternative configurations of renewable generation**, rather than assuming that a large-scale

wind farm is the appropriate solution simply because the site is capable of accommodating wind turbines.

22. Grid capacity, renewable-energy curtailment and cumulative development

I recognise that Ireland has significant national targets for renewable electricity generation and that additional renewable generation will be required to meet those targets.

However, the need for additional renewable generation at national level does not, by itself, establish that every individual wind-farm proposal is necessarily required or appropriately located.

Ireland's electricity system experiences periods in which available renewable generation is constrained or curtailed because the electricity system cannot always accommodate all available generation while maintaining a safe and secure system.

I recognise that EirGrid is actively upgrading the electricity system and increasing its ability to accommodate renewable generation.

I therefore do **not** suggest that Ireland has no need for additional renewable generation.

My concern is more specific.

Where a development would introduce eleven additional large turbines into an area already containing a substantial concentration of wind-energy infrastructure, the Board should consider whether the applicant has adequately demonstrated the **additional electricity-system benefit of this particular development**, having regard to existing and consented generation, grid constraints and the planned development of the transmission network.

The applicant's own cumulative assessment identifies approximately **128 existing and consented turbines within 20 kilometres**.

This raises a legitimate planning question as to whether continually adding generation in an already heavily developed wind-energy area represents the most efficient and proportionate use of land and grid infrastructure.

23. Installed capacity is not the same as useful electricity generation

The Board should distinguish between the **nominal installed capacity** of a wind farm and the amount of electricity that can actually be delivered to consumers at a given time.

Wind generation is inherently variable.

Periods of constraint and curtailment can also result in available renewable generation being reduced because of system or network limitations.

The environmental case for a new wind farm should therefore not be based solely upon its theoretical installed capacity or gross annual generation.

The Board should consider the extent to which the proposed development will provide **useful additional renewable electricity**, taking account of:

- existing wind generation;
- consented generation;
- transmission capacity;
- local constraints;
- system-wide curtailment;
- future grid reinforcement; and
- the timing of the availability of that generation.

24. Construction traffic and disturbance

The construction of 11 turbines of this scale will require substantial quantities of construction material, concrete, aggregate, steel and turbine components.

The Board should consider the actual effect of this construction activity on the local road network and local residents.

The impact is not limited to the number of HGV movements.

Large abnormal-load deliveries can result in:

- temporary road closures;
- traffic management;
- delays;
- noise;
- vibration;
- damage to local roads;
- disruption to agricultural activity; and
- disturbance to residents and recreational users.

The cumulative impact of these activities should be assessed together with other developments in the area.

25. Appropriate assessment and Natura interests

I ask the Board to independently scrutinise the Natura Impact Statement and the conclusions reached regarding potential effects on European sites.

Given the hydrological connections associated with the peatland and drainage systems, it is important that potential pathways to downstream water-dependent ecological interests are fully understood.

The assessment should consider both direct and indirect effects and the cumulative impact of the development in combination with other plans and projects.

26. Overall planning balance and conclusion

Having considered the application documentation and the circumstances of the Derryvella area, I respectfully request that An Coimisiún Pleanála refuse permission for the proposed Littleton Wind Farm.

My objection is based principally upon the **combined and cumulative effects** of the proposal rather than any single isolated issue.

In particular, I ask the Board to consider whether the applicant has demonstrated that the proposed development will not result in unacceptable:

- landscape and visual impacts;
- cumulative landscape impacts;
- residential amenity impacts;
- noise impacts;
- shadow-flicker impacts;
- peat stability risks;
- hydrological impacts;
- water-quality impacts;
- biodiversity impacts;
- ornithological impacts;
- construction traffic and disturbance;
- recreational and tourism impacts; and
- combined and interacting environmental effects.

I also ask the Board to consider the wider planning context.

The area has historically been subject to extensive industrial peat extraction. It is now undergoing a transition towards peatland rehabilitation, biodiversity restoration, walking, cycling and recreational use, while significant wind-energy development already exists or has been consented within the surrounding area.

Against that background, the proposal would introduce **11 additional industrial-scale turbines of approximately 200 metres in height**.

The Board should therefore consider whether the proposed development represents a coherent and sustainable continuation of the planning strategy for this area or whether it would constitute an excessive and incompatible intensification of industrial development.

I respectfully recommend that the Board recognise the need for a **long-term strategic development and land-use framework for the former Bord na Móna peatlands** in the wider Littleton/Derryvella/Lanespark/Longfordpass area.

Such a framework would allow renewable energy, solar generation, energy storage, peatland rehabilitation, biodiversity, recreation, tourism and other potential land uses to be considered within a coherent long-term strategy.

It would also allow decisions about future land use to be based upon the long-term needs and characteristics of the landscape rather than allowing individual projects, commercial opportunities or funding availability to progressively determine its future.

The Substitute Consent process affecting the area makes this strategic approach particularly worthy of consideration, as it provides an opportunity to address not only the legacy of historic peat extraction but also the future planning function of these lands.

I respectfully submit that the future character of this landscape should not be determined primarily through a succession of individual planning applications.

A strategic approach would allow the cumulative impacts of development to be considered **before further irreversible change takes place**, rather than retrospectively once the landscape has already been substantially transformed.

Finally, I ask the Board to consider whether the applicant has demonstrated that the additional electricity-system benefit of this particular development is proportionate to its substantial environmental, landscape, recreational and residential impacts, having regard to the significant existing and consented wind generation in the surrounding area and the electricity system's management of renewable constraint and curtailment.

I recognise the importance of renewable energy to Ireland's future.

However, **support for renewable energy does not require support for every renewable-energy development irrespective of location, scale or cumulative impact.**

I respectfully submit that the proposed Littleton Wind Farm has not demonstrated that it represents the appropriate balance between renewable-energy generation and the protection of the environmental, residential, recreational and landscape qualities of this particular area.

I therefore respectfully request that An Coimisiún Pleanála **refuse permission for the proposed Littleton Wind Farm.**

Yours faithfully,

Hugh Rodgers, Stephanie O'Callaghan

Derryvella, Glengoole, Thurles, Tipperary

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