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An Coimisiún Pleanála

64 Marlborough Street
 Dublin 1
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Re: Littleton Wind Farm - Proposed 11-turbine development, Co. Tipperary - Case PAX92.324370

Dear Sir/Madam,

Submission / Observation Objecting to Littleton Wind Farm**PAX92.324370**

I wish to make a formal submission objecting to the proposed Littleton Wind Farm. I am a resident of Derryvella, New Birmingham, Thurles, County Tipperary. My dwelling is at approximately 52.6233884, - 7.6671283, at approximately 126 m AOD. I consider that I will be directly affected by the development and by its associated infrastructure and amenity proposals.

I recognise the importance of renewable electricity generation and this submission is not an objection to wind energy in principle. My objection concerns whether this particular layout, on this particular rehabilitating former peat-extraction landscape, together with the extensive road, drainage, grid, amenity and other associated works, represents proper planning and sustainable development and whether the environmental information before the Commission is sufficiently reliable and complete to support permission.

The proposal comprises 11 wind turbines with a maximum blade-tip height of 200 m, a hub height of 119 m and a rotor diameter of 162 m, together with turbine foundations and hardstandings, approximately 15.45 km of new internal access roads, approximately 2.95 km of upgraded roads, drainage and culvert works, a borrow pit, construction compounds, a permanent 110 kV substation, underground cabling, six peat/spoil deposition areas and recreational amenity infrastructure. The EIAR also assesses an approximately 30.9 km underground grid connection and the turbine-delivery route. (EIAR Chapter 4.)

Principal grounds of objection

- unresolved reliability and traceability issues in the peat-stability assessment;
- compatibility of permanent infrastructure and peat deposition with ongoing peatland rewetting and rehabilitation;
- Water Framework Directive compliance that, on the applicant's own assessment, depends upon successful mitigation;
- internal inconsistencies and incompleteness in the reasonable-alternatives assessment;
- the dispersed two-part turbine layout and property-specific residential visual effects;
- whether the 2021 acoustic baseline remains representative in light of existing industrial noise, current noise complaints and unexplained data removal at monitoring location N4;
- Curlew collision and recreational-disturbance risks identified in the applicant's own ornithological assessment;
- existing and cumulative visitor traffic pressure associated with Lough Doire Bhile and the proposed wind-farm amenity;
- extensive public-road trenching and joint-bay works associated with the grid connection;
- property saleability/value and residential amenity at a dwelling with four turbines within approximately 2 km; and
- the absence of sufficiently specific information for near neighbours about the actual community benefits for which they would qualify.

1. Reliability and traceability of the peat-stability assessment

I have a significant concern regarding the reliability and traceability of the Geotechnical and Peat Stability Assessment in Appendix 8.1.

Table 7-3, which presents the undrained/short-term Factor of Safety results, gives turbine coordinates corresponding to the Littleton project. The immediately following Table 7-4, which presents the drained/long-term results, gives a completely different set of turbine coordinates. By way of example, T01 is listed in Table 7-4 as Easting 614198, Northing 727373, with the other turbines similarly located far outside the Littleton site. Those coordinates do not correspond with the turbine locations in Chapter 4 or with Table 7-3. (Appendix 8.1, Tables 7-3 and 7-4.)

I do not allege that the Factor of Safety calculations themselves were copied from another project or that peat instability has been proved. The point is that a principal summary table in the final geotechnical report contains locations that are plainly not the Littleton turbine locations. That is a material document-control and quality-assurance issue in an assessment relied upon to conclude that long-term peat-instability risk is acceptable.

Before relying on Appendix 8.1, I request that the Commission require a clear reconciliation of Table 7-4 with the Littleton turbine locations and sufficient evidence to demonstrate what coordinates, peat depths, slopes, groundwater conditions and other site-specific inputs were actually used in the drained calculations.

There is a separate concern regarding Peat Repository Areas B1 and B2. The Factor of Safety tables record “No Information” for both areas under drained and undrained conditions, yet the subsequent risk assessment assigns them a Negligible risk classification. This does not prove that either repository is unstable, but it is unclear what quantitative or site-specific basis supports a Negligible classification where the principal stability tables provide no result. (Appendix 8.1.)

