

PLANNING OBSERVATION

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Glengoole,
Thurles,
Co.Tipperary.

An Coimisiún Pleanála
Marlborough St
Dublin 1 D01
County Dublin

10th Aug 2026

Re: proposed Littleton Wind Farm comprising of 11 no. turbines and all associated works.

To Whom it may concern,

I would like to bring to attention of An Coimisiún Pleanála that: Environmental Impact Assessment Report (Eiar) submitted is incomplete and inaccurate in reflecting the extents of the negative impact the proposed development will have on the local rural settlement Glengoole / New Birmingham and Reen Road Picnic viewing area. The proposed development fails to satisfy planning policy set out in the Tipperary County Development Plan 2023-2028.

Policies:

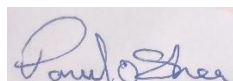
11-16: Facilitate new development which integrates and respects the character, sensitivity and value of the landscape in accordance with the designations of the Landscape Character Assessment, and the schedule of Views and Scenic Routes (or any review thereof). Developments which would have a significant adverse material impact on visual amenities will not be supported.

11-17: Ensure the protection of the visual amenity, landscape quality and character of designated 'Primary' and 'Secondary' amenity areas. Developments which would have a significant adverse material impact on the visual.

As part of this observation, please see enclosed document: **Proposed Littleton Wind Farm, Co. Tipperary. Observation – Incomplete Eia / Visual Impact Assessment Glengoole / New Birmingham, Reen Rd Viewing Area - Assessment of Visual Effects on Landscape.**

Yours Faithfully

Paul O Shea.



PROPOSED LITTLETON WIND FARM, CO. TIPPERARY.

Observation – Incomplete EIA / Visual Impact Assessment

Glengoole / New Birmingham, Reen Rd Viewing Area - Assessment of Landscape & Visual Effects.

Date: August 2026

Prepared By:

Paul O' Sheas

B.Arch

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Introduction

Regarding the potential effects of the proposed Littleton Wind Farm Development on the landscape and visual amenity of the receiving environment. This observation is supported by photomontages included in this document highlighting the landscape and visual impact on the landscape context of the proposed development providing additional information to An Coimisiún Pleanála for assessment. This additional information is critical to consider likely landscape and visual effects of the scheme on the receiving environment in particular Glengoole / New Birmingham and the Reen road viewing point. This observation brings to the attention of An Coimisiún Pleanála information which has not been furnished by the applicant, necessary for comprehensive assessment of performance of the proposed development satisfying criteria set out in Tipperary County Development Plan 2022-2028 - Tipperary Landscape Character Assessment 2016. Policies and objectives in relation to the landscape are contained within subsection 11.9 and 11.10 of the current development plan. Those deemed most relevant to the project are included below;

Policies:

11-16: *Facilitate new development which integrates and respects the character, sensitivity and value of the landscape in accordance with the designations of the Landscape Character Assessment, and the schedule of Views and Scenic Routes (or any review thereof). Developments which would have a significant adverse material impact on visual amenities will not be supported.*

11-17: *Ensure the protection of the visual amenity, landscape quality and character of designated 'Primary' and 'Secondary' amenity areas. Developments which would have a significant adverse material impact on the visual.*

Statement of Authority:

The Landscape and Visual Impact Assessment included in this observation was prepared by Paul O’Shea who has over 10 years professional experience mapping, drawing and modeling landscapes as necessary for Planning and Development Regulations 2001-2016 compliance as part of large scale strategic developments, holding a Bachelor of Science in Architecture. **B.Arch,**

Landscape & Visual Effects

In this chapter I will set out criteria established in the environmental impact assessment report (EIAR) for the proposed Littleton Wind Farm, Co. Tipperary Volume 2 - Main EIAR Chapter 13 - Landscape and Visual Impact report submitted by Littleton Wind Farm DAC. The criteria and headings hereinafter are deemed necessary to weigh up the importance of the independent findings enclosed as part of this observation. All references to mentioned document above will be denoted as submitted Doc-EIAR-13.

As highlighted in the EIA visual impact assessment: the distinction between landscape effects and the visual effects of development are derived from the interplay between the physical, natural and cultural components of surroundings. Combinations of these elements and spatial distribution create distinct character of landscape in different places. Local area character is more than physical features that make up a landscape. Places of human interaction accentuated by natural beauty inherent in surrounding landscapes enhance experiences of place defined by geographical location, natural elements and the passage of time.

