SUBMISSION TO AN COIMISIÚN PLEANÁLA

Re: Littleton Wind Farm Strategic Infrastructure Development Application

Case Reference: PAX92.324370

Location: Townlands including Longfordpass, Derryhogan, Derryvella, Ballybeg, Lanespark, Newhill and Killeen, County Tipperary

Applicant: Littleton Wind Farm DAC

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1. Introduction

This submission is made in relation to the Strategic Infrastructure Development planning application by Littleton Wind Farm DAC for the proposed Littleton Wind Farm, County Tipperary. The proposed development comprises 11 wind turbines, associated infrastructure and site works, including turbine foundations, crane hardstanding areas, internal access tracks, drainage infrastructure, an onsite substation, peat and spoil management areas, vegetation clearance, amenity facilities and biodiversity enhancement measures (Fehily Timoney, 2026a).

This submission is not an objection to renewable energy in principle. Rather, it concerns the appropriateness and evidential basis of this particular proposal in this specific location. The proposed wind farm would be located within and around a former industrial peatland landscape that is now in a post-extraction phase, where rehabilitation, hydrology, biodiversity, carbon emissions, cultural landscape, community amenity and future land-use choices are all live planning considerations.

Environmental Protection Agency guidelines state that an Environmental Impact Assessment Report (EIAR) should identify, describe and assess the direct and indirect significant effects of a project across environmental factors, while also setting out the reasonable alternatives studied by the developer and the main reasons for the option chosen (Environmental Protection Agency, 2022).

This submission focuses on three linked grounds:

1. Future Rehabilitation Trajectory: the future rehabilitation trajectory of the Littleton Bog Group, particularly the treatment of Lanespark Bog following Phase 1 rehabilitation and its exclusion from Phase 2 enhanced rehabilitation.

2. Ecological Risk: ecological risk, including the potential implications for Curlew and other species of conservation concern under the Precautionary Principle.

3. Community and Landscape: the future of the local community, landscape and adjoining lands in a recovering post-peat landscape.

The central concern is that the EIAR adopts the Phase 1 rehabilitated condition as the baseline receiving environment, whereas Bord na Móna rehabilitation documentation indicates that Lanespark was mapped as a constraint because it is included in the proposed Littleton Wind Farm footprint, with only Ballybeg and Derryvella considered for Phase 2 enhanced rehabilitation (Bord na Móna, 2025). The Commission should not treat that baseline as environmentally inevitable unless the applicant demonstrates that enhanced rehabilitation alternatives for Lanespark were transparently assessed and reasonably excluded.

2. Summary of Submission

This submission raises three linked planning concerns.

2.1 Future Rehabilitation Trajectory

The proposed development is being assessed in a former industrial peatland landscape where the post-extraction future is not fixed. Bord na Móna's rehabilitation documentation distinguishes between standard rehabilitation, which is directed toward environmental stabilisation under EPA IPC Licence Ref. P0499-01, including Condition 10.2, and enhanced rehabilitation under the Peatlands Climate Action Scheme (PCAS), which is intended to deliver additional climate, hydrological, biodiversity, water-quality and ecosystem-service benefits (Bord na Móna, 2022; Bord na Móna, 2025).

This submission does not suggest that the applicant, Littleton Wind Farm DAC, or the landowner, Bord na Móna, is legally obligated through this planning application to deliver PCAS Phase 2 enhanced rehabilitation at Lanespark. The issue is narrower: whether the EIAR provides a transparent assessment of the future rehabilitation trajectory being displaced, limited or relied upon by the proposed wind-farm land use.

The available rehabilitation documentation confirms that Phase 1 rehabilitation was undertaken across Ballybeg, Lanespark and Derryvella between 2018 and 2021. It also confirms that Lanespark was mapped as a constraint because it is included in the proposed Littleton Wind Farm footprint, and that only Ballybeg and Derryvella were considered for Phase 2 enhanced rehabilitation in the 2025 rehabilitation plan (Bord na Móna, 2025).

The central issue is therefore not whether Phase 1 rehabilitation occurred. The issue is whether the EIAR and supporting material adequately evaluate a receiving environment whose future rehabilitation trajectory may already have been constrained by the proposed wind-farm land use.

2.2 Ecological Risk and Conservation Principles

The ecological assessment should not be limited to direct habitat loss or modelled collision risk alone. The receiving environment includes species of conservation concern, including Eurasian Curlew, whose Irish breeding population has undergone severe decline. For bird receptors, relevant impact pathways may include collision, displacement, disturbance, barrier effects, habitat loss, cumulative impacts and potential population-level consequences (Curlew Task Force, 2019; Scottish Natural Heritage, 2018).

Those impact pathways are consistent with the broader requirement that an EIAR assess significant direct and indirect effects across environmental factors, including the interactions between them (Environmental Protection Agency, 2022). In the case of an endangered or isolated breeding population, a low modelled annual collision probability should not be evaluated in isolation from the severity of consequence. The assessment should demonstrate that the proposed development would not materially undermine local occupancy, breeding productivity, habitat use or future recovery potential (Curlew Task Force, 2019; Scottish Natural Heritage, 2018).

2.3 Community, Landscape and Future Land Use

The proposed development should be assessed as a long-term land-use decision for a recovering peatland and rural community landscape. The proposal would introduce turbines, hardstands, tracks, drainage infrastructure, an onsite substation and associated works into a landscape that is already transitioning from industrial peat extraction toward rehabilitation, biodiversity recovery, amenity use and possible future community and land-use functions (Bord na Móna, 2025; Fehily Timoney, 2026a).

This submission does not argue that renewable energy is unnecessary or undesirable. It argues that this particular proposal requires closer scrutiny because the applicant has not adequately demonstrated that the proposed wind-farm layout is compatible with the best reasonably achievable future rehabilitation trajectory for Lanespark and the wider Littleton Bog Group (Bord na Móna, 2022; Bord na Móna, 2025).

The residential and adjoining-land context is also relevant. The verified spatial material prepared for Appendix D records that the Rafter family house at Derryvella is within approximately 2 km of four proposed turbines, within approximately 3 km of seven proposed turbines, within approximately 4 km of nine proposed turbines, and within approximately 5 km of all 11 proposed turbines. This proximity evidence is not advanced as a standalone private-view objection, but as relevant context for residential amenity, adjoining lands, landscape character, cumulative visibility and the combined lived effect of the proposed development.

In summary, the Commission should not accept the Phase 1 rehabilitated condition of Lanespark as the complete future baseline, or the proposed turbine layout as an adequately assessed long-term land-use outcome, unless the applicant demonstrates that enhanced rehabilitation alternatives, residential amenity, adjoining land-use effects, community amenity, ecological recovery and cumulative landscape impacts have been transparently assessed.

3. Ground 1: Future Rehabilitation Trajectory of the Littleton Bog Group

3.1 Issue

The first ground of this submission concerns the future rehabilitation trajectory of the Littleton Bog Group, and in particular the treatment of Lanespark within the applicant's environmental baseline.

The issue is not whether Lanespark has already been subject to rehabilitation works. The available evidence indicates that Phase 1 rehabilitation was undertaken across Ballybeg, Lanespark and Derryvella between 2018 and 2021, and that those works formed part of the standard environmental stabilization required under EPA IPC Licence Ref. P0499-01, including Condition 10.2 (Bord na Móna, 2025).

The issue is whether the EIAR has adequately assessed the future environmental trajectory of Lanespark in circumstances where Bord na Móna's rehabilitation documentation distinguishes between standard rehabilitation and enhanced rehabilitation under the Peatlands Climate Action Scheme (PCAS). The PCAS methodology identifies enhanced rehabilitation as involving additional measures intended to deliver climate, hydrological, biodiversity, water-quality and ecosystem-service benefits beyond standard licence-compliance rehabilitation (Bord na Móna, 2022).

The 2025 Ballybeg/Lanespark/Derryvella rehabilitation documentation indicates that Lanespark was mapped as a constraint because it is included within the proposed Littleton Wind Farm footprint, with only Ballybeg and Derryvella considered for Phase 2 enhanced rehabilitation (Bord na Móna, 2025). That creates an important baseline question for the Commission: whether Lanespark's Phase 1 rehabilitated condition should be treated as the complete future baseline, or whether the proposed wind-farm land use has limited the rehabilitation trajectory being presented and assessed.

This submission does not argue that Littleton Wind Farm DAC, Bord na Móna or any other party is legally required through this planning application to deliver PCAS Phase 2 enhanced rehabilitation at Lanespark. The point is narrower. Where a proposed wind-farm footprint has been used as a constraint in rehabilitation planning, the EIAR should transparently explain what environmental trajectory is being relied upon, whether enhanced rehabilitation alternatives were evaluated, and why the Phase 1 condition is treated as an appropriate baseline for assessment.

Without that explanation, the Commission cannot be satisfied that the EIAR has fully evaluated the reasonable future condition of the receiving environment. The EPA Guidelines require an EIAR to address the interaction between relevant environmental factors, including land, soil, water, biodiversity, climate, landscape, population and human health (Environmental Protection Agency, 2022).

3.2 Evidence

The available evidence shows that Ballybeg, Lanespark and Derryvella form a closely linked rehabilitation planning unit within the Littleton Bog Group. The 2025 Ballybeg/Lanespark/Derryvella rehabilitation plan states that Lanespark is located between Ballybeg and Derryvella, and that the three bogs are closely linked (Bord na Móna, 2025).

The same rehabilitation plan records that industrial peat production at Ballybeg, Lanespark and Derryvella ceased in 2017, and that Phase 1 rehabilitation was undertaken between 2018 and 2021. Those works included extensive drain blocking and hydrological management and were carried out as standard peatland rehabilitation to meet the requirements of EPA IPC Licence Ref. P0499-01, including Condition 10.2 (Bord na Móna, 2025).

The 2025 rehabilitation plan also distinguishes clearly between Phase 1 rehabilitation and Phase 2 enhanced rehabilitation. It states that Lanespark was rehabilitated during 2018–2021, but is not proposed for Phase rehabilitation because Bord na Móna and SSE are developing the proposed Littleton Wind Farm across

Lanespark Bog, Littleton Bog and part of Longfordpass. The plan further records that Lanespark was mapped as a constraint on rehabilitation maps because of the proposed wind farm footprint, leaving only Ballybeg Bog and Derryvella Bog considered for Phase 2 measures in the 2025 plan (Bord na Móna, 2025).

The timing of that documentation is relevant. The 2025 rehabilitation plan describes the Littleton Wind Farm project as being in pre-planning and expected to be submitted for planning permission in 2026 (Bord na Móna, 2025). The Strategic Infrastructure Development application for the proposed Littleton Wind Farm was subsequently submitted to An Coimisiún Pleanála in June 2026 (Fehily Timoney, 2026a). This does not prove that Lanespark would otherwise have received Phase 2 enhanced rehabilitation. It does, however, show that the proposed wind-farm footprint was already being treated as a rehabilitation constraint before the formal planning application was lodged.

The PCAS methodology provides important context for why this distinction matters. Bord na Móna's methodology paper distinguishes standard rehabilitation from enhanced rehabilitation. Standard rehabilitation is directed toward Condition 10 licence requirements and environmental stabilization. Enhanced rehabilitation is described as a separate set of additional measures intended to optimize climate-action and ecosystem-service benefits, subject to funding and site-specific selection (Bord na Móna, 2022).

The methodology paper also records that enhanced rehabilitation measures are not simply the same as standard rehabilitation. Enhanced measures may include more intensive hydrological intervention, water-level management, drain blocking, bunding, reprofiling, cell creation, vegetation management and other measures designed to improve climate, hydrological, biodiversity and ecosystem-service outcomes where suitable (Bord na Móna, 2022).