This issue is not peripheral. The project entails the excavation, handling and storage of very substantial volumes of peat and other spoil. The Commission should therefore require the relevant stability evidence to be transparent, internally consistent and demonstrably site-specific before accepting the geotechnical conclusions.

2. Peatland rehabilitation, hydrology and long-term land use

The site should not be assessed merely as exhausted industrial land. It is former cutaway peatland undergoing an active hydrological and ecological transition. The EIAR and associated Bord na Móna rehabilitation material record drain blocking, rewetting, revegetation and water-level management, and the do-nothing scenario recognises that ecological succession and rehabilitation would continue.

The project introduces permanent and semi-permanent roads, hardstandings, turbine foundations, drains, culverts, a substation and peat/spoil repositories into that recovering hydrological system. The appropriate question is therefore not simply what percentage of the overall landholding is directly occupied by infrastructure. A road, drain or foundation can alter water movement beyond its direct footprint if it intercepts or redirects surface or subsurface flow or interferes with blocked drains and hydrological cells required for successful rewetting.

This concern was specifically raised by the National Parks and Wildlife Service during project consultation. NPWS stated that wind-farm development could significantly alter patterns of surface-water flow and could dry peat sufficiently to create subsurface water-loss pathways. It requested detailed consideration of peat excavation, storage, disposal/recovery and rehabilitation, and advised that spreading excavated peat on intact bog, wet/revegetated cutover bog or other ecologically valuable habitat would be unlikely to be acceptable. (Appendix 2.5 - NPWS Consultation.)

NPWS also expressly asked what land use best reduces carbon emissions in this location - including wind-farm development, rehabilitation/rewetting or a do-nothing scenario - and noted that rewetting is an established means of significantly reducing peatland carbon emissions. I submit that these questions require a substantive, spatially explicit answer rather than a general assertion that the footprint is small.

I request that the Commission establish, for each significant road, drainage element, foundation, hardstanding and peat repository, its relationship to existing and planned peatland rehabilitation, blocked drains, standing-water areas and water-level management. The Commission should also consider the long-term position after turbine decommissioning where access tracks, buried foundations and other infrastructure may remain in situ.

This is also relevant in the context of Regulation (EU) 2024/1991 on nature restoration, which recognises rewetting of drained peatland, including peat-extraction sites, as an important restoration measure. I do not suggest that the Regulation makes wind development on former peatland unlawful; rather, it reinforces the need to demonstrate why the selected development and layout are compatible with the site's ongoing restoration trajectory.

3. Water Framework Directive - compliance depends upon successful mitigation

The applicant's own Water Framework Directive Compliance Assessment shows why this issue requires particular scrutiny. In Table N, the applicant predicts deterioration in the unmitigated scenario for a number of surface-water bodies: Bregagh (Tipperary)_010, North Glengoole_010, Black (Twomileborris)_010, Clover_010, Drish_010 and Drish_020 are assessed as moving from Poor to Bad, while Drish_050 is assessed as moving from Good to Moderate. With the proposed mitigation, the assessment predicts restoration of the outcome to the existing status. (Appendix 9.2, Table N.)

I do not claim that the applicant's final assessment concludes that the project will breach the Water Framework Directive. It concludes the opposite after mitigation. The important point is that its conclusion of compliance is demonstrably dependent upon the mitigation working as intended.

Article 4 of Directive 2000/60/EC requires prevention of deterioration of surface-water status. In Case C-461/13, Bund für Umwelt und Naturschutz Deutschland eV v Bundesrepublik Deutschland (Weser), the Court of Justice held that the no-deterioration obligations apply to individual projects and that, unless a relevant derogation applies, authorisation must be refused where a project may cause deterioration or jeopardise the achievement of the Directive's environmental objectives. The Court also held that deterioration can arise where an individual quality element falls by one class even if the overall water-body classification does not change.