As outlined in submitted Doc-EIAR-13: section 13.2.7.1.2_ Value Associated with the View. The following circumstance, conditions and criteria are attributed to value associated with “ The View “.

- **Scenic values** of views are designated in County Development Plans, guidebooks, touring maps and postcards as some examples of a non-exhaustive list of accessible publications and information which document areas of visual value strongly valued by people.
- **Sensitive landscape views** are usually outlined in County development plans landscape character assessments subject to public consultation with those who articulate a necessity for such designation unknown to the Local Authority.
- **Intensity of use** and popularity are not conducive in establishing view value at regional, national level.
- **Connection with the landscape** is determined by activities and responses of person’s observing and moving through it
- **Provision of elevated panoramic views** facilitate growing appreciation of the surrounding landscape at locations with broad vistas.
- **Sense of remoteness and/or tranquil** viewing locations heighten amenity value having lower intensity of development

- **Degree of perceived naturalness.** Views and landscapes valued for natural appearances are highly sensitive to visual intrusion by obvious human interventions.
- **Presence of striking or noteworthy features.** Views are valued because of distinctive and memorable landscape features.
- **Historical, cultural or spiritual value.** Viewing locations with human anthropocentric meaning imbued attract visitors for the purposes of contemplation and reflection heightening senses of the surrounding environment and landscape.
- **Rarity or uniqueness of the view.** Landscape types and uniqueness of views might be of importance at local or national levels.
- **Integrity of the landscape character in view.** The condition of the landscape in view relating to human interventions and whether the landscape pattern is regular or irregular.
- **Sense of place.** Sense of wellbeing at the viewing location
- **Sense of awe.** Does the view inspire an overwhelming sense of scale or the power of nature. “Those locations where highly susceptible receptors or receptor groups are present, and which are deemed to satisfy many of the view value criteria above are likely to be judged to have a high visual sensitivity and vice versa.” Doc-EIAR-13_ page 10.

Magnitude of Visual Effects is determined by the magnitude of visual effects is determined by the visual presence effect of the proposal on visual amenity. Visual presence is determined by noticeability the proposal is within a given view. Scale, complexity, existing contextual movement such as observation of wind turbines. The context and siting of existing context and focal points with dominant features are also accounted. The intensity and visual presence of the development can be described minimal or highly dominant. See section 13.2.7.2 Magnitude of Visual Effects, Doc-EIAR-13.

Assessment Criteria for Cumulative Impacts

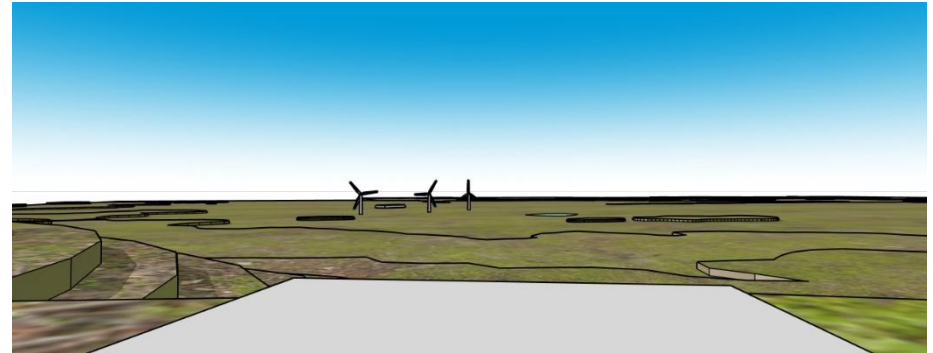
As outlined guidelines for assessing the cumulative landscape and visual impact of onshore wind energy developments consider cumulative effects as non-static due to the evolving nature of planning and development processes. Cumulative effects are experienced in terms of landscape character and how wind energy developments can contribute to an increasing sense of prolific land use intensification. Visual amenity with additional wind farm use might generate visual clutter, tension, and ambivalence effecting perception of landscapes. Turbines from a Proposed Development that are seen stacked in perspective against the turbines of nearer or further developments tend to cause visual disharmony and confusion. See section 13.2.8 Assessment Criteria for Cumulative Impacts, Doc-EIAR-13.