The wider scheme of monitoring evidence confirms that rehabilitation outcomes are not assessed solely by whether works have physically occurred. The Annual Monitoring and Verification Report for EDRRS/PCAS explains that monitoring evaluates the ongoing trajectory of bogs in terms of hydrology, carbon emissions, biodiversity benefits and surface-water quality. It also records that vegetation succession may be slow and that short-term success may be better indicated by achieved water-table targets measured with piezometers than by immediate vegetation change (Bord na Móna and RPS, 2024).

That monitoring evidence is important because it shows that the relevant question is not simply whether Lanespark has undergone Phase 1 works. The relevant question is whether the Phase 1 condition represents the appropriate future environmental baseline, or whether further enhanced rehabilitation potential was assessed and excluded because of the proposed wind-farm footprint.

The available documents therefore establish four key evidential points:

4. Lanespark received Phase 1 standard rehabilitation.
5. Phase 1 standard rehabilitation is not the same thing as Phase 2 enhanced rehabilitation.
6. Lanespark was mapped as a constraint because of the proposed Littleton Wind Farm footprint.
7. Only Ballybeg and Derryvella were considered for Phase 2 enhanced rehabilitation in the 2025 rehabilitation plan.

The evidence does not establish that Lanespark definitely would have received Phase 2 enhanced rehabilitation if the wind farm had not been proposed. Nor does it establish that enhanced rehabilitation at Lanespark would necessarily have delivered the same benefits as enhanced rehabilitation at Ballybeg or Derryvella. The evidence does, however, establish that the applicant should explain whether any Lanespark enhanced rehabilitation scenario was assessed, why it was excluded, and whether the proposed wind-farm layout would limit or displace a reasonably available rehabilitation trajectory.

3.3 Analysis

The evidence shows that the applicant's baseline cannot be treated as a simple or neutral snapshot of a completed rehabilitation landscape. Lanespark has undergone Phase 1 standard rehabilitation, but the documents also show that Phase 1 standard rehabilitation and Phase 2 enhanced rehabilitation are different pathways with different purposes, measures and expected outcomes.

Phase 1 works at Lanespark are important and should be acknowledged. They included drain blocking, hydrological management and environmental stabilization under EPA IPC Licence Ref. P0499-01. However, the existence of those works does not, by itself, demonstrate that Lanespark had reached its best reasonably achievable rehabilitation condition, or that further enhanced rehabilitation had no potential environmental value.

The PCAS methodology is central to this point. It distinguishes standard rehabilitation from enhanced rehabilitation and identifies enhanced measures as a means of optimizing climate-action and ecosystem-service benefits. Those benefits may include hydrological improvement, reduced carbon emissions, biodiversity gains, water-quality benefits and the development of more naturally functioning peatland and wetland habitats where suitable (Bord na Móna, 2022).

The 2025 rehabilitation plan shows that Lanespark was not excluded from Phase 2 because it had been transparently assessed and found unsuitable for enhanced rehabilitation. Rather, the available documentation records Lanespark as a constraint because it lies within the proposed Littleton Wind Farm footprint, with only Ballybeg and Derryvella considered for Phase 2 enhanced measures (Bord na Móna, 2025).

That distinction matters. If Lanespark was excluded from Phase 2 because of a land-use decision associated with the proposed wind farm, then the EIAR should not simply rely on the Phase 1 condition as though it were an environmentally inevitable endpoint. The proper question is not whether Lanespark was rehabilitated at all. It was. The proper question is whether the EIAR has adequately explained the rehabilitation trajectory that is being relied upon, limited or displaced by the proposed wind-farm layout.

The timing of the documentation strengthens this concern. The 2025 rehabilitation plan records the proposed Littleton Wind Farm as a pre-planning project and treats its footprint as a constraint for rehabilitation planning. The formal Strategic Infrastructure Development application was not submitted until June 2026. That sequence does not prove that Lanespark would otherwise have received Phase 2 enhanced rehabilitation, but it does show that the proposed wind-farm footprint was already influencing rehabilitation planning before the application was formally before the Commission (Bord na Móna, 2025; Fehily Timoney, 2026a).

The Annual Monitoring and Verification Report for EDRRS/PCAS also shows why a simple "works completed" approach is insufficient. Rehabilitation outcomes are assessed through ongoing trajectories in hydrology, carbon emissions, biodiversity and surface-water quality. Vegetation change may be slow, and short-term rehabilitation success may be better indicated by water-table targets than by immediate vegetation response (Bord na Móna and RPS, 2024). That means the Commission should be cautious about treating Phase 1 completion as equivalent to the full future environmental potential of Lanespark.

This is not an argument that PCAS Phase 2 must be delivered at Lanespark, or that Lanespark would necessarily have achieved the same outcomes as Ballybeg or Derryvella. It is an argument about baseline integrity. Where the evidence shows that a proposed wind-farm footprint was used as a constraint in rehabilitation planning, the EIAR should explain whether enhanced rehabilitation alternatives were considered, why they were excluded, and whether the wind-farm proposal would displace, limit or rely upon a reduced rehabilitation trajectory.

In the absence of that explanation, the EIAR does not adequately demonstrate that the proposed wind farm has been assessed against the reasonable future condition of the receiving environment. The Commission is therefore being asked to evaluate the project against a Phase 1 baseline without a transparent account of whether that baseline represents the uninfluenced future condition of Lanespark, or a trajectory pre-emptively constrained by the proposed commercial footprint.

3.4 Submission Point

The submission point arising from this ground is that the EIAR does not adequately demonstrate that the Phase 1 rehabilitated condition of Lanespark represents the complete or appropriate future baseline for assessment.

The available evidence shows that Phase 1 rehabilitation was undertaken at Lanespark as standard environmental stabilization under the IPC licence framework. However, Bord na Móna's own rehabilitation methodology distinguishes standard rehabilitation from enhanced rehabilitation under PCAS, with enhanced rehabilitation directed toward additional hydrological, climate, biodiversity, water-quality and ecosystem-service benefits (Bord na Móna, 2022).

The 2025 Ballybeg/Lanespark/Derryvella rehabilitation plan records that Lanespark was mapped as a constraint because it is included within the proposed Littleton Wind Farm footprint, and that Phase 2 enhanced rehabilitation was considered only for Ballybeg and Derryvella (Bord na Móna, 2025). The EIAR therefore should not treat Lanespark's Phase 1 condition as an unavoidable environmental endpoint unless it explains whether enhanced rehabilitation options for Lanespark were assessed and reasonably excluded.

This is not a request that the Commission direct the delivery of PCAS Phase 2 works at Lanespark. It is a request that the Commission require a transparent baseline assessment. That assessment should identify the rehabilitation trajectory being assumed, explain whether enhanced rehabilitation alternatives were considered, and assess whether the proposed wind-farm layout would limit, displace or rely upon a reduced future rehabilitation pathway.

That assessment is necessary because rehabilitation success is not measured only by the physical completion of works. The EDRRS/PCAS monitoring framework assesses ongoing trajectories in hydrology, carbon emissions, biodiversity and surface-water quality, and recognises that vegetation change may be slow and that water-table response can be an important short-term indicator of rehabilitation progress (Bord na Móna and RPS, 2024).

In the absence of a transparent explanation of Lanespark's reasonable future rehabilitation trajectory, the Commission cannot be satisfied that the proposed wind farm has been assessed against the reasonable future condition of the receiving environment. The EPA Guidelines require an EIAR to address the interaction between relevant environmental factors, including land, soil, water, biodiversity, climate, landscape, population and human health (Environmental Protection Agency, 2022).

3.5 Requested Finding

I request that An Coimisiún Pleanála find that the EIAR has not adequately demonstrated that the Phase 1 rehabilitated condition of Lanespark represents the complete or appropriate future baseline for the assessment of the proposed Littleton Wind Farm.

In particular, I request that the Commission find that the applicant should provide a transparent assessment of the future rehabilitation trajectory of Lanespark, having regard to the distinction between standard rehabilitation under EPA IPC Licence Ref. P0499-01 and enhanced rehabilitation under the Peatlands Climate Action Scheme (Bord na Móna, 2022; Bord na Móna, 2025).

That assessment should explain:

1. Whether any enhanced rehabilitation scenario for Lanespark was considered;

2. Why Lanespark was mapped as a constraint because of the proposed Littleton Wind Farm footprint;

3. Whether the exclusion of Lanespark from Phase 2 enhanced rehabilitation was based on ecological, hydrological, climate, technical or land-use grounds;

4. Whether partial, integrated or mixed rehabilitation scenarios were considered for areas outside the direct wind-farm infrastructure footprint;

5. Whether the proposed wind-farm layout would limit, displace or rely upon a reduced rehabilitation trajectory at Lanespark;

6. Whether the Phase 1 rehabilitated condition is being treated as the existing baseline only, or also as the reasonable future baseline for assessment.

Pending that explanation, I request that the Commission should not accept the Phase 1 condition of Lanespark as an environmentally inevitable endpoint. The available evidence shows that Lanespark has received standard Phase 1 rehabilitation, but it does not demonstrate that enhanced rehabilitation potential at Lanespark was transparently assessed and reasonably excluded.

This requested finding does not require the Commission to direct the delivery of PCAS Phase 2 works. It requires the applicant to demonstrate that the EIAR has assessed the proposed development against a properly explained future baseline. The EPA Guidelines require an EIAR to address the interaction between relevant environmental factors, including land, soil, water, biodiversity, climate, landscape, population and human health (Environmental Protection Agency, 2022).

4. Ground 2: Ecological Risk, Curlew and the Precautionary Principle

4.1 Issue

The second ground of this submission concerns ecological risk, with particular focus on Curlew and the adequacy of the EIAR's assessment of habitat loss, disturbance, displacement, collision risk and future recovery potential.

The issue is not limited to whether Curlew are likely to collide with turbines. Collision risk is one relevant pathway, but it is not the only pathway. For a breeding Curlew territory in a recovering peatland landscape, the assessment should also address direct habitat loss, functional habitat loss, disturbance, displacement, barrier effects, amenity-related disturbance, breeding productivity and future recovery potential.

The EIAR records that Curlew occupied the Derryhogan Lakes wetland mosaic during the 2021, 2022, 2023 and 2024 breeding seasons. It also records that the territory is outside the 500 m turbine buffer, but inside the 500 m noise and visual disturbance buffer, and that the area used by Curlew is approximately 70 m from the proposed amenity track (Fehily Timoney, 2026c).

The applicant's collision-risk material identifies Curlew as a receptor because of poor conservation status, low breeding success and limited breeding distribution in the region, with only one breeding territory known in the locality or wider region. Although predicted collision effects are assessed as low locally and negligible nationally, the same material acknowledges that the loss of one breeding adult could result in loss of the local breeding population (Fehily Timoney, 2026d).

That creates a clear precautionary issue. Where the local receptor is a single known breeding territory, the Commission should not assess risk by modelled collision probability alone. It should consider the relationship between probability and consequence, and should require the applicant to demonstrate that the proposed development would not materially undermine the occupancy, breeding productivity, habitat use or future recovery potential of the local Curlew population.

This issue is particularly important because Curlew are in severe national decline. The Curlew Task Force records that the national breeding population has declined by approximately 96%, and that bogs remain a vitally important part of the ecological and conservation requirements of Curlew in Ireland (Curlew Task Force, 2019).

The planning question is therefore not simply whether the existing breeding pair is outside the 500 m turbine buffer. The planning question is whether the proposed wind farm, associated infrastructure, construction activity and amenity access would reduce the functional habitat space, breeding security or future recovery potential of the only known local breeding Curlew territory.