Accordingly, a conclusion that an effect is "not significant" for general EIA purposes is not, by itself, a demonstration that the separate Water Framework Directive no-deterioration test has been met. Where the applicant's own assessment predicts deterioration without mitigation, every material measure relied upon to avoid that deterioration should be sufficiently specific, achievable, effective and enforceable at consent stage.

I request an express finding by the Commission, at relevant water-body and quality-element level, that the wind-farm drainage, peat excavation and deposition, roads, culverts, borrow-pit drainage, grid trenching and watercourse crossings will not individually or cumulatively cause prohibited deterioration or jeopardise achievement of environmental objectives. Material measures necessary to that conclusion should not be deferred to later contractor methodology or post-consent agreement.

4. Reliability and adequacy of the reasonable-alternatives assessment

Chapter 3 identifies four principal design iterations, with Design Iteration 4 being the final fixed 11-turbine layout forming the basis of the planning application. The chapter states that a comparison of the potential environmental effects of the various design iterations is presented in Table 3-7. However, Table 3-7 contains comparison columns only for Design Iterations 1, 2 and 3 and does not provide an equivalent environmental comparison for the final Design Iteration 4. (EIAR Chapter 3, section 3.3.5 and Table 3-7.)

Table 3-7 also contains descriptions that appear fundamentally inconsistent with the Littleton site. The landscape entries refer to turbines on "mountain ridgelines", a "natural topographical mountain basin" and screening afforded by a "mountain basin". Elsewhere, the Littleton landscape is described as predominantly flat peatland within flat to low-rolling terrain. The archaeology entry refers to a "rocky environment".

The Material Assets entries in the same table state for each of the three compared iterations that there are “no telecommunication links or aviation in the area”. Yet the project’s own material-assets assessment identifies fifteen radio links in the study area, and Chapter 3 itself describes telecommunications and aviation constraints that influenced layout design. (EIAR Chapters 3 and 15.)

I do not allege deliberate copying or misconduct. I submit that these objective internal inconsistencies materially reduce confidence in whether Table 3-7 is a reliable, site-specific comparison of the alternatives actually studied for Littleton.

Before placing weight on the conclusion that the chosen layout represents the environmentally preferable solution, I request that the Commission establish why these incompatible descriptions appear in the alternatives table, why the final DI4 layout is absent from the same comparative table, and whether reasonable alternatives involving fewer turbines or a more spatially concentrated layout were properly compared in terms of residential amenity, peat hydrology, biodiversity, peat excavation, road infrastructure and energy yield.

5. Residential visual amenity and the dispersed turbine layout at my dwelling

My dwelling is located at approximately 52.6233884, -7.6671283, at approximately 126 m AOD. Based on the turbine coordinates in Chapter 4, the nearest turbines are approximately: T10 - 1.69 km to the southwest; T9 - 1.78 km to the west-southwest; T11 - 1.85 km to the southwest; and T8 - 1.97 km to the north-northeast. T7 and the remainder of the principal Littleton array extend north and north-northeast from my property.

The spatial relationship is important. My dwelling lies between two substantially separated elements of the proposal: the three Lanespark turbines T9-T11 to the southwest/west-southwest and the principal Littleton array to the north/northeast. I am therefore not facing a single compact array contained within one limited sector of the landscape.

The applicant’s landscape assessment itself recognises the potential for local residents to experience turbines from multiple directions and, at certain viewpoints, acknowledges “visual tension” between the separate Lanespark turbines and the principal Littleton Bog array. My dwelling is in a particularly relevant location for assessing that effect because it lies between those components.

I respectfully request that the Inspector visit my dwelling and principal private amenity area and that of my neighbours and assess views and sequential experience in both directions. Public-road photomontage viewpoints cannot necessarily reproduce the lived residential experience of moving within a dwelling and garden that is positioned between separate turbine groups.

I also request that the Commission consider whether omission, relocation or consolidation of T9-T11, which I believe will have the greatest impact on me, both in terms of noise and visual effects, or another more spatially concentrated layout, was adequately examined. I do not assert that those turbines are technically unnecessary. The question is whether the materially enlarged visual envelope created by retaining the separated Lanespark group is justified when reasonable alternatives are considered.