Reen Viewing Area

Location- View No.1

- **Scenic values of views** – View looking over Tipperary plains towards Maugherslieve Mountain at 543m above sea level
- **Sensitive landscape views** - Maugherslieve Mountain is Class 5 - Table 5.2 Sensitivity Rating of Landscape Character Area. (C.D.P)
- **Intensity of use and popularity** - Local, regional, national & international.
- **Connection with the landscape** – Observation and reflection, communal dining picnic area provided.
- **Provision of elevated panoramic views** - 180° panoramic
- **Degree of perceived naturalness** - non interrupted
- **Presence of striking or noteworthy features**- North Tipperary highlands.
- **Historical, cultural or spiritual value** - The Druids Altar: remains of megalithic structure sited above picnic area at 293m above sea level. TS048-041: Megalithic structure Observable from viewing area.
- **Rarity or uniqueness of the view** - The only designated viewing point on the Slieveardagh Hills sitting at 253m above sea level.
- **Sense of place** - Local Amenity and music traditional music venue.
- **Sense of awe** – un – paralleled Sunset.

CGI image of computer-generated contour model



Compass mobile app image



CAD contour drawing with view direction

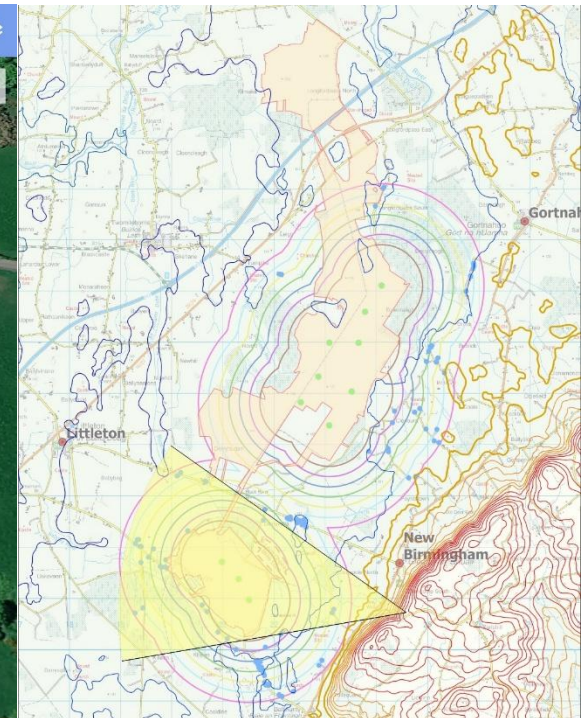


Photo of existing landscape.



Photomontage of proposed windfarm.

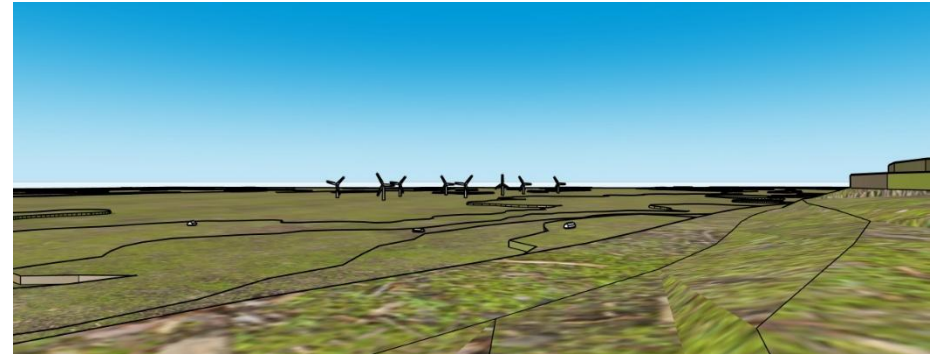


Reen Viewing Area

Location- View No.2

- **Scenic values of views** –Glengoole / New Birmingham in the middle ground and Arderin mountain 527m above sea level in the background.
- **Sensitive landscape views** -Class 2/ Class 5 - Table 5.2 Sensitivity Rating of Landscape Character Area. (C.D.P)
- **Intensity of use and popularity** - Local, regional, national & international.
- **Connection with the landscape** – Observation and reflection, communal dining picnic area provided.
- **Provision of elevated panoramic views** - 180° panoramic
- **Degree of perceived naturalness** – Historical village development and cumulative Impacts of wind farms at Lisheen and Brukrana.
- **Presence of striking or noteworthy features**- Glengoole Village.
- **Historical, cultural or spiritual value** - The Druids Altar: remains of megalithic structure sited above picnic area at 293m above sea level. TS048-041: Megalithic structure. Observable from viewing area.
- **Rarity or uniqueness of the view** - The only designated viewing area on the Slieveardagh Hills sitting at 253m above sea level.
- **Sense of place** - Local Amenity and music traditional music venue.
- **Sense of awe** – Sense of community and connection to village.

