

To Whom It May Concern,

I wish to object to the proposed Littleton Wind Farm development on the grounds that the application fails to adequately assess, address, or mitigate the existing and ongoing issues of littering, illegal dumping and fly-tipping in the Littleton bog area and surrounding road network. As per the attached evidence.

The Environmental Impact Assessment Report (EIAR) acknowledges the inclusion of a Waste Management Plan within the Construction Environmental Management Plan (CEMP), however this plan relates primarily to construction waste management and does not adequately address litter, fly-tipping, or waste arising during the operational phase of the development.

The proposal includes:

- Approximately 4 km of new walking and cycling trails.
- Additional visitor access infrastructure.
- New and upgraded access roads.
- Additional public parking facilities.
- Increased public access to previously less accessible bogland areas.

Despite these significant changes, the planning application contains no meaningful assessment of the likely effects of increased visitor numbers on litter generation, illegal dumping, or fly-tipping.

Existing Fly-Tipping and Litter Problems

Fly-tipping is not a hypothetical concern in this locality. It is already an established and ongoing environmental problem.

For several years, local residents and volunteers have undertaken repeated clean-up initiatives to remove illegally dumped waste and litter from roadsides, bog access points and surrounding lands.

The attached photographs from community clean-up activities undertaken during 2024 2023 and 2022 to demonstrate the ongoing nature of this problem and the burden currently placed upon volunteers to maintain the area.

These photographs provide clear evidence that:

- Illegal dumping already occurs within the locality.
- Existing access routes are vulnerable to littering and fly-tipping.
- Regular community intervention is necessary to remove waste.
- The problem is persistent rather than isolated.
- Litter removal is costly for local residents who have to dispose of waste.

The fact that local volunteers continue to organise and participate in clean-up events demonstrates that littering and illegal dumping remain unresolved environmental issues.

Failure to Assess Increased Risk

The proposed development would increase access to the boglands through:

- New amenity trails.
- New visitor infrastructure.
- Additional parking areas.
- Improved accessibility to remote locations.

These changes have the potential to significantly increase opportunities for:

- Illegal household waste disposal.
- Illegal dumping of bulky waste.
- General littering.
- Disposal of commercial waste.
- Disposal of garden and construction waste.
- Anti-social behaviour associated with isolated parking areas.

However, I can find no assessment within the EIAR or Natura Impact Statement of these risks.

Absence of an Operational Waste and Litter Management Plan

The application does not appear to contain any detailed operational strategy for managing litter or illegal dumping following completion of the development.

In particular, there is no clear information regarding:

- Public litter bins.
- Dog waste bins.
- Collection frequencies.
- Maintenance schedules.
- Monitoring arrangements.
- Inspection programmes.
- CCTV or surveillance.
- Enforcement measures.
- Reporting systems.
- Removal of illegally dumped waste.

- Funding arrangements for long-term litter management.
- The party responsible for waste removal throughout the operational lifetime of the development.

The Non-Technical Summary merely refers to a Waste Management Plan for project construction activities and does not provide an equivalent operational waste management strategy for visitors using the proposed amenity infrastructure.

Environmental and Natura Concerns

The Natura Impact Statement contains extensive assessment of pollution risks associated with:

- Sedimentation.
- Hydrocarbons.
- Oils.
- Construction runoff.
- Drilling fluids.

However, there appears to be no assessment of:

- Litter entering wetlands.
- Plastic pollution.
- Fly-tipped waste.
- Waste entering drains and watercourses.
- Effects of dumped waste on birds.
- Effects of dumped waste on mammals such as otter.
- Effects of accumulated litter on protected habitats.

Given the documented fly-tipping issues already occurring in the area, this omission is significant.

Inadequate Baseline Assessment

A fundamental principle of environmental assessment is that an applicant must properly understand existing environmental conditions before assessing future impacts.

The planning documentation fails to acknowledge that:

- Fly-tipping is already occurring.
- Community clean-ups have been necessary.
- Existing access routes are already affected by litter and illegal dumping.
- Existing waste problems may worsen as access increases.

Consequently, the applicant has not established an accurate baseline against which future impacts can be assessed.

Requested Conditions and Further Assessment

Should the application be considered further, I respectfully request that An Coimisiún Pleanála require:

1. A dedicated Fly-Tipping Prevention and Management Plan.
 2. A detailed Operational Litter Management Plan.
 3. A formal assessment of the effects of increased public access on waste generation.
 4. Identification of existing fly-tipping hotspots.
 5. Regular inspection and monitoring of trails and parking areas.
 6. Clearly defined responsibility for litter collection and illegal waste removal.
 7. Funding arrangements for long-term maintenance.
 8. Appropriate surveillance and enforcement measures where necessary.
 9. Annual reporting of fly-tipping and litter incidents.
 10. Assessment of impacts on habitats, water quality and protected species arising from litter and fly-tipped waste.
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Conclusion

The application recognises construction waste management but fails to adequately address the existing and recurring problem of litter and fly-tipping in the Littleton area. The attached photographic evidence from community clean-up events demonstrates that illegal dumping is already a persistent environmental issue.

By increasing public access, providing new parking facilities and opening additional routes into the boglands, the proposed development has the potential to exacerbate existing waste problems. Yet the planning documentation contains no comprehensive operational strategy to prevent, monitor or manage these impacts.

For these reasons, I respectfully request that permission be refused, or alternatively that substantial further information be sought before any decision is made.

Yours faithfully,

Patrick Hayes

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The following pictures were taken over time on a 300m stretch along the road in the Leigh area.

Along with a sign erected by myself after discussions with local county representative to address such problems.

April 2023





May 2022.