4.2 Evidence

The EIAR identifies Curlew as a key ornithological receptor at the proposed Littleton Wind Farm site. Chapter 7 records that Curlew were identified during vantage point surveys, breeding bird surveys and breeding wader/waterbird surveys. Curlew were observed during the winter months of 2020–2021, 2021–2022 and 2024–2025, and during the summer months of 2021, 2022, 2023 and 2024 (Fehily Timoney, 2026c).

The EIAR records a breeding Curlew pair occupying the Derryhogan Lakes wetland mosaic in each of the 2021, 2022, 2023 and 2024 breeding seasons. The pair was assessed as likely to have bred successfully in 2021 and 2022. In 2023 and 2024, breeding success could not be determined. The EIAR also records the arrival of post-breeding Curlew from other parts of the country in July, making determination of breeding success for the local pair more difficult (Fehily Timoney, 2026c).

The Derryhogan Lakes Curlew territory is recorded as being outside the 500 m turbine buffer. However, it is also recorded as being inside the 500 m noise and visual disturbance buffer. The EIAR states that Curlew are sensitive to visual disturbance within 300 m, and that the proposed amenity track bordering Derryhogan Lakes is approximately 70 m from areas where Curlew activity was recorded (Fehily Timoney, 2026c).

The EIAR states that noise disturbance from construction activity has potential to cause some displacement and/or disturbance to breeding Curlew at Derryhogan Lakes. It also states that, because Derryhogan Lakes is inhabited by a breeding Curlew pair and has high levels of Curlew activity, expected effects to the local breeding Curlew population arise before mitigation (Fehily Timoney, 2026c).

The applicant's Collision Risk Modelling Report identifies Curlew for assessment because of poor conservation status, low breeding success and limited breeding distribution in the region. It states that only one breeding territory is known in the locality or wider region. The report assesses predicted collision effects for Curlew as low locally and negligible nationally, but also states that there is potential for effects to be of higher magnitude because of the species' poor conservation status and limited recruitment to the breeding adult cohort (Fehily Timoney, 2026d).

The same Collision Risk Modelling Report states that, because only a single Curlew pair is present at Littleton and within the wider region, the potential loss of one breeding adult through collision could result in loss of the local breeding population. It also records that the highest concentration of Curlew flight activity within the 500 m turbine buffer occurred in the area of T01–T03, while the highest concentration of flight activity outside the 500 m buffer was observed around Derryhogan Lakes, the territory occupied by the local breeding pair (Fehily Timoney, 2026d).

The mitigation schedule confirms that construction works within 500 m of Derryhogan Lakes are proposed to occur outside the breeding season, from 1 March to 31 August, because of potential construction-noise and visual disturbance to Curlew and other species breeding in this area. It also proposes that works in this area be limited to daylight hours, and that a permanent 2 m high berm be installed to prevent noise and visual disturbance to Curlew and other bird species breeding at Derryhogan Lakes (Fehily Timoney, 2026e).

Further mitigation is proposed for the amenity trail and access infrastructure. The Non-Technical Summary records that mammal fencing will be installed along amenity trail and access track sections where barriers are required to prevent dogs and walkers from accessing key bird habitats. It also records proposed willow screening, signage requiring recreational users to remain on trails and control dogs near bird habitats, and design measures intended to discourage users from deviating from trails in key areas (Fehily Timoney, 2026f).

The Curlew Task Force records the wider conservation context. It states that Curlew is the only Irish bird on the IUCN Red List of Threatened Species, that it is protected under the Birds Directive, Wildlife Acts and Birds and Natural Habitats Regulations, and that the Irish breeding population was estimated at 138 pairs, representing an estimated decline of 96% since the 1988–1991 Bird Atlas population estimate (Curlew Task Force, 2019).

The Curlew Task Force also records that bogs are a vitally important part of the ecological and conservation requirements of Curlew in Ireland. It states that it is believed that two-thirds of Curlew in Ireland are nesting on bogs and using nearby grasslands or other habitats to supplement the diet they obtain on the bogs (Curlew Task Force, 2019).

The evidence therefore establishes several key points:

8. The Derryhogan Lakes Curlew territory has been repeatedly occupied over four breeding seasons.

9. The territory is outside the 500 m turbine buffer but inside the 500 m noise and visual disturbance buffer.

10. Curlew activity was recorded close to a proposed amenity track.

11. The applicant's own collision-risk material recognises that loss of one breeding adult could result in loss of the local breeding population.
12. The proposed mitigation itself confirms that disturbance, access and amenity-related effects require active management.

4.3 Analysis

The evidence shows that the Curlew issue cannot safely be reduced to a narrow question of turbine collision risk. The EIAR records that the Derryhogan Lakes Curlew territory lies outside the 500 m turbine buffer, and that direct habitat loss is not expected in the areas used by Curlew for foraging, breeding or roosting. Those points are relevant and should be acknowledged. However, they do not resolve the full ecological risk, because the same EIAR also identifies construction noise, visual disturbance, amenity access and displacement as potential impact pathways for breeding Curlew at Derryhogan Lakes (Fehily Timoney, 2026c).

The central concern is functional habitat loss. Habitat may remain physically present on a map, but become less useful to Curlew if disturbance, access, noise, visual intrusion, construction activity, dog-walking, maintenance or barrier effects reduce its practical value for breeding, feeding, chick-rearing or movement. In that context, the fact that the territory is outside the 500 m turbine buffer does not, by itself, demonstrate that the local Curlew territory would remain functionally secure.

This distinction is supported by the applicant's own mitigation. The proposed seasonal restriction on works within 500 m of Derryhogan Lakes, the permanent 2 m berm, daylight-working limits, fencing, screening, signage and controls on dogs and trail users all show that disturbance and access effects require active management. These measures may reduce risk, but their presence also confirms that the applicant has identified real disturbance pathways requiring mitigation (Fehily Timoney, 2026e; Fehily Timoney, 2026f).

The collision-risk evidence also requires careful interpretation. The applicant assesses predicted Curlew collision effects as low locally and negligible nationally. However, the same assessment recognises that Curlew have poor conservation status, limited recruitment and only one known breeding territory in the locality or wider region. It further acknowledges that the loss of one breeding adult could result in loss of the local breeding population (Fehily Timoney, 2026d).

That creates an asymmetry between probability and consequence. Even where the modelled probability of collision is low, the possible local consequence is serious because the receptor is not a large, resilient local population. It is a single known breeding territory in a species that has undergone severe national decline. The Commission should therefore be cautious about accepting low modelled collision probability as sufficient to rule out material local risk.

The repeated occupation of Derryhogan Lakes from 2021 to 2024 also matters. This is not a one-off record or incidental use of the site. The EIAR records a breeding pair using the same wetland mosaic over four breeding seasons, with likely breeding success in 2021 and 2022 and undetermined success in 2023 and 2024. That pattern supports treating Derryhogan Lakes as an established local breeding territory requiring careful assessment of occupancy, breeding productivity and long-term retention (Fehily Timoney, 2026c).

The future recovery dimension is also important. Curlew Task Force material records an estimated 96% decline in the Irish breeding population and describes bogs as a vitally important part of Curlew ecology and conservation in Ireland. In that context, the assessment should not treat the currently mapped territory as a static endpoint. It should consider whether the recovering peatland landscape could support continued occupancy, recruitment, movement or future territory expansion, and whether the proposed wind farm would reduce that recovery potential (Curlew Task Force, 2019).

This links directly to Ground 1. If the future rehabilitation trajectory of Lanespark and the wider Littleton Bog Group has not been fully explained, then the future ecological value of the recovering bog landscape has also not been fully explained. The Curlew assessment should therefore consider not only the current post-Phase 1 condition, but also the reasonable future habitat function of the wider recovering peatland landscape.

The appropriate planning question is therefore broader than whether the existing breeding pair sits outside a 500 m turbine buffer. The question is whether the proposed development, including turbines, access tracks, construction activity, amenity trails, public access, mitigation structures and long-term operation, would materially reduce the survival space, functional habitat or future recovery potential of the only known local breeding Curlew territory.

On the evidence available, the EIAR has not adequately demonstrated that those risks have been resolved. It identifies important mitigation measures and models collision probability, but the residual question remains whether the proposed development would maintain the functional integrity, breeding security and recovery potential of the Derryhogan Lakes Curlew territory over the life of the wind farm.

4.4 Submission Point

The submission point arising from this ground is that the EIAR does not adequately demonstrate that ecological risk to Curlew has been resolved by the fact that the Derryhogan Lakes territory lies outside the 500 m turbine buffer, or by the conclusion that modelled collision risk is low locally and negligible nationally.

Those factors are relevant, but they do not answer the full ecological question. The applicant's own material identifies several additional pathways of concern, including construction noise, visual disturbance, displacement, amenity access, dog and walker disturbance, and the need for seasonal restrictions, screening, fencing, signage and post-construction monitoring (Fehily Timoney, 2026c; Fehily Timoney, 2026e; Fehily Timoney, 2026f).

The Commission should therefore assess Curlew risk as a question of functional habitat space, not collision risk alone. A habitat area may remain physically present, but its value to Curlew may be reduced if the proposed development affects breeding security, feeding, chick-rearing, movement, occupancy or future recovery potential.

This is particularly important because the applicant's Collision Risk Modelling Report recognises that Curlew have poor conservation status, low breeding success and limited breeding distribution in the region. It also states that only one breeding territory is known in the locality or wider region, and that loss of one breeding adult could result in loss of the local breeding population (Fehily Timoney, 2026d).

The EIAR should therefore be required to demonstrate that the proposed development would not materially undermine the functional integrity of the Derryhogan Lakes Curlew territory. That assessment should include direct habitat loss, functional habitat loss, disturbance, displacement, amenity effects, collision risk, breeding productivity and future recovery potential.

The proposed mitigation measures may reduce risk, but the presence of those measures also confirms that disturbance and access effects require active management. The Commission should not assume that the

measures will be sufficient unless the applicant clearly demonstrates how they will be secured by condition, enforced, monitored and adapted over the lifetime of the wind farm.

This is not an argument that all wind-farm development is incompatible with Curlew. It is an argument that, where a proposal affects the only known local breeding territory of a species that has undergone severe national decline, the EIAR must do more than rely on a low modelled collision probability. It must demonstrate that the proposal would not materially reduce the survival space or future recovery potential of that local breeding territory (Curlew Task Force, 2019; Fehily Timoney, 2026d).

4.5 Requested Finding

I request that An Coimisiún Pleanála find that the EIAR has not adequately demonstrated that ecological risk to Curlew has been resolved by the location of the Derryhogan Lakes territory outside the 500 m turbine buffer or by the assessment of low modelled collision risk (Fehily Timoney, 2026c; Fehily Timoney, 2026d).

In particular, I request that the Commission find that the applicant should provide a clearer assessment of the functional habitat requirements, breeding security and future recovery potential of the Derryhogan Lakes Curlew territory, having regard to the fact that it is the only known local or wider regional breeding territory identified in the applicant's own collision-risk material (Fehily Timoney, 2026d).

That assessment should explain:

1. whether the proposed development would reduce the functional habitat space available to Curlew at Derryhogan Lakes;

2. whether construction noise, visual disturbance, access tracks, amenity use, dogs, walkers, fencing, screening, berms and operational maintenance would affect occupancy, breeding productivity, foraging, chick-rearing, movement or future recovery potential (Fehily Timoney, 2026c; Fehily Timoney, 2026e; Fehily Timoney, 2026f);

3. whether the proposed mitigation measures are sufficient to protect the Derryhogan Lakes Curlew territory over the full lifetime of the wind farm;

4. how seasonal restrictions, the permanent berm, fencing, screening, signage, dog-control measures and post-construction monitoring would be secured, enforced, monitored and adapted if Curlew behaviour or breeding success declines (Fehily Timoney, 2026e; Fehily Timoney, 2026f);

5. whether the assessment has considered the relationship between low modelled collision probability and severe possible local consequence, given that the loss of one breeding adult could result in loss of the local breeding population;

6. whether the future recovery potential of Curlew in the wider recovering peatland landscape has been adequately assessed, including the interaction between peatland rehabilitation, habitat function and long-term breeding viability.

