

To:

An Coimisiún Pleanála

Case Reference: PAX92.324370

Re: Proposed Littleton Wind Farm, County Tipperary

Property: E41 KA00

Formal Objection to Proposed Development

Dear Sir/Madam,

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

I am a resident at **E41 KA00, County Tipperary**, and my property is located within the area that would be materially 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 fully recognise the need for Ireland to transition towards renewable energy and to reduce dependence on fossil fuels.

My objection relates specifically to the **scale, location and cumulative impacts of this particular development**, and to my concern that the application has not demonstrated that these impacts are acceptable or that this particular location represents the most appropriate and proportionate use of the former Bord na Móna lands.

The proposal comprises **11 wind turbines with a maximum blade-tip height of approximately 200 metres**, together with extensive associated infrastructure, including new and upgraded roads, turbine foundations, hardstanding areas, drainage, cabling, substation infrastructure and associated works.

Having reviewed the application documentation, including the Landscape and Visual Impact Assessment, photomontages and Shadow Flicker Assessment, I wish to raise the following objections.

1. Proximity of my property to the proposed turbines

Based upon the location of my property supplied with this objection and the turbine coordinates contained within the applicant's application documents, the approximate distances to the nearest proposed turbines are:

Turbine Approximate distance

T10	1.74 km
T9	1.81 km
T8	1.89 km

Turbine Approximate distance

T11	1.92 km
T7	2.28 km
T6	2.65 km

My property is therefore within approximately 2 km of four proposed turbines of approximately 200 metres in height.

This is not a remote or distant visual relationship. It is a close residential relationship with a development involving structures of exceptional scale.

The applicant's own Landscape and Visual Impact Assessment identifies local residential receptors as highly sensitive visual receptors and states that spatial dominance is most likely to occur within approximately **3 km** of the proposed development.

My property is clearly within this area.

2. The applicant's own photomontages demonstrate substantial visual effects

I consider the applicant's own photomontages to be particularly important evidence.

The applicant's **VP20 viewpoint at Poyntstown** is approximately 1.3 km from T8.

The applicant assesses the visual impact magnitude at this viewpoint as **High-Medium**, with a **Substantial-Moderate, negative and long-term visual effect**.

The photomontage demonstrates the proposed turbines rising prominently above the surrounding landscape.

This is significant because VP20 demonstrates the visual character of the proposed development at a distance considerably closer than my property but within the same general landscape.

3. VP21 is particularly relevant to my property

The applicant's **VP21 viewpoint at Derryhogan** is approximately 1.7 km from T9.

This is extremely similar to the approximately 1.7–1.9 km distance between my property and the nearest proposed turbines.

The applicant's photomontage from VP21 demonstrates several of the proposed turbines clearly visible above the intervening vegetation.

The applicant assesses VP21 as having a **Moderate, negative and long-term visual effect**.

I acknowledge that VP21 is not my property and that the precise view from my dwelling will depend upon orientation, topography and vegetation.

Nevertheless, the viewpoint provides useful evidence of the likely visual prominence of 200-metre turbines from residential locations at approximately the same distance from the development as my property.

I respectfully request that the Board give appropriate weight to this evidence when considering the effect upon E41 KA00.

4. Vegetation does not eliminate the visual impact

The applicant refers in various parts of the assessment to intervening vegetation and hedgerows providing visual screening.

However, the applicant's own photomontages demonstrate that such screening is only partial.

At VP21, substantial vegetation exists between the viewpoint and the turbines, yet the upper portions of the turbines remain clearly visible.

This is particularly relevant to turbines approximately 200 metres high.

Trees and hedgerows:

- vary seasonally;
- can be managed or removed;
- vary in height;
- do not necessarily screen structures of this scale; and
- cannot reliably prevent turbine blades and upper tower sections from appearing above the landscape.

I therefore ask that the Board assess the **actual residual visibility demonstrated by the photomontages**, rather than treating vegetation as an effective mitigation measure in itself.

5. Spatial dominance

The applicant's own assessment states that spatial dominance is most likely to occur within approximately 3 km.

My property is approximately 1.7–1.9 km from four proposed turbines.

This places my property within the very range identified by the applicant as being most susceptible to spatial dominance.

The Board should therefore consider whether the introduction of multiple 200-metre structures into the immediate visual environment of a rural residence would result in an unacceptable alteration to residential visual amenity.