The reasoning of An Bord Pleanála in Maighne Wind Farm, PA09.300746, is relevant by analogy, although that proposal was materially larger and factually different. In that case the Board considered whether a dispersed cluster-based layout created a disproportionately large visual envelope and whether equivalent generation could be achieved in a more spatially concentrated and less intrusive form. I ask the Commission to apply the planning principle, not to treat the two projects as factually identical.

6. Existing industrial noise, the 2021 baseline and cumulative acoustic burden

Noise is a substantial site-specific concern for me because there is already recurring industrial noise audible at my home from the plastics-recycling operation at the former Bord na Móna Littleton briquette-factory site. I have made formal noise complaints about this disturbance both to the operator of the industrial facility and to Tipperary County Council. The issue is therefore not a hypothetical concern about possible industrial noise; it is an existing residential-amenity problem that I personally experience.

For accuracy, I recognise that the plastics-recycling operation at the former briquette factory is separate from Littleton Wind Farm DAC. The Littleton Wind Farm project is a 50:50 joint venture between Bord na Móna and SSE Renewables, whereas the plastics-recycling operation at the former factory site has been operated in partnership with Sabrina Integrated Services (SIS). The distinction is important because my concern is about the existing industrial noise from that plastics-recycling operation, not noise from the proposed wind farm itself.

This timing is important. The wind-farm background-noise monitoring was undertaken between 18 November and 7 December 2021, more than four years before the present planning application. The plastics-recycling operation at the former briquette factory was already operating by 2019, so I do not suggest that the 2021 survey could not have captured that source. Rather, my concern is that a 2021 baseline may no longer adequately represent the acoustic environment experienced by residents in 2026, particularly where the present operation, its activity levels and the wider industrial context may have changed since the survey. (EIAR Chapter 11, section 11.3.7.)

There is a second, separate issue concerning the 2021 data itself. Public records show that the former Littleton briquette-factory site had been repurposed as a plastics-recycling facility operated by Bord na Móna in partnership with Sabrina Integrated Services (SIS) from 2019. Appendix 11.1 states that “atypical” noise data were removed from monitoring location N4 and that the source of that noise was not apparent from site observations. N4 is at ITM 621749, 652771, approximately 0.83 km from my dwelling. (Appendix 11.1, monitoring protocol and location table.)

I do not assert that the removed N4 data came from the plastics-recycling operation at the former briquette-factory complex. The submitted material does not establish that. However, because the source was unidentified, and because industrial activity was present at the site during the monitoring period, I request that the Commission satisfy itself that the removed data genuinely represented an isolated or unrepresentative event rather than a recurring component of the local industrial sound environment. The underlying time periods, magnitude and rationale for exclusion should be capable of review.

This matters in both directions. If unrelated industrial noise is wrongly included in a background survey it can influence the derived baseline and applicable limits; if recurring industrial noise is wrongly removed as “atypical”, the survey may fail to describe the actual acoustic environment. Separately, even where the 2021 baseline captured the plastics-recycling operation then in existence, a baseline more than four years old may fail to describe material changes in activity or the cumulative lived burden that residents experience when turbine noise is added to the current environment.

The cumulative operational-noise section of Chapter 11 principally assesses contributions from other wind farms, including Lisheen, Graigaman and Ballincurry. I have not identified an equivalent cumulative assessment of operational turbine noise together with the current industrial noise from the plastics-recycling operation at the former briquette-factory site. I therefore request an updated or properly validated acoustic baseline and a property-specific cumulative assessment that takes account of the existing industrial sound presently audible in Derryvella, rather than treating the wind farm in acoustic isolation.

My actual dwelling also does not appear to coincide exactly with the nearest listed noise-sensitive receptor coordinates in Appendix 11.3. The closest identified receptors R333 and R334 are approximately 141 m and 174 m from my supplied dwelling coordinate. I do not claim that the submitted model shows an exceedance at my house. I request that the Commission verify that my actual residence is properly represented and, if not, require calculation of operational and cumulative noise at the actual residential receptor.