CGI image of computer-generated contour model



compass mobile app image



CAD contour drawing with view direction

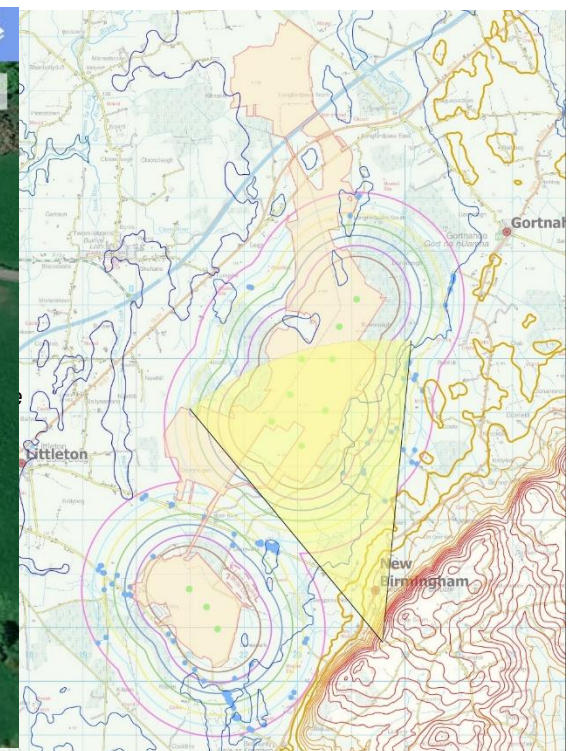


Photo of existing landscape



Photomontage of proposed windfarm.

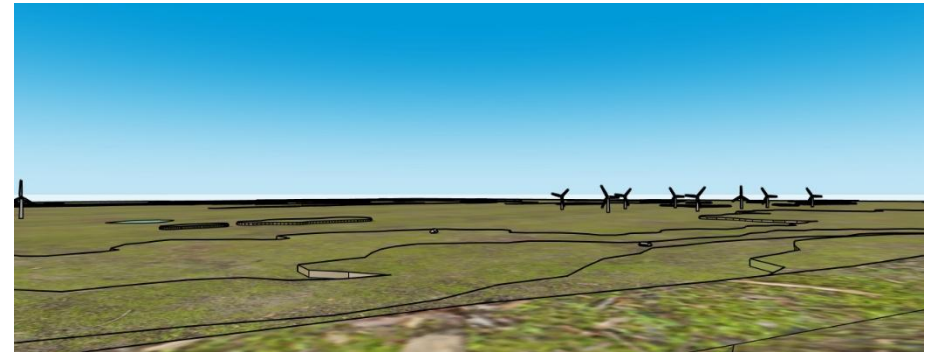


Reen Viewing Area

Location- View No.3

- **Scenic values of views** –Devils Mountain at 480m above sea level. Gleng
- **Sensitive landscape views** -Class 5 - Table 5.2 Sensitivity Rating of Landscape Character Area. (C.D.P)
- **Intensity of use and popularity** - Local, regional, national & international.
- **Connection with the landscape** – Observation and reflection, communal dining picnic area provided.
- **Provision of elevated panoramic views** - 180° panoramic
- **Degree of perceived naturalness** – Non interrupted views over the Tipperary plains.
- **Presence of striking or noteworthy features**- Devils Bit.
- **Historical, cultural or spiritual value** - The Druids Altar: remains of megalithic structure sited above picnic area at 293m above sea level. TS048-041: Megalithic structure. Observable from viewing area.
- **Rarity or uniqueness of the view** - The only designated viewing area on the Slieveardagh Hills sitting at 253m above sea level.
- **Sense of place** - Local Amenity and music traditional music venue.
- **Sense of awe** - place and connection to village.