6. Cumulative wind-energy development

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

This is a significant concentration of wind-energy infrastructure.

The proposed 11 turbines should therefore not be assessed as though they were being introduced into an otherwise undeveloped landscape.

The Board should consider the cumulative effect of:

- existing turbines;
- consented turbines;
- the proposed Littleton turbines; and
- any other relevant energy infrastructure.

There is a legitimate planning distinction between saying that a landscape **already accommodates wind turbines** and saying that the landscape **has sufficient remaining capacity to accommodate additional industrial-scale turbines**.

The fact that wind turbines already exist should not automatically be regarded as evidence that further development will have no significant cumulative effect.

Indeed, progressive development may reduce the remaining capacity of the landscape.

7. Progressive industrialisation of the landscape

There is a risk that the landscape is progressively transformed through a series of individually assessed developments, with each application considered capable of being accommodated while the cumulative effect becomes increasingly significant.

The Board should therefore consider whether the Littleton proposal represents a further step towards the **industrialisation of a landscape which is simultaneously being considered for peatland rehabilitation, biodiversity restoration and recreational use**.

This cumulative question is particularly important given the exceptional scale of the proposed turbines.

8. Residential visual amenity

The visual experience of a resident is fundamentally different from that of a person travelling through the area.

A motorist may pass through the landscape in a matter of minutes.

A resident experiences the surrounding landscape repeatedly:

- from their home;
- from their garden;
- from local roads;
- throughout different seasons;
- in different weather conditions; and
- throughout the operational life of the development.

The Board should therefore consider the effect on **long-term residential visual amenity**, rather than simply considering whether the turbines are visible from individual public viewpoints.

9. Shadow flicker – specific relevance to E41 KA00

I have reviewed the Shadow Flicker Assessment submitted with the application and compared the receptor coordinates contained within that assessment with the location of my property supplied with this objection.

The location supplied is approximately **ITM 622537, 652597**.

Of particular concern is that the applicant's Shadow Flicker Assessment identifies a cluster of residential receptors in the immediate vicinity of this location.

The closest identified receptor is **SFAL26**, at approximately 160 metres from the supplied location.

Other identified receptors in the same immediate area include:

- SFAL15 – approximately 267 metres;
- SFAL16 – approximately 277 metres;
- SFAL6 – approximately 310 metres; and
- SFAL7 – approximately 337 metres.

I cannot establish from the publicly available application documents whether one of these receptor numbers represents my dwelling itself or an adjoining property.

I therefore specifically request that An Coimisiún Pleanála require the applicant to identify:

1. which Shadow Flicker Assessment Location corresponds to E41 KA00;
2. the exact coordinates used for that receptor;
3. the distance and bearing from the property to each relevant turbine;

4. which turbines contribute to predicted shadow flicker;
5. the predicted dates and times of potential shadow-flicker events;
6. the relevant façade and window orientations used in the assessment; and
7. whether the actual dwelling and its habitable rooms have been correctly represented.

This is particularly important because the applicant's modelling predicts material theoretical shadow-flicker exposure at several of these nearby receptors.

For example, the applicant predicts theoretical maximum annual exposure of approximately:

- **32 hours 26 minutes at SFAL6;**
- **30 hours 7 minutes at SFAL7;**
- **30 hours 49 minutes at SFAL15;**
- **28 hours 34 minutes at SFAL16; and**
- **16 hours 14 minutes at SFAL26.**

I acknowledge that the applicant subsequently applies weather correction and predicts lower "realistic" annual figures.

However, the theoretical modelling demonstrates that properties in this immediate area are within a zone where shadow flicker is a genuine planning consideration.

10. Shadow-flicker mitigation should be proactive

I understand that the applicant proposes to address shadow flicker through turbine curtailment where shadow flicker is reported and subsequently validated.

I respectfully submit that residents should not be required to become the monitoring mechanism for a newly introduced industrial development.

If permission is granted, I request that any planning conditions require **proactive and automated shadow-flicker control**, based upon the actual dwelling and relevant windows, rather than relying principally upon complaints after the development becomes operational.

11. Noise and residential amenity

I also request that the Board independently examine the noise assessment applicable to E41 KA00.

The assessment should consider not only compliance with numerical noise limits but the change to the existing acoustic environment.