Given my documented complaint history, I further request that, if permission were contemplated, any noise condition should provide for enforceable post-commissioning verification at affected dwellings, an accessible complaints procedure, objective investigation of tonal or amplitude-modulated characteristics where reported, and effective curtailment or other remedial action if limits are exceeded. Such conditions should be additional safeguards, not a substitute for an adequate pre-consent assessment.

7. Curlew and ornithological effects, including recreational disturbance

The Curlew issue is identified in the applicant's own surveys and is not speculative. Chapter 7 records a single breeding pair active during each survey year, with a breeding pair at Derryhogan Lakes and Curlew activity within collision-risk and disturbance zones. The closest area used by Curlew is stated to be approximately 70 m from a section of the proposed amenity trail. (EIAR Chapter 7.)

Most importantly, the applicant acknowledges that because the local breeding population is so small, the loss of one breeding adult could in reality lead to loss of the local population. The EIAR states that a single collision fatality must be considered capable of producing a Long-term Very Significant effect.

NPWS consultation also records that operational mitigation for amenity trails may need to include closure during breeding, and that monitoring of recreational behaviour, barriers and possible desire lines away from designated paths may be necessary. This reinforces that the proposed amenity is not environmentally neutral merely because it is recreational.

I request that the Commission apply particular scrutiny to whether the collision-avoidance, disturbance and enhancement measures relied upon are specific, enforceable and demonstrated to be effective at consent stage. Post-construction monitoring and adaptive management should not be used to fill an evidential gap where the applicant itself accepts that a single mortality could have a very significant local consequence.

8. Existing visitor traffic at Lough Doire Bhile and cumulative amenity traffic

The local-road impact of recreational development is an immediate concern for residents of Derryvella. Lough Doire Bhile is already an established and developing public amenity in this locality. Tipperary County Council records that Phase 1 of the wider Littleton Bog tourism initiative includes approximately 7.2 km of trails and car-parking facilities providing access to Lough Doire Bhile, with a wider coordinated trail and tourism network being developed.

From my own day-to-day experience as a resident, the existing amenity already generates increased traffic on the local road serving Derryvella. At busy periods, visitor vehicles and parking create real difficulty for residents entering and leaving their homes and using what remains a rural local road. This is not captured adequately by simply describing baseline traffic volumes as low.

The wind-farm application proposes a further recreational network using internal wind-farm tracks together with approximately 4.0 km of new dedicated amenity tracks. Chapter 15 also proposes a public car park with 15 standard spaces, 3 accessible spaces, designated bus parking and bicycle racks. The EIAR nevertheless states that trip generation from the amenity will be "minimal", characterises operational traffic effects as neutral/imperceptible and states that no mitigation measures are required for operation of the recreational amenity trails. (EIAR Chapter 15, sections 15.5.6-15.5.8.)

I submit that this conclusion should be tested against the actual existing visitor behaviour at Lough Doire Bhile and the Council's explicit intention to increase tourism, dwell-time and interconnected trail use in the area. The appropriate assessment is cumulative: existing lake visitors + Littleton Labyrinth/Littleton Bog Experience traffic + the proposed wind-farm amenity + buses, events and peak weekend use. An annual-average or routine wind-farm-maintenance traffic figure cannot answer that question.

I do not object to public recreation in principle. I object to adding further visitor-generating infrastructure without demonstrating that the access, roads structure, width and parking arrangements will protect the people who actually live on the adjoining local roads. At busy times residents should not be put in a position where they are effectively unable to enter or leave their own homes without delay, nor should emergency access be compromised.

If the Commission were minded to permit the development, I request specific operational traffic and amenity conditions requiring, at minimum: visitor access to be directed to the designated R639 car park; no visitor parking on residential local roads, verges or gateways; an overflow/event parking plan; appropriate directional and no-parking signage; maintenance of emergency and resident access at all

times; monitoring of visitor traffic and parking after opening; and an enforceable mechanism to introduce additional controls where the amenity causes obstruction or material residential disturbance.