CGI image of computer-generated contour model



Compass mobile app image

CAD contour drawing with view direction

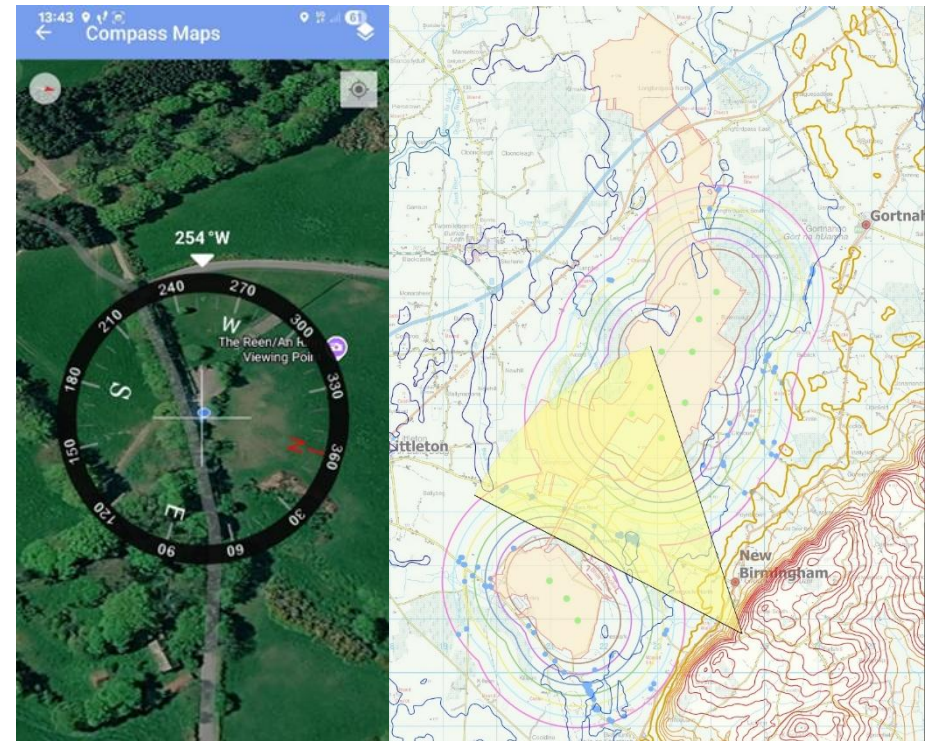


Photo of existing landscape.



Photomontage of proposed windfarm.