Pending that explanation, I request that the Commission should not accept that Curlew risk has been adequately resolved by the conclusion that collision risk is low locally and negligible nationally. The evidence shows that the proposal also raises issues of functional habitat loss, disturbance, displacement, amenity effects, mitigation certainty and future recovery potential.

This requested finding does not require the Commission to find that the proposed wind farm would necessarily eliminate the Derryhogan Lakes Curlew territory. It requires the applicant to demonstrate that the EIAR has assessed the full range of relevant ecological impact pathways and has shown, with sufficient certainty, that the proposed development would not materially undermine the functional integrity, breeding security or recovery

potential of the only known local breeding Curlew territory, particularly having regard to the severe national decline and conservation status of Curlew in Ireland (Curlew Task Force, 2019).

5. Ground 3: Future of the Community, Landscape and Adjoining Lands

5.1 Issue

The third ground of this submission concerns the long-term community, residential amenity, landscape and land-use implications of the proposed Littleton Wind Farm.

The issue is not limited to whether individual houses comply with minimum separation distances, or whether individual viewpoints show significant visual effects. Those matters are relevant, but they do not address the full planning question. The proposed development would introduce 11 turbines, turbine foundations, crane hardstands, access tracks, drainage infrastructure, an onsite substation, peat and spoil management areas, vegetation clearance, amenity works and associated infrastructure into a former industrial peatland landscape that is now in a post-extraction phase (Fehily Timoney, 2026a).

The wider issue is whether the proposed wind farm represents an appropriate long-term land-use decision for a recovering post-peat landscape and its adjoining rural community. The receiving environment is not simply an abandoned industrial site. It includes former Bord na Móna peatlands, rehabilitation lands, local roads, adjoining private lands, rural houses, family farms, community amenity areas, ecological recovery areas, cultural landscape associations and potential future land-use choices.

This is particularly important because the proposed turbine layout would be located in close proximity to adjoining family lands and a rural family house at Derryvella. The verified distance and bearing schedule set out in Appendix D records four proposed turbines within approximately 2 km of the Rafter family house, seven within approximately 3 km, nine within approximately 4 km, and all 11 within approximately 5 km. The nearest turbines are T10 at approximately 1,592 m, T9 at approximately 1,659 m, T11 at approximately 1,780 m and T8 at approximately 1,995 m. That proximity is directly relevant to residential amenity, adjoining lands, local settlement, landscape character and the lived experience of the proposed development.

The issue for the Commission is whether the EIAR has adequately assessed the combined effect of the proposed development on community amenity, residential amenity, landscape character, adjoining lands and future land-use potential. That includes the interaction between turbines, access infrastructure, visual change, amenity routes, ecological rehabilitation, local settlement, adjoining family lands, private residential outlook and the long-term identity of the area as it moves beyond industrial peat extraction.

This submission does not argue that the landscape must remain unchanged, or that renewable energy should be excluded from all former peatland areas. The point is narrower. Where a proposal would introduce another major industrial land use into a landscape already transitioning away from peat extraction, and where the proposed turbine layout would form a concentrated local turbine presence around adjoining family lands and a rural house, the EIAR should clearly demonstrate that the wider post-peat community, residential, landscape and land-use consequences have been properly assessed.

The EPA Guidelines require an EIAR to assess effects on population and human health, land, soil, water, biodiversity, climate, cultural heritage, landscape and the interactions between these factors. In this case, those interactions are central to the planning assessment because the proposal affects not only the existing condition of the site, but also the future direction of a recovering rural and peatland landscape (Environmental Protection Agency, 2022).

5.2 Evidence

The proposed Littleton Wind Farm is not limited to turbine structures. The application includes 11 turbines, turbine foundations and hardstands, internal access tracks, drainage infrastructure, an onsite 110 kV substation, grid connection works, peat and spoil management areas, vegetation clearance, temporary construction compounds, borrow pit works, amenity infrastructure and biodiversity enhancement measures (Fehily Timoney, 2026a).

The EIAR Chapter 5 assessment of population and human health considers effects on population, employment and economic activity, land use, recreation/amenity/tourism, and human health and safety across construction, operation and decommissioning. It also relies on other EIAR chapters for pathways including noise, shadow flicker, air quality, traffic, hydrology, slope stability, flood risk, landscape and visual effects, and material assets (Fehily Timoney, 2026b).

Chapter 5 identifies the receiving environment as rural, with nearby villages and settlements around the site. It uses census data for the population baseline and Eircode/Geodirectory data for residential receptors. It identifies the closest residential receptor as approximately 851 m south-west of turbine T11 (Fehily Timoney, 2026b).

In addition to the applicant's general residential receptor assessment, the Rafter family house at Derryvella is located within close proximity of the proposed turbine layout. The verified distance and bearing schedule prepared from ITM coordinates records that the nearest proposed turbine is T10 at approximately 1,592 m, with T9 at approximately 1,659 m, T11 at approximately 1,780 m and T8 at approximately 1,995 m. Those four turbines are therefore within approximately 2 km of the family house. The same schedule records seven proposed turbines within approximately 3 km, nine proposed turbines within approximately 4 km, and all 11 proposed turbines within approximately 5 km. The verified ITM grid bearings also show that T10, T9 and T11 lie generally to the south-west, west-south-west and south-south-west of the family house respectively, while the remaining turbines lie generally to the north and north-north-east. This proximity evidence is relevant to residential amenity, adjoining lands, local settlement, cumulative visibility, landscape character and the combined lived effect of the proposed development. The full schedule is set out in Appendix D.

The wider wind-farm context is also relevant. The spatial material set out in Appendix D identifies the proposed Littleton Wind Farm as the subject development, with 11 turbines and a stated maximum tip height of 200 m. It also identifies a wider surrounding wind-energy context, including operational, consented or proposed wind farms such as Ballincurry, Gurteen, Knocknamuck/Cnoc, Farranrory, Kill Hills, Ballybay, Lisheen I, Lisheen II, Lisheen III, Brittas, Foyle/Foyleature, Kyleballyoughter, Knockroe, Brisklagh, Bruckana, Borrisbeg and Lisdowney. This does not replace the site-specific assessment of Littleton Wind Farm, but it confirms that the proposed development would be experienced within a wider cumulative wind-energy landscape.

The applicant identifies positive socio-economic effects, including employment, commercial rates, development contributions, a Community Benefit Fund, a Near Neighbour Scheme and renewable-electricity benefits. Chapter 5 estimates that the proposed Community Benefit Fund could be approximately €5.5 million over the first 15 years of the fund, based on proposed annual electricity generation (Fehily Timoney, 2026b).

The rehabilitation documentation records that the Ballybeg/Lanespark/Derryvella bog complex is not an empty or unused landscape. It identifies Lough Doire Bhile as an amenity area developed on former cutaway bog between 1999 and 2001, now leased to the Slieve Ardagh Rural Development community group. It also records the Lough Doire Bhile loop as a 2.4 km walking trail, and maps Lough Doire Bhile Wildlife Reserve and amenity area as constraints in the rehabilitation plan (Bord na Móna, 2025).

The same rehabilitation documentation records that the Littleton Labyrinth was developed in partnership with Tipperary County Council. It describes an amenity walking/cycling track along the headland and former rail-line corridors on the northwestern margins of Derryvella Bog, linking to the Lough Doire Bhile amenity area as part of the Littleton Labyrinth Greenway in 2024. It also records planned additional amenity trails associated with

the Midlands Network Trail, including shared cycle and walking routes, signage and fencing (Bord na Móna, 2025).

The landscape and visual material includes a specific viewpoint from the Lough Doire Bhile Loop. The VP27 photomontage material identifies the Lough Doire Bhile Loop viewpoint and records turbine T10 as the nearest visible turbine at approximately 0.7 km from that viewpoint (Fehily Timoney, 2026g).

The EIAR and supporting technical material also confirm that the proposal would involve significant physical intervention in peat and spoil. The Peat and Spoil Management Plan records that excavated peat and spoil would be transported to designated deposition areas as access tracks and hardstands are developed. It also identifies peat and spoil volumes associated with turbines, hardstands and internal access tracks (Fehily Timoney, 2026h).

Chapter 9 records that proposed infrastructure is distributed across multiple bog areas and waterbody catchments. For Ballybeg/Lanespark/Derryvella Bog, the listed infrastructure includes internal site access tracks, amenity tracks, peat deposition areas and turbines T9, T10 and T11 within the North Glengoole_010 and Breagagh_010 waterbody contexts (Fehily Timoney, 2026i).

The evidence therefore establishes several key points:

1. The proposal is a large, long-term infrastructure project, not simply a set of turbines.

2. The receiving environment is a rural post-peat landscape with existing and planned amenity uses rural houses, family farms, adjoining lands and local settlement.

3. The Rafter family house at Derryvella is within approximately 2 km of four proposed turbines, within approximately 3 km of seven proposed turbines, within approximately 4 km of nine proposed turbines, and within approximately 5 km of all 11 proposed turbines.

4. The proposed turbine layout is not a distant or abstract feature in relation to the Rafter family house and adjoining lands. It would create a concentrated local turbine presence in the wider setting of that residence and landholding, with turbines lying generally to the south-west and to the north/north-north-east.

5. Lough Doire Bhile and the Littleton Labyrinth are already recognised amenity features within the rehabilitation landscape.

6. The proposal would place turbines and associated infrastructure close to existing amenity and rehabilitation areas, adjoining lands and local residential receptors.

7. The surrounding area is already influenced by existing, consented or proposed wind-energy development, making cumulative landscape and community context relevant.

8. The applicant identifies community and socio-economic benefits, but the wider issue is whether those benefits have been weighed against the long-term community, residential, landscape and future land-use consequences of another major industrial land use in a recovering post-peat landscape.

5.3 Analysis

The evidence shows that the proposed development should not be assessed only as a set of turbines viewed from individual receptors. The proposal includes a wider package of permanent and temporary infrastructure, including turbines, hardstands, access tracks, drainage infrastructure, an onsite substation, peat and spoil management areas, construction compounds, amenity infrastructure and grid-related works. Those elements would be introduced into a recovering post-peat landscape with existing rehabilitation, amenity, ecological, residential and community functions (Bord na Móna, 2025; Fehily Timoney, 2026a).

This matters because the receiving environment is not simply derelict or unused industrial land. The rehabilitation documentation identifies Lough Doire Bhile, the Lough Doire Bhile loop, the Littleton Labyrinth Greenway and planned additional amenity trails as existing or planned features within the same post-peat landscape. These are not incidental features. They show that the Littleton Bog Group is already being re-used and re-imagined for public amenity, biodiversity, rehabilitation, access and local community purposes (Bord na Móna, 2025).

The family-house distance and bearing schedule materially strengthens this point. It shows that the proposed development would not be a distant background feature in relation to the Rafter family house and adjoining lands at Derryvella. Four proposed turbines would be within approximately 2 km of the family house, seven within approximately 3 km, nine within approximately 4 km, and all 11 within approximately 5 km. The nearest proposed turbines are T10 at approximately 1,592 m, T9 at approximately 1,659 m, T11 at approximately 1,780 m and T8 at approximately 1,995 m. This is relevant in its own right to residential amenity, adjoining lands, private outlook, landscape character and the lived experience of the proposed turbine layout. It is also relevant to the wider community and landscape assessment because the same local landscape is already being assessed as a post-peat rehabilitation and amenity landscape.