9. Grid connection, public-road trenching and long-term road integrity

The grid connection is itself substantial. Chapter 4 identifies an underground 110 kV route approximately 30.9 km long, of which approximately 28.4 km would lie within existing road corridors. Approximately 70 cable joint bays are anticipated, 67 of them in public roads. The joint bays require excavation, reinstatement and subsequent reopening for cable pulling and jointing. (EIAR Chapter 4.)

The Commission should require route-specific evidence concerning existing pavement construction and condition, road widths and edge support, culverts and drainage, trench position and depth, structural loading, reinstatement standards, repeat joint-bay excavation, differential settlement and future maintenance liability. These matters should not be deferred entirely to road-opening licences after the environmental and planning merits have already been determined.

I again refer cautiously to Maighne Wind Farm, PA09.300746. One of the Board's concerns there related to extensive underground cabling in minor public roads and the potential consequences for long-term road integrity, traffic safety and maintenance. The Littleton facts must be assessed on their own evidence, but the decision confirms that extensive public-road trenching is a proper planning consideration rather than a mere construction detail.

I acknowledge that the Littleton EIAR assesses the grid route even though separate consent is intended for the grid connection. My point is therefore not that the applicant ignored the grid route. It is that environmentally and structurally material questions necessary to assess the project as a whole should not be postponed to a later consent or licensing process.

10. Property values, saleability and the intensity of impact at my location

I am concerned that the development may adversely affect the market value and saleability of my home and other highly exposed nearby properties. I recognise that property value is not ordinarily treated as a simple stand-alone planning test and I do not claim a particular percentage loss without a property-specific valuation. However, the applicant has itself chosen to assess property values within Chapter 5, so the evidence it relies upon should be considered consistently.

The EIAR cites a 2023 University of Galway Irish study of wind turbines and house prices. In summarising that study, the applicant records that houses closer to turbines tended to have lower market values, that depreciation was more pronounced within a 2-3 km radius, and that visual intrusion and noise were important contributing factors. The EIAR also reproduces the study's conclusion that turbines can incur a discount on nearby properties and that siting decisions can minimise the price effect. (EIAR Chapter 5, section addressing property values.)

The applicant nevertheless concludes that it is a "reasonable assumption" that Littleton Wind Farm would not impact property values in the area and therefore predicts a long-term imperceptible effect. I submit that this project-level conclusion is not adequately property-specific for the most exposed dwellings.

At my property, T10, T9, T11 and T8 are all within approximately 2 km, with turbine groups occupying materially different sectors to the southwest/west-southwest and north/northeast. My concern is therefore not based on a generic house somewhere in a broad study area, but on a dwelling in very close proximity to four 200 m turbines, with potential visibility in more than one direction and an existing industrial-noise burden.

I ask the Commission to give appropriate weight to the applicant's own cited Irish evidence and to the relationship between property-market effects and the underlying planning impacts of visual dominance, noise, loss of tranquillity and residential amenity. Even if property devaluation is not determinative by itself, a generic "imperceptible" conclusion should not be treated as resolving the saleability and amenity consequences for the closest and most exposed homes.

11. Community engagement and lack of specific near-neighbour benefit information

I attended the public information events in Littleton and previously in Glengoole, and I acknowledge the engagement that has taken place. However, as a nearby resident who will live with this development every day, I still do not have clear, property-specific information from Bord na Móna/SSE about what direct benefit, if any, my household would actually receive.

The project website states that the exact nature and structure of the proposed Community Benefit Fund is not yet known. It envisages a Near Neighbour Fund that may provide residents within a “prescribed distance” with an annual electricity contribution and once-off support for energy-efficiency measures and/or education. Examples given from other schemes include insulation, solar PV, windows and doors, heating upgrades and education support. Chapter 4 similarly says an annual financial payment could be used towards energy bills or retrofits and that education support may be offered. (Littleton Wind Farm Community Benefits information; EIAR Chapter 4.)

Those are potentially meaningful benefits, but at present the material available to residents does not tell me the prescribed distance for Littleton, whether my dwelling qualifies, the annual payment or electricity contribution, the level of retrofit support, the education-support criteria or amount, how long individual near-neighbour payments would continue, or whether any of these elements are guaranteed rather than illustrative examples.