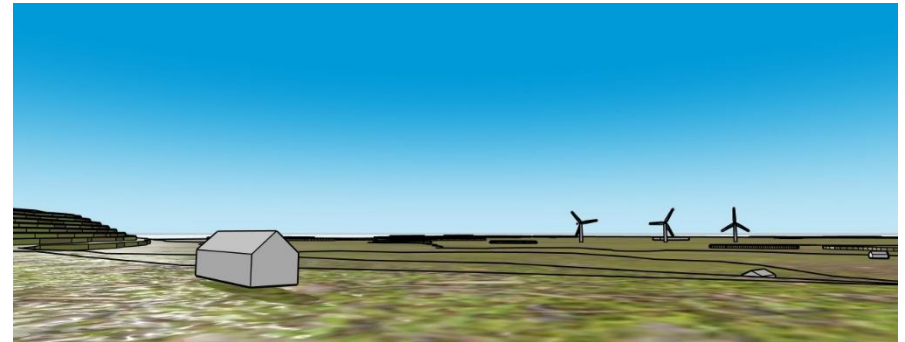


Glengoole Church

Location- View No.4

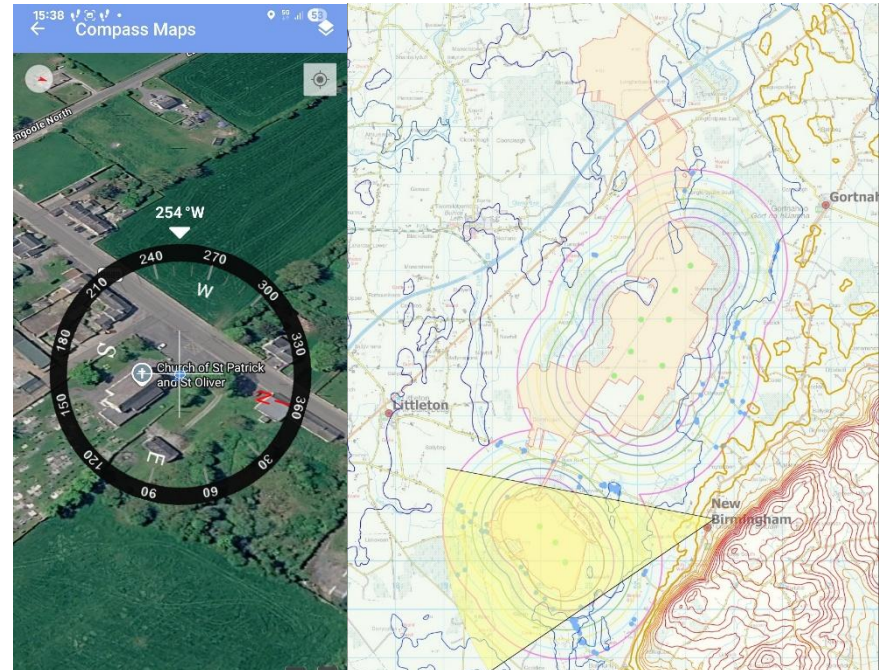
- **Scenic values of views** – Killough Hill at 197m above sea level northwest to the west. Kill Hill at 222m and Galtymore Mountains at 917m above sea level to the southwest.
- **Sensitive landscape views** - Class 5 - Table 5.2 Sensitivity Rating of Landscape Character Area. (C.D.P)
- **Intensity of use and popularity** - Local, regional, national.
- **Connection with the landscape** – reflection due to spiritual setting of church on site.
- **Provision of elevated panoramic views** - 180° panoramic
- **Degree of perceived naturalness** – Glengoole Village & cumulative impacts of wind farms at Kill Hill detract perceived naturalness. Undisturbed naturalness to west
- **Presence of striking or noteworthy features**- Killough Hill to north west.
- **Historical, cultural or spiritual value** – Church settlement and burial ground since 1815.
- **Rarity or uniqueness of the view** – elevated village.
- **Sense of place** - Quaint rural Irish Village.
- **Sense of awe** - Sunset

CGI image of computer-generated contour model



Compass mobile app image

CAD contour drawing with view direction







Appraisal

As outlined in Doc-EIAR-13: Table 13.5 provides Macro Works' criteria for assessing the magnitude of cumulative impacts, which are based on the SNH Guidelines (2012). The criteria set best associated to the effects on the landscape of New Birmingham / Glengoole can be best compared to very high which states:

Very High - The proposed wind farm will strongly contribute to wind energy development being the defining element of the surrounding landscape. It will strongly contribute to a sense of wind farm proliferation and being surrounded by wind energy development. Strongly adverse visual effects will be generated by the proposed turbines in relation to other turbines.

This is very notable from the imagery provided as part of this visual impact assessment indicated the current impact on the natural characteristics from cumulative wind farm development to the southwest at Kill Hill (16,no), to the northwest at Brittas (10,no), and to the northeast at Brukrana and Lisheen (54,no) totaling 80 no. wind turbines on the surrounding landscape and to account for current planning permissions.

As outlined in Doc-EIAR-13

- Areas 'Open For Consideration' – "wind energy development in these areas may or may not be appropriate, depending on the character of the landscape and the potential impact of the Proposed Development. Any impact on the environment must be low and subject to proper planning and sustainable development, and the guidelines set out in this policy document.
- Areas 'Unsuitable for Further Development' – "new wind energy development in these areas is not permitted. These areas have a special or unique landscape character where the main objective is conservation.

Views of Recognized Scenic Value: Views of recognized scenic value are primarily indicated within Tipperary County Development Plan 2023-2028. Table A. The Reen road picnic/viewing area has not been specifically designated as place of intrinsic scenic value but adjacent areas have been identified as having scenic views/routes designations. View 31: Views to the west between Glengoole and Ballysloe, along R689 and View 29: Views to the south along road R691. These views do not compare to views offered in Glengoole / New Birmingham / Reen Road Picnic / Viewing Area. As mentioned above earlier

- Scenic values of views are designated in County Development Plans, guidebooks, touring maps and postcards as some examples of a non-exhaustive list of accessible publications and information which document areas of visual value strongly valued by people.