The directional pattern also matters. The verified schedule indicates that the three nearest turbines, T10, T9 and T11, lie generally to the south-west of the family house, while the remaining turbines lie generally to the north and north-north-east. That means the proposed layout would not be experienced as a single distant group in one peripheral direction. It would form a substantial local turbine presence in the wider setting of the family house and adjoining lands. That does not, by itself, determine the planning outcome, but it is important factual context for the assessment of residential amenity, cumulative visibility, landscape character and local settlement.

The applicant identifies community benefits, including employment, commercial rates, development contributions, a Community Benefit Fund and a Near Neighbour Scheme. Those benefits are relevant and should be acknowledged. However, they do not remove the need to assess the long-term residential, community and landscape cost of placing major wind-energy infrastructure into a recovering peatland landscape. Community benefit payments are not a substitute for a full assessment of residential amenity, landscape character, amenity experience, adjoining land-use potential and the future direction of the local area (Fehily Timoney, 2026b).

The landscape and amenity issue is particularly clear at Lough Doire Bhile. The VP27 material identifies a Lough Doire Bhile Loop viewpoint and records turbine T10 as the nearest visible turbine at approximately 0.7 km. That does not automatically make the development unacceptable, but it does show that the wind farm would be experienced directly from an established community amenity and rehabilitation landscape, not only from distant or abstract viewpoints (Fehily Timoney, 2026g).

The wider wind-farm context reinforces the need for an integrated assessment. The surrounding area already contains a number of operational, consented or proposed wind energy developments. The proposed Littleton Wind Farm should therefore not be assessed only as an isolated layout. It should also be assessed as part of the cumulative landscape and community setting in which local residents, adjoining landowners and amenity users would experience the development.

The physical works also matter. The Peat and Spoil Management Plan confirms that excavated peat and spoil would be transported to designated deposition areas as access tracks and hardstands are developed. Chapter 9 also records proposed infrastructure across multiple bog areas and waterbody contexts, including internal access tracks, amenity tracks, peat deposition areas and turbines T9, T10 and T11 within the Ballybeg/Lanespark/Derryvella context. This reinforces that the proposal is a substantial land-use intervention within the bog landscape, not a minor overlay on an otherwise unchanged site (Fehily Timoney, 2026h; Fehily Timoney, 2026i).

The planning issue is therefore one of long-term compatibility. Former peatland landscapes can have more than one possible future. Renewable energy may be one possible after-use, but so are rehabilitation, biodiversity recovery, water management, walking and cycling routes, community amenity, heritage interpretation, low-impact rural uses, private residential amenity and adjoining land-use choices. The EIAR should therefore demonstrate how the proposed wind farm has been assessed against these wider post-peat futures, rather than treating renewable energy infrastructure as the inevitable or dominant next use of the landscape.

This also connects to Grounds 1 and 2. If the future rehabilitation trajectory of Lanespark has not been fully explained, then the future community and landscape value of the recovering bog has also not been fully explained. If the same landscape supports the only known local breeding Curlew territory, then ecological recovery and community amenity cannot be separated from the land-use decision. The Commission should therefore assess the proposal as an integrated planning question involving peatland rehabilitation, biodiversity, community amenity, residential amenity, landscape character and future land-use potential.

The EIAR Chapter 5 approach relies on other technical chapters for many of the pathways through which people experience environmental effects, including noise, shadow flicker, air quality, traffic, hydrology, slope stability, flood risk, landscape and visual effects, and material assets. That structure is not wrong, but it means the Commission should be careful to ensure that the combined lived effect has not been lost between separate topic chapters (Fehily Timoney, 2026b).

In my submission, the EIAR does not adequately demonstrate that the wider community, residential, landscape and future land-use consequences have been assessed as a single post-peat transition issue. It identifies individual receptors, viewpoints, technical effects and community benefits, but the remaining planning question is whether the proposal would lock a recovering peatland and rural community landscape into another long-term industrial land use before its rehabilitation, amenity, ecological, residential and adjoining land-use potential has been fully evaluated.

5.4 Submission Point

The submission point arising from this ground is that the EIAR does not adequately assess the proposed Littleton Wind Farm as a long-term land-use decision for a recovering post-peat community, residential and landscape setting.

The applicant assesses population, human health, landscape, amenity, traffic, hydrology, soils and other technical matters through separate EIAR chapters. That structure is understandable, but it risks treating community, residential and landscape effects as a set of separate technical thresholds rather than as a combined post-peat transition issue. The Commission should be satisfied that the combined effect of the proposal on community amenity, residential amenity, landscape character, adjoining lands and future land-use potential has not been lost between separate topic chapters (Fehily Timoney, 2026b; Environmental Protection Agency, 2022).

The proposed development would not be experienced only as individual turbines seen from individual viewpoints. It would introduce turbines, hardstands, access tracks, drainage infrastructure, peat and spoil deposition areas, construction compounds, amenity infrastructure and an onsite substation into a landscape that

already contains rehabilitation areas, community amenity routes, Lough Doire Bhile, the Littleton Labyrinth, planned future amenity connections, adjoining family lands and rural residential receptors (Bord na Móna, 2025; Fehily Timoney, 2026a).

The proximity of the proposed turbine layout to the Rafter family house is directly relevant to this assessment. The verified distance and bearing schedule records four proposed turbines within approximately 2 km of the family house, seven within approximately 3 km, nine within approximately 4 km, and all 11 within approximately 5 km. That evidence should not be dismissed as merely a private preference about a view. It is relevant to residential amenity, private outlook, adjoining lands, landscape character, cumulative visibility and the lived experience of the proposed development.

The applicant identifies positive community and socio-economic effects, including employment, commercial rates, a Community Benefit Fund and a Near Neighbour Scheme. Those matters are relevant, but they do not remove the need to assess whether the proposal is compatible with the longer-term community, residential, landscape and land-use future of the Littleton Bog Group. Financial or community-benefit measures should not be treated as a substitute for a full assessment of residential amenity, landscape character, amenity experience, adjoining land-use potential and the future direction of the local area (Fehily Timoney, 2026b).

The proximity of the proposed development to Lough Doire Bhile is also important. The landscape and visual material identifies the Lough Doire Bhile Loop as a viewpoint and records turbine T10 as the nearest visible turbine at approximately 0.7 km. That does not automatically determine the planning outcome, but it shows that the proposed development would be experienced from within an established rehabilitation and community amenity landscape, not only from distant receptors or abstract viewpoints (Fehily Timoney, 2026g).

The EIAR should therefore be required to demonstrate that the proposal has been assessed against the wider post-peat future of the area. That assessment should address the interaction between renewable energy infrastructure, peatland rehabilitation, residential amenity, community amenity, biodiversity recovery, landscape character, cumulative visibility, adjoining land-use potential and local settlement.

This is not an argument that former peatlands can never accommodate renewable energy infrastructure. It is an argument that, where a former industrial peatland is already moving toward rehabilitation, biodiversity recovery and community amenity use, and where the proposed layout would place a concentrated turbine presence around an adjoining family house and landholding, a further long-term industrial use should be assessed against that wider transition rather than treated as the inevitable next land-use endpoint.

The Commission should therefore not treat compliance with individual technical thresholds, minimum separation distances, or the existence of community-benefit measures as sufficient in itself. The applicant should demonstrate that the proposed development represents proper planning and sustainable development when assessed against the combined residential, community, landscape and future land-use consequences for the Littleton Bog Group.

5.5 Requested Finding

I request that An Coimisiún Pleanála find that the EIAR has not adequately demonstrated that the proposed Littleton Wind Farm has been assessed as a long-term land-use decision for a recovering post-peat community, residential and landscape setting.

In particular, I request that the Commission find that the applicant should provide a clearer integrated assessment of the combined residential, community, landscape, amenity and future land-use effects of the proposal, rather than relying only on separate topic assessments, individual technical thresholds, minimum separation distances or community benefit measures (Environmental Protection Agency, 2022; Fehily Timoney, 2026b).

That assessment should explain:

1. how the combined effect of turbines, hardstands, access tracks, drainage infrastructure, peat and spoil deposition areas, amenity infrastructure, construction compounds and the onsite substation would affect the future character and function of the Littleton Bog Group;

2. how the proposed turbine layout would affect residential amenity, private outlook, adjoining family lands, local settlement and the lived experience of the Rafter family house at Derryvella, having regard to the verified distance and bearing schedule showing four turbines within approximately 2 km, seven within approximately 3 km, nine within approximately 4 km, and all 11 turbines within approximately 5 km;

3. how the proposed development would affect the experience, setting and future role of Lough Doire Bhile, the Lough Doire Bhile Loop, the Littleton Labyrinth Greenway and planned future amenity routes (Bord na Móna, 2025; Fehily Timoney, 2026g);

4. whether community-benefit measures, including the Community Benefit Fund and Near Neighbour Scheme, have been clearly distinguished from environmental assessment and have not been treated as a substitute for assessing residential, landscape, amenity or land-use effects (Fehily Timoney, 2026b);

5. whether the proposed development would constrain future post-peat land-use options, including rehabilitation, biodiversity recovery, amenity, heritage interpretation, low-impact rural use, adjoining land-use potential and local community initiatives;

6. whether the combined lived effect on nearby rural communities, adjoining lands and local residential receptors has been adequately assessed across the separate EIAR chapters dealing with population and human health, landscape and visual effects, hydrology, soils, traffic, noise, shadow flicker and material assets;

7. whether the cumulative landscape and community setting has been adequately assessed having regard to the proposed Littleton Wind Farm and the surrounding pattern of operational, consented and proposed wind-energy development;

8. whether the proposal is compatible with the future rehabilitation trajectory of Lanespark and the wider Littleton Bog Group, including the issues raised in Grounds 1 and 2 of this submission.

Pending that explanation, I request that the Commission should not treat compliance with individual technical thresholds, minimum separation distances, or the existence of financial or community-benefit measures as sufficient to demonstrate proper planning and sustainable development.

This requested finding does not require the Commission to find that former peatlands can never accommodate renewable energy infrastructure. It requires the applicant to demonstrate that, in this specific location, the proposed development has been assessed against the wider post-peat transition of the area, including rehabilitation, biodiversity, residential amenity, community amenity, landscape character, adjoining land-use potential and the long-term future of the local community.

6. Overall Conclusion

This submission does not object to renewable energy in principle. It accepts that renewable energy is an important part of climate action and that former industrial peatlands may, in some circumstances, be considered for renewable energy development. The issue is whether this particular proposal has been adequately assessed in this particular recovering post-peat landscape.

The proposed Littleton Wind Farm is not being brought forward in an ordinary greenfield landscape, nor in a landscape with no alternative post-industrial future. It is proposed within and around the Littleton Bog Group, where peat extraction has ceased, rehabilitation has already occurred, further rehabilitation and amenity uses are being planned, ecological recovery is underway, and community and landscape functions are changing (Bord na Móna, 2025).

The central concern running through this submission is baseline integrity. The Commission should not treat the current Phase 1 rehabilitated condition of Lanespark as the complete future baseline unless the applicant demonstrates that enhanced rehabilitation alternatives, including partial, integrated or mixed rehabilitation options, were transparently assessed and reasonably excluded (Bord na Móna, 2022; Bord na Móna, 2025).

The second concern is ecological risk. The Curlew issue should not be reduced to a question of turbine collision risk alone. The applicant's own material identifies a single known local or wider regional breeding territory at Derryhogan Lakes. In that context, the Commission should require a clear assessment of functional habitat loss, disturbance, displacement, amenity effects, breeding security and future recovery potential, as well as collision risk (Curlew Task Force, 2019; Fehily Timoney, 2026c; Fehily Timoney, 2026d).