This is especially relevant at my location because four proposed turbines are within approximately 2 km of my home. If community benefit is relied upon as a positive socio-economic effect in the planning balance, the Commission should be able to distinguish between a general future fund and a defined, deliverable benefit for those households bearing the greatest direct effects.

I do not suggest that a community payment can compensate for or make acceptable an otherwise unacceptable environmental effect, nor should planning permission be capable of being bought through benefits. My point is one of transparency and planning balance: where the applicant relies upon community benefit as a positive effect, the nature, eligibility, duration and scale of the near-neighbour measures should be sufficiently defined to allow residents and the Commission to understand what is actually being offered.

12. Entire-project and cumulative assessment

The principal difficulty with this proposal is the combination of effects at one location. Nearby residents are being asked to absorb an actively developing industrial/recreational landscape together with a major wind-energy project. In my case that includes existing industrial noise for which I have already made formal complaints, existing visitor traffic associated with Lough Doire Bhile, proposed additional amenity traffic, turbines in two separated directions, extensive peat and drainage works, public-road grid trenching and a recovering peatland system with sensitive water and bird receptors.

These matters should not be assessed as isolated compartments where each is described as slight, imperceptible or capable of mitigation. The Commission should consider the lived cumulative effect on residential amenity, tranquillity, access, landscape, acoustic environment and long-term character of Derryvella and the surrounding area.

Likewise, the fact that the grid connection is intended to be separately consented should not permit material design, road, hydrological, water-crossing or ecological questions needed for the present EIA, Appropriate Assessment or Water Framework Directive assessment to be postponed. The environmental effects of the project as a whole must be capable of being understood before the principal wind-farm permission is determined.

Conclusion and request

For the reasons set out above, I respectfully request that An Coimisiún Pleanála refuse permission for PAX92.324370.

My objection is based on specific, identifiable issues in the application and on direct residential experience. In particular, I ask the Commission not to grant permission unless it can be satisfied on reliable and site-specific evidence that:

- the drained peat-stability calculations and repository-area risk conclusions are correctly traceable to the Littleton site;
- the wind farm and its permanent infrastructure are compatible with ongoing peatland rewetting and long-term rehabilitation;
- the mitigation on which the applicant's Water Framework Directive conclusions depend will prevent prohibited deterioration;
- the reasonable-alternatives assessment is genuinely site-specific and adequately evaluates the final layout and more concentrated alternatives;
- the residential visual effect at my dwelling, positioned between the Lanespark group and principal array, is acceptable;
- the 2021 noise baseline remains representative, the unexplained N4 data exclusion is justified, and current industrial noise and my actual dwelling are properly included in the cumulative acoustic assessment;
- Curlew collision and amenity-trail disturbance risks are acceptably resolved before consent;
- existing Lough Doire Bhile traffic and the proposed amenity will not create unacceptable cumulative road, parking and resident-access impacts;
- the public-road grid works can be carried out without unacceptable long-term road damage or traffic hazard;
- the project-level conclusion of an imperceptible property-value effect is reasonable for dwellings such as mine with four turbines within approximately 2 km; and
- any claimed near-neighbour/community benefits relied upon in the planning balance are sufficiently defined, transparent and deliverable.

I also respectfully request that the Inspector carry out a site inspection from my dwelling and its principal private amenity area and that of my near neighbours. The location of the property between different sections of the proposed array, together with the existing industrial-noise and local-road context, cannot be fully appreciated from selected public viewpoints or desktop modelling alone.

If the Commission is nevertheless minded to grant permission, I request stringent, enforceable conditions addressing property-specific noise verification and complaints, recreational traffic and parking management, resident/emergency access, peat and water-quality controls, ornithological mitigation and monitoring, and road reinstatement. Conditions should not, however, be used to defer material information that is necessary to determine environmental acceptability before consent.