Particular consideration should be given to:

- night-time noise;
- amplitude modulation;

- low-frequency components;
- prevailing background noise;
- wind direction;
- atmospheric conditions; and
- cumulative noise from existing and consented wind-energy developments.

I specifically request that the applicant identify the precise noise assessment receptor representing my property and provide the predicted operational and cumulative noise levels applicable to it.

12. The 800-metre setback should not be treated as proof of acceptable residential impact

I note that the application identifies an approximately **800-metre minimum separation from residential properties**.

However, a minimum separation distance does not in itself demonstrate that residential visual amenity, noise, shadow flicker or the overall residential environment will be protected.

My property would remain approximately 1.7–1.9 km from four turbines of approximately 200 metres in height.

The Board should therefore consider the actual effects upon the property rather than treating compliance with a minimum setback as sufficient evidence that residential impacts are acceptable.

13. Former Bord na Móna lands – a unique opportunity

The proposed development should be considered within the wider context of the former Bord na Móna peatlands.

These lands are undergoing an important transition from their historic industrial use towards:

- peatland rehabilitation;
- rewetting;
- biodiversity restoration;
- walking and cycling;
- recreation;
- tourism; and
- renewable-energy development.

The area therefore represents a unique opportunity to establish a new long-term identity for former industrial peatlands.

I am concerned that this opportunity could be lost if the future character of the landscape is determined through a succession of individual large-scale developments rather than through a coherent strategic plan.

14. Walking and cycling infrastructure

Planning permission has also been granted for walking and cycling infrastructure in the wider area.

The development of such infrastructure demonstrates that the former industrial peatlands have potential to become an important recreational asset.

A walking or cycling route can remain physically accessible while the quality of the recreational landscape is significantly altered by the presence of numerous 200-metre turbines.

The visual experience of the landscape is an important component of recreational amenity.

The Board should therefore consider the cumulative impact of the proposed wind farm upon the future recreational character of these lands.

15. Need for a long-term strategic plan

I respectfully suggest that the circumstances of the former Bord na Móna lands now justify the preparation of a **long-term strategic development and land-use plan** for the wider area.

Such a strategy could identify:

- areas where peatland restoration should be prioritised;
- biodiversity areas;
- recreational and tourism areas;
- walking and cycling corridors;
- areas appropriate for wind energy;
- areas appropriate for solar energy;
- areas suitable for battery storage;
- landscape-sensitive areas; and
- areas where further industrial-scale development should be restricted.

Such a strategy would provide greater certainty for local residents, public authorities and future developers.

16. Strategic planning should determine development – not funding opportunities

I respectfully suggest that the long-term use of these lands should be determined primarily by **strategic planning objectives**, rather than individual development or funding opportunities determining the future use of the landscape on a project-by-project basis.

I am not suggesting that this is necessarily what has occurred with the present application.

Rather, I believe that the principle is important.

The planning process should first establish what represents the most appropriate future use of the former peatlands, having regard to environmental, social, recreational and economic considerations.

Funding and investment opportunities can then be sought to deliver that strategic vision.

This would provide greater confidence that the future of these lands is being determined by long-term planning considerations rather than by whichever development opportunity happens to be available at a particular time.

17. Alternative renewable-energy technologies

I fully recognise Ireland's need for additional renewable electricity generation.

However, the national requirement for renewable energy does not automatically establish that a particular wind farm is the most appropriate form of development in a particular location.

Alternative or complementary technologies include:

- solar photovoltaic generation;
- battery energy storage;
- solar combined with storage; and
- combinations of renewable generation and storage.

I am not suggesting that solar energy is automatically preferable to wind energy.

Rather, where a proposal involves eleven turbines of approximately 200 metres in height in an area already containing significant wind-energy infrastructure, the Board should be satisfied that **reasonable alternatives have been properly considered in the context of the overall future planning strategy for the former peatlands.**

The objective should be to obtain the required renewable-energy benefits while minimising unnecessary environmental, landscape, residential and recreational impacts.

18. Grid capacity and over-development of renewable generation

I also respectfully ask the Board to consider the cumulative relationship between existing renewable generation, consented projects and the additional generation proposed by Littleton.

Ireland's electricity system is undergoing significant investment to accommodate renewable generation.

However, installed generation capacity does not necessarily equate to electricity that can be utilised by consumers at all times.