The third concern is the long-term community, residential, landscape and land-use future of the area. The proposed development would introduce another major industrial land use into a landscape already moving from peat extraction toward rehabilitation, biodiversity recovery, amenity access and possible future community uses. It would also place a concentrated turbine presence in close proximity to adjoining family lands and the Rafter family house at Derryvella, with four proposed turbines within approximately 2 km, seven within approximately 3 km, nine within approximately 4 km, and all 11 proposed turbines within approximately 5 km, as set out in Appendix D.

That proximity evidence should not be treated as a standalone private-view objection. It is relevant to residential amenity, adjoining lands, private outlook, landscape character, cumulative visibility, local settlement and the lived experience of the proposed development. Community benefit payments, minimum separation distances and compliance with individual technical thresholds should not be treated as a substitute for an integrated assessment of those wider consequences (Environmental Protection Agency, 2022).

These three concerns are linked. If the future rehabilitation trajectory of Lanespark has not been fully explained, then the ecological, community, residential, landscape and land-use consequences of the proposal have also not been fully explained. If the same wider landscape supports a sensitive Curlew receptor, then biodiversity recovery and community amenity cannot be separated from the planning decision. If the area is already being re-used for rehabilitation, walking routes, biodiversity and community purposes, then the proposed wind farm must be assessed against that broader post-peat transition.

I therefore request that An Coimisiún Pleanála require the applicant to demonstrate that the EIAR has assessed the proposed development against the reasonable future condition of the receiving environment, not merely against a static snapshot of the current post-Phase 1 condition.

Pending that demonstration, the Commission should not conclude that the proposed development has been adequately assessed for the purposes of proper planning and sustainable development. The key issue is not whether renewable energy is desirable in general. The key issue is whether this specific wind farm proposal is compatible with the rehabilitation, ecological, residential, community, landscape and future land-use potential of the Littleton Bog Group.

7. Request to An Coimisiún Pleanála

For the reasons set out in this submission, I request that An Coimisiún Pleanála should not grant permission for the proposed Littleton Wind Farm on the basis of the EIAR and supporting material currently before it, unless the applicant first provides further information sufficient to resolve the baseline, ecological, residential, community, landscape and land-use issues identified in this submission.

In particular, I request that the Commission require the applicant to address the following matters before any decision is made:

1. the future rehabilitation trajectory of Lanespark, including whether any enhanced, partial, integrated or mixed rehabilitation scenario was assessed and reasonably excluded;

2. the reason why Lanespark was mapped as a constraint in the 2025 Ballybeg/Lanespark/Derryvella rehabilitation documentation because of the proposed Littleton Wind Farm footprint;

3. whether the Phase 1 rehabilitated condition of Lanespark is being treated as the existing baseline only, or also as the reasonable future baseline for the purposes of environmental assessment;

4. the full range of ecological impact pathways affecting Curlew at Derryhogan Lakes, including functional habitat loss, disturbance, displacement, amenity effects, collision risk, breeding productivity, mitigation certainty and future recovery potential;

5. the relationship between low modelled collision probability and severe possible local consequence for Curlew, given the applicant's own identification of only one known local or wider regional breeding territory;

6. how the proposed Curlew mitigation measures would be secured, enforced, monitored and adapted over the full lifetime of the wind farm;

7. the combined residential, community, landscape, amenity and future land-use effects of the proposal, rather than assessing those effects only through separate topic chapters or individual technical thresholds;

8. the effect of the proposed turbine layout on the Rafter family house at Derryvella, adjoining family lands, private outlook, residential amenity, local settlement and lived landscape experience, having regard to the verified distance and bearing schedule showing four turbines within approximately 2 km, seven within approximately 3 km, nine within approximately 4 km, and all 11 proposed turbines within approximately 5 km;

9. the effect of the proposed development on Lough Doire Bhile, the Lough Doire Bhile Loop, the Littleton Labyrinth Greenway, planned amenity routes and the wider future of the Littleton Bog Group;

10. whether community-benefit measures, including the Community Benefit Fund and Near Neighbour Scheme, have been clearly distinguished from environmental assessment and have not been treated as a substitute for assessing residential, landscape, amenity or land-use effects;

11. whether the cumulative landscape and community setting has been adequately assessed having regard to the proposed Littleton Wind Farm and the surrounding pattern of operational, consented and proposed wind-energy development;

12. whether the proposed development represents proper planning and sustainable development when assessed against the wider post-peat transition of the area, including rehabilitation, biodiversity recovery, residential amenity, community amenity, landscape character, adjoining land-use potential and the long-term future of the local community.

If those matters cannot be satisfactorily resolved, I request that permission be refused.

In the alternative, if the Commission is minded to grant permission, I request that it do so only after requiring further information, revised assessment and clear enforceable commitments sufficient to demonstrate that the proposed development has been assessed against the reasonable future condition of the receiving environment, and not merely against a static snapshot of the current post-Phase 1 condition.

This request is not made on the basis of opposition to renewable energy in principle. It is made because the current application has not, in my submission, adequately demonstrated that this specific wind farm proposal is compatible with the rehabilitation, ecological, residential, community, landscape and future land-use potential of the Littleton Bog Group.

8. References

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Bord na Móna (2025) Ballybeg/Lanespark/Derryvella Cutaway Bog Decommissioning and Rehabilitation Plan 2025. Newbridge: Bord na Móna.

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Curlew Task Force (2019) Action for Curlew in Ireland: Recommendations of the Curlew Task Force. Summary document, May 2019. Dublin: Department of Culture, Heritage and the Gaeltacht.

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Fehily Timoney (2026b) Environmental Impact Assessment Report for the Proposed Littleton Wind Farm, County Tipperary: Chapter 5 – Population and Human Health. Cork: Fehily Timoney & Company.

Fehily Timoney (2026c) Environmental Impact Assessment Report for the Proposed Littleton Wind Farm, County Tipperary: Chapter 7 – Ornithology. Cork: Fehily Timoney & Company.

Fehily Timoney (2026d). Collision Risk Modelling Report: Littleton Wind Farm. Cork: Fehily Timoney & Company.

Fehily Timoney (2026e) Environmental Impact Assessment Report for the Proposed Littleton Wind Farm, County Tipperary: Chapter 17 – Schedule of Mitigation and Monitoring Measures. Cork: Fehily Timoney & Company.

Fehily Timoney (2026f). Non-Technical Summary: Littleton Wind Farm, County Tipperary. Cork: Fehily Timoney & Company.

Fehily Timoney (2026g) Landscape and Visual Impact Assessment. Photomontage: VP27 Lough Doire Bhile Loop. Cork: Fehily Timoney & Company.

Fehily Timoney (2026h) Peat and Spoil Management Plan: Littleton Wind Farm. Cork: Fehily Timoney & Company.

Fehily Timoney (2026i) Environmental Impact Assessment Report for the Proposed Littleton Wind Farm, County Tipperary: Chapter 9 – Hydrology, Hydrogeology and Water Quality. Cork: Fehily Timoney & Company.

Scottish Natural Heritage (2018) Assessing the Cumulative Impacts of Onshore Wind Farms on Birds: Guidance. Inverness: Scottish Natural Heritage.

9. Appendices

Appendix A: Evidence Matrix — Phase 1 / Phase 2 Rehabilitation

This appendix summarises the evidence relevant to the distinction between Phase 1 standard rehabilitation and Phase 2 enhanced rehabilitation at Ballybeg, Lanespark and Derryvella. It is provided to support Ground 1 of this submission.

1. Industrial peat extraction ceased

Evidence:

The Ballybeg/Lanespark/Derryvella rehabilitation documentation records that industrial peat production at Ballybeg, Lanespark and Derryvella ceased in 2017.

Relevance:

This confirms that the Littleton Bog Group is now in a post-extraction phase. The future land-use question is therefore not whether peat extraction should continue, but what the appropriate post-peat trajectory of the landscape should be.

Source:

Bord na Móna (2025) Ballybeg/Lanespark/Derryvella Cutaway Bog Decommissioning

and Rehabilitation Plan 2025.

2. Phase 1 rehabilitation was undertaken

Evidence:

The 2025 rehabilitation plan records that Phase 1 rehabilitation works were undertaken across Ballybeg, Lanespark and Derryvella between 2018 and 2021. Those works included standard rehabilitation measures such as drain blocking and hydrological management.

Relevance:

This confirms that Lanespark has already received Phase 1 rehabilitation. The submission does not dispute that. The issue is whether Phase 1 should be treated as the complete future baseline, or whether further enhanced rehabilitation potential should have been assessed.

Source:

Bord na Móna (2025) Ballybeg/Lanespark/Derryvella Cutaway Bog Decommissioning and Rehabilitation Plan 2025.

3. Phase 1 rehabilitation is standard rehabilitation

Evidence:

The rehabilitation documentation links Phase 1 works to standard environmental stabilisation and licence-compliance rehabilitation under EPA IPC Licence Ref. P0499-01, including Condition 10.2.

Relevance:

This is important because standard rehabilitation is not the same as enhanced rehabilitation. The fact that Phase 1 works occurred does not, by itself, demonstrate that the full future rehabilitation potential of Lanespark has been assessed or achieved.

Source:

Bord na Móna (2025) Ballybeg/Lanespark/Derryvella Cutaway Bog Decommissioning and Rehabilitation Plan 2025.

4. Phase 2 enhanced rehabilitation is a different pathway

Evidence:

Bord na Móna's PCAS methodology distinguishes enhanced rehabilitation from standard rehabilitation. Enhanced rehabilitation is intended to deliver additional climate, hydrological, biodiversity, water-quality and ecosystem-service benefits, subject to site suitability, funding and site-specific selection.

Relevance:

This establishes that Phase 2 is not merely a repeat of Phase 1. It is a different rehabilitation pathway with potentially different environmental outcomes. The EIAR should therefore explain whether any enhanced rehabilitation scenario for Lanespark was considered.

Source:

Bord na Móna (2022) Methodology Paper for the Enhanced Decommissioning, Rehabilitation and Restoration on Bord na Móna Peatlands – Preliminary Study.

5. Lanespark was not proposed for Phase 2 rehabilitation

Evidence:

The 2025 rehabilitation plan states that Lanespark was rehabilitated during 2018–2021 but is not proposed for Phase 2 rehabilitation because Bord na Móna and SSE are developing the proposed Littleton Wind Farm across Lanespark Bog, Littleton Bog and part of Longfordpass.

Relevance:

This is the central evidence point for Ground 1. It indicates that Lanespark was excluded from Phase 2 consideration in the context of the proposed wind farm footprint, rather than being transparently assessed and rejected on ecological, hydrological, climate or technical grounds.

Source:

Bord na Móna (2025) Ballybeg/Lanespark/Derryvella Cutaway Bog Decommissioning and Rehabilitation Plan 2025.

6. Lanespark was mapped as a constraint

Evidence:

The rehabilitation plan records Lanespark as a constraint on rehabilitation mapping because of the proposed Littleton Wind Farm footprint.

Relevance:

This supports the concern that the proposed wind-farm land use may already have shaped the rehabilitation baseline being presented. The Commission should therefore ask whether the Phase 1 condition is an uninfluenced environmental baseline or a land-use-constrained baseline.

Source:

Bord na Móna (2025) Ballybeg/Lanespark/Derryvella Cutaway Bog Decommissioning and Rehabilitation Plan 2025.

7. Ballybeg and Derryvella were considered for Phase 2

Evidence:

The 2025 rehabilitation plan considered Ballybeg and Derryvella for Phase 2 enhanced rehabilitation, while Lanespark was excluded because of the proposed Littleton Wind Farm footprint.