Yours faithfully,

Mark Webster

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Sources and application documents referred to

The following sources are identified so that the factual points raised above can be checked directly against the planning file and public records. Page/section numbering should be read with the electronic planning documents as lodged. Where a point concerns existing industrial activity at the former briquette factory, the source list distinguishes the plastics-recycling operation from the separate Trifol operation.

- 1. Littleton Wind Farm EIAR, Chapter 3 - Consideration of Reasonable Alternatives. Design Iterations 1-4; Table 3-7; telecommunications/aviation constraints.**
- 2. Littleton Wind Farm EIAR, Chapter 4 - Description of the Proposed Development. Turbine dimensions and coordinates; internal roads; 30.9 km grid route; 70 joint bays; Community Benefit Fund / Near Neighbour Scheme.**

- 3. Littleton Wind Farm EIAR, Chapter 5 - Population and Human Health. Property-value literature and 2023 University of Galway study; project-level property-value conclusion.**
- 4. Littleton Wind Farm EIAR, Chapter 7 - Ornithology. Curlew breeding pair, collision-risk assessment, local effect significance and amenity-trail disturbance.**
- 5. Littleton Wind Farm EIAR, Chapter 8 and Appendix 8.1 - Land, Soils and Geology / Geotechnical and Peat Stability Assessment. Peat excavation/storage; Tables 7-3 and 7-4; repository-area stability information.**
- 6. Littleton Wind Farm EIAR, Appendix 9.2 - Water Framework Directive Compliance Assessment Report. Table N; current, unmitigated and mitigated surface-water status predictions.**
- 7. Littleton Wind Farm EIAR, Chapter 11 and Appendices 11.1/11.3 - Noise and Vibration. November-December 2021 baseline monitoring; N4 data treatment; receptor mapping and operational/cumulative wind-farm noise.**
- 8. Littleton Wind Farm EIAR, Chapter 13 - Landscape and Visual Impact. Local residential visibility, separate turbine groups and visual interaction/tension.**
- 9. Littleton Wind Farm EIAR, Chapter 15 - Material Assets. Amenity trails; 15 standard + 3 accessible parking spaces and bus parking; traffic assessment; grid-road works.**
- 10. Littleton Wind Farm EIAR, Appendix 2.5 - NPWS Consultation. Peat rehabilitation/rewetting, hydrology, peat storage, Curlew and amenity-trail concerns.**
- 11. Littleton Wind Farm project website - Community Benefits. Statement that the exact fund structure is not yet known; illustrative Near Neighbour Fund benefits.**
13. Tipperary County Council, Local Authority Climate Action Plan Progress Report 2024. Trifol Resources facility at the former Bord na Móna briquette factory; approximately 7.2 km of trails and parking access to Lough Doire Bhile / Littleton Bog Experience.
14. Tipperary County Council, 2019 Annual Report; Bord na Móna / Sabrina Integrated Services (SIS) records and related contemporary reporting. The former Littleton briquette factory was repurposed as a plastics-recycling facility in 2019, with Sabrina Integrated Services operating the facility in partnership with Bord na Móna.
15. Bord na Móna / Brown to Green Strategy progress reporting and related public records. Industrial plastics-recycling activity at the former Littleton briquette-factory site was established before the 2021 wind-farm noise survey.
16. Tipperary County Council - Littleton Labyrinth Proposed Greenway / outdoor recreation material. Existing and planned walking/cycling links to Lough Doire Bhile and wider amenity development.
17. Directive 2000/60/EC (Water Framework Directive) and CJEU Case C-461/13, Weser. No-deterioration obligation for individual projects and quality-element test.
18. Directive 2011/92/EU as amended by Directive 2014/52/EU. Environmental impact assessment and reasonable alternatives.
19. Regulation (EU) 2024/1991 on nature restoration. European context for restoration and rewetting of drained peatlands.
20. An Bord Pleanála decision PA09.300746 - Maighne Wind Farm. Planning reasoning concerning dispersed layout/visual envelope and extensive road-based underground cabling; cited by analogy only.
21. Littleton Wind Farm site notice / PAX92.324370 planning file. Formal description of the proposed Strategic Infrastructure Development and associated works.