Periods of constraint and curtailment can occur where renewable generation exceeds available network or system capacity.

I therefore believe it is reasonable for the applicant to demonstrate clearly:

- the additional electricity-system benefit of this particular project;
- the available grid capacity;
- the anticipated connection arrangements;
- the potential for curtailment or constraint;
- the contribution of existing and consented renewable generation; and
- the additional useful generation that Littleton is expected to provide.

This is not an argument against renewable energy.

It is an argument that the **additional environmental and community impacts of each new development should be proportionate to its additional system benefit.**

19. Renewable-energy strategy should be strategic rather than incremental

The need for renewable energy should not result in every suitable parcel of land being developed independently without considering the cumulative consequences.

A strategic approach could determine:

- how much wind generation is appropriate in the area;
- where wind generation should be located;
- where solar generation may be more appropriate;
- where battery storage should be located;
- which areas should be protected for biodiversity and peatland restoration; and
- which areas should be prioritised for recreation and tourism.

Such an approach would provide greater certainty and could potentially achieve renewable-energy objectives while reducing cumulative impacts.

20. Peatland rehabilitation and Substitute Consent

The wider area is also associated with historic peat extraction and the planning issues arising from Substitute Consent.

This makes the need for a coherent future planning strategy particularly important.

The planning system should consider the transition from:

industrial peat extraction → peatland rehabilitation → biodiversity, recreation and appropriate renewable-energy uses

as a coherent long-term process.

It would be unfortunate if the legacy of historic industrial peat extraction were being addressed through one planning process while the future character of the same lands was subsequently determined through a series of unrelated large-scale developments.

21. Overall planning balance

I recognise that Ireland urgently needs renewable energy.

However, national renewable-energy objectives do not remove the requirement to determine whether an individual development represents proper planning and sustainable development in its particular location.

In this case:

- 11 turbines of approximately 200 metres are proposed;
- my property is approximately 1.7–1.9 km from four of the proposed turbines;
- the applicant identifies the potential for spatial dominance within 3 km;
- the applicant's own VP20 viewpoint records a **Substantial-Moderate, negative, long-term visual effect**;
- the applicant's VP21 viewpoint at approximately 1.7 km records a **Moderate, negative, long-term visual effect**;
- the applicant identifies multiple shadow-flicker receptors immediately around the location of my property; and
- the wider landscape already contains a substantial concentration of existing and consented wind-energy development.

These factors warrant careful consideration of whether the cumulative impacts of the proposal are acceptable.

22. Conclusion

I respectfully submit that the proposed Littleton Wind Farm represents a significant intensification of industrial-scale development within a landscape which is already subject to substantial wind-energy development.

My objection is not based upon opposition to renewable energy.

Rather, it is based upon the principle that renewable-energy development should be located and designed in a manner that properly balances:

renewable-energy generation + residential amenity + landscape protection + biodiversity + peatland restoration + recreation + long-term community interests.

I am particularly concerned that the cumulative development of the former Bord na Móna lands is occurring without a sufficiently comprehensive long-term strategy determining how these lands should transition from their former industrial use.

I respectfully request that the Board consider whether a strategic approach would provide a better outcome for the area than allowing individual large-scale developments to progressively determine the future character of the landscape.

I further request that the Board require clarification of the exact noise and shadow-flicker receptors applicable to E41 KA00 and ensure that the property has been correctly represented in the applicant's modelling.

In particular, I ask that the Board does not determine the application on the basis of generalised receptor modelling where the applicant's own assessment identifies a cluster of receptors immediately adjacent to my property and where it has not yet been demonstrated to me that my dwelling has been correctly represented.

Finally, I respectfully ask the Board to consider whether alternative or complementary renewable-energy technologies, including solar generation and energy storage, could contribute to Ireland's renewable-energy requirements with lower cumulative landscape and residential impacts in this particular area.

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

I respectfully submit that the applicant has not demonstrated that the proposed Littleton Wind Farm represents the appropriate balance between renewable-energy generation and the protection of residential amenity, landscape character, recreation, biodiversity and the long-term future of the former peatland landscape.

For these reasons, I respectfully request that **An Coimisiún Pleanála refuse permission for the proposed Littleton Wind Farm.**

Yours faithfully,

Michael Collins, Mary Collins

**Derryvella, Glengoole, Thurles, Tipperary
E41 KA00
09.08.2026**