Relevance:

This comparison matters because Lanespark is part of the same closely linked bog group. The applicant should explain why Lanespark was excluded from enhanced rehabilitation consideration and whether partial, integrated or mixed rehabilitation scenarios were assessed.

Source:

Bord na Móna (2025) Ballybeg/Lanespark/Derryvella Cutaway Bog Decommissioning and Rehabilitation Plan 2025.

8. Rehabilitation outcomes are monitored as trajectories

Evidence:

The EDRRS/PCAS monitoring material describes rehabilitation outcomes as ongoing trajectories involving hydrology, carbon emissions, biodiversity benefits and surface-water quality. It also recognises that vegetation change may be slow and that water-table response may be an important indicator of rehabilitation progress.

Relevance:

This supports the submission that rehabilitation should not be assessed only by asking whether works have physically occurred. The relevant planning question is whether the EIAR has assessed the reasonable future condition of the receiving environment.

Source:

Bord na Móna and RPS (2024) Enhanced Decommissioning, Rehabilitation and Restoration Scheme Annual Monitoring and Verification Report: EDRRS Year 2, April 2022 to March 2023.

9. Key conclusion from the matrix

The evidence does not prove that Lanespark definitely would have received Phase 2 enhanced rehabilitation if the proposed wind farm had not been brought forward. However, it does show that Lanespark was excluded from Phase 2 consideration in the context of the proposed Littleton Wind Farm footprint.

The Commission should therefore not treat the Phase 1 rehabilitated condition of Lanespark as the complete future baseline unless the applicant explains whether enhanced, partial, integrated or mixed rehabilitation scenarios were considered and reasonably excluded.

Appendix B: Curlew Evidence Note

This appendix summarises the Curlew evidence relevant to Ground 2 of this submission. It is provided to support the submission that ecological risk to Curlew should not be assessed by modelled collision risk alone.

1. Curlew is identified as an ornithological receptor

The EIAR identifies Curlew as an ornithological receptor at the proposed Littleton Wind Farm site. Curlew were recorded during vantage point surveys, breeding bird surveys and breeding wader/waterbird surveys. The EIAR records Curlew observations during winter survey periods and during the 2021, 2022, 2023 and 2024 breeding seasons (Fehily Timoney, 2026c).

Relevance:

This confirms that Curlew is not a speculative or incidental issue. The species was recorded through the applicant's own survey work and is directly relevant to the ecological assessment.

2. Derryhogan Lakes supported a breeding Curlew pair over four breeding seasons

The EIAR records a breeding Curlew pair occupying the Derryhogan Lakes wetland mosaic in each of the 2021, 2022, 2023 and 2024 breeding seasons. The pair was assessed as likely to have bred successfully in 2021 and 2022. Breeding success could not be determined in 2023 and 2024 (Fehily Timoney, 2026c).

Relevance:

This shows repeated occupation of the same local territory. Derryhogan Lakes should therefore be treated as an established local breeding territory, not as a one-off or casual Curlew record.

3. The territory is outside the turbine buffer but inside the disturbance buffer

The EIAR records the Derryhogan Lakes Curlew territory as being outside the 500 m turbine buffer. However, it is also recorded as being inside the 500 m noise and visual disturbance buffer. The proposed amenity track bordering Derryhogan Lakes is approximately 70 m from areas where Curlew activity was recorded (Fehily Timoney, 2026c).

Relevance:

This is central to the submission. The Curlew issue is not resolved simply because the breeding territory is outside the 500 m turbine buffer. Disturbance, amenity access, construction activity and functional habitat effects remain relevant pathways.

4. Construction disturbance is acknowledged by the applicant

The EIAR states that noise disturbance from construction activity has potential to cause displacement and/or disturbance to breeding Curlew at Derryhogan Lakes. It also states that expected effects to the local breeding Curlew population arise before mitigation because Derryhogan Lakes is inhabited by a breeding Curlew pair and has high levels of Curlew activity (Fehily Timoney, 2026c).

Relevance:

This confirms that disturbance is not an external or speculative concern. It is identified within the applicant's own assessment.

5. Collision risk is assessed as low, but consequence may be severe locally

The Collision Risk Modelling Report assesses predicted collision effects for Curlew as low locally and negligible nationally. However, the same report identifies Curlew for assessment because of poor conservation status, low breeding success and limited breeding distribution in the region. It also states that only one breeding territory is known in the locality or wider region (Fehily Timoney, 2026d).

Relevance:

This creates a probability-consequence issue. Low modelled collision probability should not be evaluated in isolation from the possible local consequence where the receptor is a single known breeding territory.

6. Loss of one adult could result in loss of the local breeding population

The Collision Risk Modelling Report states that, because only a single Curlew pair is present at Littleton and within the wider region, the potential loss of one breeding adult through collision could result in loss of the local breeding population (Fehily Timoney, 2026d).

Relevance:

This is one of the most important pieces of evidence in the Curlew assessment. It shows that even a low-probability event may have serious local consequences because the local breeding population is extremely small.

7. Mitigation confirms that disturbance and access effects require active management

The mitigation schedule proposes that construction works within 500 m of Derryhogan Lakes occur outside the breeding season from 1 March to 31 August. It also proposes daylight working limits and a permanent 2 m high berm to prevent noise and visual disturbance to Curlew and other bird species breeding at Derryhogan Lakes (Fehily Timoney, 2026e).

Further mitigation is proposed for amenity trail and access infrastructure, including fencing to prevent dogs and walkers from accessing key bird habitats, willow screening, signage requiring users to remain on trails and control dogs, and design measures intended to discourage users from deviating from trails in key areas (Fehily Timoney, 2026f).

Relevance:

The mitigation may reduce risk, but its presence also confirms that disturbance and amenity-related effects require active management. The assessment should therefore explain how these measures would be secured, enforced, monitored and adapted over the lifetime of the wind farm.

8. National conservation context

The Curlew Task Force records that Curlew is the only Irish bird on the IUCN Red List of Threatened Species, and that the Irish breeding population was estimated at 138 pairs, representing an estimated decline of 96% since the 1988–1991 Bird Atlas population estimate (Curlew Task Force, 2019).

The Curlew Task Force also records that bogs are a vitally important part of the ecological and conservation requirements of Curlew in Ireland, and that it is believed that two-thirds of Curlew in Ireland are nesting on bogs and using nearby grasslands or other habitats to supplement the diet they obtain on bogs (Curlew Task Force, 2019).

Relevance:

The Derryhogan Lakes territory should be assessed in the context of severe national decline and the recognised importance of bog landscapes to Irish breeding Curlew.

9. Key conclusion from the Curlew evidence

The Curlew issue should not be assessed by turbine collision risk alone. The evidence shows that the proposed development raises questions of functional habitat loss, disturbance, displacement, amenity access, mitigation certainty, breeding productivity and future recovery potential.

The Commission should therefore require the applicant to demonstrate that the proposed development would not materially undermine the functional integrity, breeding security or future recovery potential of the Derryhogan Lakes Curlew territory.

Appendix C: Community and Landscape Evidence Note

This appendix summarises the community, residential, landscape, amenity and future land-use evidence relevant to Ground 3 of this submission. It is provided to support the submission that the proposed Littleton Wind Farm should be assessed as a long-term land-use decision for a recovering post-peat community and landscape, not only as a set of turbines assessed through separate technical thresholds.

1. The proposed development is not limited to turbines

Details:

The proposed Littleton Wind Farm includes 11 turbines, turbine foundations and hardstands, internal access tracks, drainage infrastructure, an onsite 110 kV substation, grid connection works, peat and spoil management areas, vegetation clearance, temporary construction compounds, borrow pit works, amenity infrastructure and biodiversity enhancement measures (Fehily Timoney, 2026a).

Relevance:

This confirms that the proposed development is a substantial infrastructure project. It would introduce a wider package of physical works and long-term land-use change into the Littleton Bog Group, rather than only turbine structures.

2. Chapter 5 assesses population, human health and amenity issues

Details:

The EIAR Chapter 5 assessment considers effects on population, employment and economic activity, land use, recreation, amenity, tourism, human health and safety across construction, operation and decommissioning. It also relies on other EIAR chapters for pathways including noise, shadow flicker, air quality, traffic, hydrology, slope stability, flood risk, landscape and visual effects, and material assets (Fehily Timoney, 2026b).

Relevance:

This confirms that community and human effects are spread across several assessment topics. That structure may be acceptable, but the Commission should ensure that the combined lived effect on the local community has not been lost between separate technical chapters.

3. The receiving environment is rural and settled

Details:

Chapter 5 identifies the receiving environment as rural, with nearby villages and settlements around the site. It uses census data for the population baseline and Eircode/Geodirectory data for residential receptors. It identifies the closest residential receptor as approximately 851 m south-west of turbine T11 (Fehily Timoney, 2026b).

Relevance:

This confirms that the proposed development would not be located in an empty or uninhabited landscape. It would be experienced in a rural setting containing houses, local roads, farms, villages, amenity routes and adjoining lands.

4. The Rafter family house is in close proximity to the proposed turbine layout

Details:

The verified distance and bearing schedule prepared from ITM coordinates records that the nearest proposed turbine to the Rafter family house at Derryvella is T10 at approximately 1,592 m. The next nearest turbines are T9 at approximately 1,659 m, T11 at approximately 1,780 m and T8 at approximately 1,995 m. The same schedule records four proposed turbines within approximately 2 km of the family house, seven proposed turbines within approximately 3 km, nine proposed turbines within approximately 4 km, and all 11 proposed turbines within approximately 5 km.

The verified ITM grid bearings also show that T10, T9 and T11 lie generally to the south-west, west-south-west and south-south-west of the family house respectively, while the remaining turbines lie generally to the north and north-north-east.

Relevance:

This confirms that the proposed turbine layout would not be a distant or abstract feature in relation to the Rafter family house and adjoining lands. It is relevant to residential amenity, private outlook, adjoining family lands, local settlement, cumulative visibility, landscape character and the combined lived effect of the proposed development. This is not presented as a standalone private-view objection. It is presented as spatial evidence relevant to the wider Ground 3 assessment.

5. The applicant identifies community and socio-economic benefits

Details:

The applicant identifies positive socio-economic effects, including employment, commercial rates, development contributions, a Community Benefit Fund, a Near Neighbour Scheme and renewable-electricity benefits. Chapter 5 estimates that the proposed Community Benefit Fund could be approximately €5.5 million over the first 15 years of the fund, based on proposed annual electricity generation (Fehily Timoney, 2026b).

Relevance:

These benefits are relevant and should be acknowledged. However, financial and community-benefit measures should not be treated as a substitute for assessing residential amenity, landscape character, amenity experience, adjoining land-use potential or the future direction of the Littleton Bog Group.

6. Lough Doire Bhile is an established amenity and rehabilitation feature

Details:

The rehabilitation documentation identifies Lough Doire Bhile as an amenity area developed on former cutaway bog between 1999 and 2001, now leased to the Slieve Ardagh Rural Development community group. It also records the Lough Doire Bhile loop as a 2.4 km walking trail, and maps Lough Doire Bhile Wildlife Reserve and amenity area as constraints in the rehabilitation plan (Bord na Móna, 2025).

Relevance:

This confirms that Lough Doire Bhile is not merely an unused part of the former industrial peatland. It is already recognised as an amenity, wildlife reserve and rehabilitation feature within the post-peat landscape.