- Sensitive landscape views are usually outlined in County development plans landscape character assessments subject to public consultation with those who articulate a necessity for such designation unknown to the Local Authority.

Definitions:

Landscape Value and Sensitivity results

High: Areas where the landscape character exhibits a low capacity for change in the form of development. Examples of which are high value landscapes, protected at a national or regional level (Area of Outstanding Natural Beauty), where the principal management objectives are likely to be considered conservation of the existing character.

Very High Change: that would be large in extent and scale with the loss of critically important landscape elements and features, that may also involve the introduction of new uncharacteristic elements or features that contribute to an overall change of landscape in terms of character, value and quality.

Visual Sensitivity: Unlike landscape sensitivity, visual sensitivity has an anthropocentric basis. Visual sensitivity is a two-sided analysis of receptor susceptibility (people or groups of people) versus the value of the view on offer at a particular location. To assess the susceptibility of viewers and the amenity value of views, the assessors use a range of criteria

and provide a four point weighting scale to indicate how strongly the viewer/view is associated with each of the criterion. Susceptibility criteria is extracted directly from the IEMA Guidelines for Landscape and Visual Assessment (2013), whilst the value criteria relate to various aspects of a view that might typically be related to high amenity including, but not limited to, scenic designations. These are set out below:

This is one of the most important criteria to consider in determining overall visual sensitivity because it is the single category dealing with viewer susceptibility. In accordance with the IEMA Guidelines for Landscape and Visual Assessment (3rd edition 2013) visual receptors most susceptible to changes in views and visual amenity are;

- Residents at home;
- People, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focused on the landscape and on particular views;
- Visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience;

Local Area Amenity & Characteristics – Images- A.

Glengoole / New Birmingham – *A village 160m-170m
above sea level and 50m elevated above proposed development site.*



Local Area Amenity & Characteristics – Images – B.

The Reen Viewing Area – A picnic area and traditional music performance area 250m above sea level and 130m elevated above proposed development site.



Conclusion

The visual impact assessment submitted as part of the EIAR for the proposed planning permission for the Littleton Wind farm project was inadequate in describing the visual impact and effects of the development on the Community of Glengoole / New Birmingham local area characteristics spatial amenities. This in part is due to the unsatisfactory exclusion of the Reen Viewing area as a designated view of scenic value in the Local Development Plan 2023-2028 appendix 3 Landscape Character assessment and schedule of routes and views. As outlined above that scenic values of views are designated in County Development Plans, guidebooks, touring maps and postcards of sensitive landscape views. All do usually outlined in County development plans landscape character assessments are subject to public consultation with those who articulate a necessity for such designation unknown to the Local Authority. This would seem that in this instance the onus has fallen on the local community to bring to light the regional, national and international value of this unique site. The Reen viewing area encompasses a rare geographic location and is one of few established viewing areas in the Slieveardagh Hills and is of specific national value. The area is in a rich historic area with 2 neighbouring sites on the national monuments record:

Dernaflan and Derryville. The Rock of Cashel in a UNESCO world heritage site. The Devil's Bit viewing area and Glengoole Hill both have Holy Year crosses on top of them and are directly opposite each other across the planes of Tipperary. The onus is now with An Coimisiún Pleanála to assess this situation and determine the negative impact of the proposed development on the last remaining bog land in Tipperary without wind turbines distorting this last remaining vista. The current cumulative impact of wind farms in this particular region is eroding the visual amenity of the landscape inhibiting local areas to facilitate sustainable futures. Effects on tourism due to current cumulative intensive land use should be considered.

Development Plan Planning Policies.

11-16: Facilitate new development which integrates and respects the character, sensitivity and value of the landscape in accordance with the designations of the Landscape Character Assessment, and the schedule of Views and Scenic Routes (or any review thereof). Developments which would have a significant adverse material impact on visual amenities will not be supported.

11-17: Ensure the protection of the visual amenity, landscape quality and character of designated 'Primary' and 'Secondary' amenity areas.

Photomontage – Methodology

Contour Cad drawings & Computer

Generated full scale project models

models generated from

Map 20250828_Littleton_Final_Layout_

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