7. The Littleton Labyrinth and future amenity routes form part of the post-peat future

Details:

The rehabilitation documentation records that the Littleton Labyrinth was developed in partnership with Tipperary County Council. It describes an amenity walking/cycling track along the headland and former rail-line corridors on the northwestern margins of Derryvella Bog, linking to the Lough Doire Bhile amenity area as part of the Littleton Labyrinth Greenway in 2024. It also records planned additional amenity trails associated with the Midlands Network Trail, including shared cycle and walking routes, signage and fencing (Bord na Móna, 2025).

Relevance:

This shows that the Littleton Bog Group is already being re-used and re-imagined for public amenity, walking, cycling, access and community purposes. The wind-farm proposal should therefore be assessed against that wider post-peat trajectory.

8. The proposed development would be experienced from Lough Doire Bhile

Details:

The landscape and visual material includes a specific viewpoint from the Lough Doire Bhile Loop. The VP27 photomontage material identifies the Lough Doire Bhile Loop viewpoint and records turbine T10 as the nearest visible turbine at approximately 0.7 km from that viewpoint (Fehily Timoney, 2026g).

Relevance:

This does not automatically make the development unacceptable. However, it confirms that the proposed development would be experienced directly from an established community amenity and rehabilitation landscape, not only from distant or abstract viewpoints.

9. The proposal would involve significant peat, spoil and water-context interventions

Details:

The Peat and Spoil Management Plan records that excavated peat and spoil would be transported to designated deposition areas as access tracks and hardstands are developed. It also identifies peat and spoil volumes associated with turbines, hardstands and internal access tracks (Fehily Timoney, 2026h).

Chapter 9 records that proposed infrastructure is distributed across multiple bog areas and waterbody catchments. For Ballybeg/Lanespark/Derryvella Bog, the listed infrastructure includes internal site access tracks, amenity tracks, peat deposition areas and turbines T9, T10 and T11 within the North Glengoole_010 and Breagagh_010 waterbody contexts (Fehily Timoney, 2026i).

Relevance:

This reinforces that the proposed wind farm is a substantial land-use intervention in a recovering bog landscape. It is not simply a visual or residential-distance issue.

10. The wider wind-farm context is relevant to cumulative landscape setting

Details:

The wider spatial material identifies the proposed Littleton Wind Farm as the subject development, with 11 turbines and a stated maximum tip height of 200 m. It also identifies a wider surrounding wind-energy context, including operational, consented or proposed wind farms such as Ballincurry, Gurteen, Knocknamuck/Cnoc, Farranrory, Kill Hills, Ballybay, Lisheen I, Lisheen II, Lisheen III, Brittas, Foyle/Foyleature, Kyleballyoughter, Knockroe, Brisklagh, Bruckana, Borrisbeg and Lisdowney.

Relevance: This does not replace the site-specific assessment of Littleton Wind Farm. However, it confirms that the proposed development would be experienced within a wider cumulative wind-energy landscape. The Commission should therefore consider the proposed Littleton Wind Farm both in its own right and as part of the wider cumulative landscape and community setting.

11. Key conclusion from the community and landscape evidence

The evidence shows that the proposed Littleton Wind Farm should be assessed as a long-term land-use decision for the Littleton Bog Group. The landscape is already moving beyond industrial peat extraction toward rehabilitation, biodiversity recovery, amenity use, walking and cycling routes, wildlife value, local memory, residential use, family land use and community identity.

The Commission should therefore require the applicant to demonstrate that the proposal has been assessed against the wider post-peat future of the area, including residential amenity, community amenity, landscape character, rehabilitation, biodiversity recovery, adjoining land-use potential and the long-term future of the local community.

Appendix D: Relevant Maps and Figures

Table D1: Verified distance and bearing schedule from the Rafter family house to the proposed turbines

The following table records approximate straight-line ITM distances and ITM grid bearings from the Rafter family house at Derryvella to each proposed Littleton Wind Farm turbine. Distances are straight-line geometric distances and do not represent road distance, walking distance, travel distance or visibility distance.

Turbine	Verified distance	ITM grid bearing	Simplified direction
T10	1,592 m	226.3°	SW
T9	1,659 m	242.5°	WSW
T11	1,780 m	212.1°	SSW
T8	1,995 m	18.1°	NNE
T7	2,349 m	1.6°	N
T6	2,767 m	22.5°	NNE
T5	2,878 m	8.2°	N
T4	3,564 m	10.1°	N
T3	3,706 m	18.8°	NNE
T2	4,321 m	17.8°	NNE
T1	4,907 m	19.6°	NNE

Table D2: Radial proximity breakdown from the Rafter family house

Radius from Rafter family house	Number of proposed turbines within radius	Turbines within radius
1 km	0	None
2 km	4	T10, T9, T11, T8
3 km	7	T10, T9, T11, T8, T7, T6, T5
4 km	9	T10, T9, T11, T8, T7, T6, T5, T4, T3
5 km	11	T10, T9, T11, T8, T7, T6, T5, T4, T3, T2, T1

Summary: The verified calculations show that four proposed turbines are located within approximately 2 km of the Rafter family house, seven within approximately 3 km, nine within approximately 4 km, and all 11 proposed turbines are located within approximately 5 km.

Note: Distances are straight-line ITM distances from the Rafter family house. They do not represent road distance, walking distance, travel distance or visibility distance.

Figure D3: Rafter family house, proposed turbines and distance rings

Figure D3 shows the spatial relationship between the Rafter family house at Derryvella and the 11 proposed Littleton Wind Farm turbines. The figure includes the family house, proposed turbine locations, distance rings from the house, a north arrow, scale bar and legend.

The figure is provided to assist the Commission in understanding the proximity and layout of the proposed turbines relative to the family house and adjoining lands. It should be read together with Table D1, which provides the verified house-to-turbine distance and bearing schedule, and Table D2, which summarises the radial proximity breakdown.

The figure is not submitted as a standalone private-view objection. It is provided as spatial context relevant to residential amenity, adjoining lands, landscape character, cumulative visibility and the combined lived effect of the proposed development.

Spatial material prepared for this submission

Spatial calculations and map data were prepared by the submitter for Appendix D, including the house-to-turbine distance schedule, radial proximity breakdown and ITM map-point list.

Appendix E: Personal / Local Knowledge Statement

My name is Robert Rafter. I am originally from Derryvella and Glengoole, County Tipperary. I am 42 years old and currently live in Sydney, Australia, where I work in Natural Resource Management.

My professional work involves supervising ecological restoration and natural regeneration programs. This includes invasive species management, biodiversity conservation, vegetation management, field operations, mapping, monitoring, work planning and the coordination of restoration crews. I hold a BSc in Environmental and Natural Resource Management from Limerick Institute of Technology, completed in 2017, and I have worked in the ecological restoration and rehabilitation sector in Sydney for several years.

This statement is not offered as expert evidence. It is provided as local context. It explains my personal, family, cultural and practical relationship with the Littleton Bog Group, Derryvella, Lanespark, Lough Doire Bhile and the surrounding landscape.

My family has a long connection with Derryvella. The Rafter family connection with Glengoole and Derryvella, dates back to at least 1885. My father and uncle have farmed family land in the area for many decades. The land has been used as a small beef-farming enterprise, and parts of the holding have changed over time, including areas of marginal peaty ground that were reclaimed for agricultural use in the 1990s.

My earliest memories are tied to Derryvella, Glengoole, the bog, rural life, farming, turf and Bord na Móna. As a child, the area was part of everyday life. I remember the Bord na Móna factory, the machinery, the temporary tracks, the rail lines, the bog roads, turf cutting, turf footing, contractors, drains, bogholes and the Black River. I also remember private turf cutting and family turbary use. These are not abstract landscape features to me. They are part of the lived history of the community.

My father worked for Bord na Móna, first seasonally in the field and later full-time in the factory at Lanespark. Like many families locally, our family history is connected both to farming and to Bord na Móna. The bog was a place of work, energy production, rural labour, community identity and local memory. It was also a place that shaped how people understood the landscape around them.

Although I now live in Australia, I still return home when I can. My current visa expires in 2028 and it is my current intention to return home. I know the area from childhood, family use, farming, fishing, walking, driving the local roads and returning as an adult with ecological training and restoration experience. I know the bog roads, streams, drains, raised bog remnants, reclaimed land, farmland, hedgerows, Lough Doire Bhile, the Black River and the wider landscape around Derryvella, Derryhogan, Glengoole and Lanespark.

The landscape is important to me because it is home. It is a rural landscape at the foot of the Slieveardagh Hills, with narrow bog roads, hedgerows, farmland, peatland history, industrial history, local ruins, watercourses and places of memory. It has been shaped by coal, peat, farming, forestry, Bord na Móna, rehabilitation and, more recently, wind-energy development in the wider area.

I am not opposed to renewable energy in principle. I support renewable energy, including wind, solar, wave, geothermal and heat-pump technologies. I also accept that Ireland needs to become more energy independent and that climate action is necessary. My concern is with the placement of major renewable-energy infrastructure on peatland landscapes, including former industrial peatland landscapes where rehabilitation, biodiversity recovery, water management, community amenity and future land-use choices remain live issues.

My concern about the proposed Littleton Wind Farm is not simply visual or personal. It is that the proposal would place another long-term industrial land use into a landscape that has already carried a significant environmental and cultural burden from energy production. The area has already given a great deal through peat extraction and associated industrial activity. In my view, the post-extraction future of the Littleton Bog Group should not be treated as fixed or inevitable without a full and transparent assessment of rehabilitation, ecological recovery, community amenity and future land-use potential.

From my own professional background, I understand that ecological restoration and rehabilitation are long-term processes. Landscape recovery is not measured only by whether works have physically occurred. It depends on hydrology, vegetation succession, habitat function, soil and water conditions, disturbance, monitoring and adaptive management. My concern is that the future rehabilitation trajectory of Lanespark and the wider Littleton Bog Group has not been fully explained before another major infrastructure use is proposed.

I also consider the area to have future community and ecological potential. Lough Doire Bhile, the surrounding walking routes, the Black River, the OPW monument north of Lough Doire Bhile, the Reen viewing area, local heritage features, the Holy Year Cross, Coalbrook mining history and the wider bog landscape could form part of a broader post-peat community, ecological and heritage landscape. In my view, the best future for the Littleton Bog Group would be active rehabilitation, biodiversity recovery, threatened-species management, low-impact amenity, heritage interpretation and community use.

I also see potential for parts of family land and other marginal lands to move toward ecological succession, rewetting where suitable, lower-impact land use and carbon-friendly rural activity. I do not present that as a formal development proposal. I mention it because adjoining landowners and local families should not be treated as though the only realistic future for the area is renewed industrial energy infrastructure.

This statement is therefore provided to explain my connection to the area and why I have made this submission. The Littleton Bog Group is not simply a former industrial site. It is a working, remembered, recovering and culturally important landscape. It has supported farming, work, energy production, wildlife, community identity and local recreation. The planning assessment should recognise that the future of this landscape is not only a technical question of turbine layout, but a long-term decision about rehabilitation, ecology, amenity, local identity and the next chapter of a post-peat community landscape.

Appendix F: Source Documents Reviewed

The following source documents were reviewed and relied upon in preparing this submission.

1. Bord na Móna rehabilitation and peatland documentation

Bord na Móna (2022) Methodology Paper for the Enhanced Decommissioning, Rehabilitation and Restoration on Bord na Móna Peatlands – Preliminary Study. Version 19, November 2022. Newbridge: Bord na Móna.

Bord na Móna (2025) Ballybeg/Lanespark/Derryvella Cutaway Bog Decommissioning and Rehabilitation Plan 2025. Newbridge: Bord na Móna.

Bord na Móna and RPS (2024) Enhanced Decommissioning, Rehabilitation and Restoration Scheme Annual Monitoring and Verification Report: EDRRS Year 2, April 2022 to March 2023. Final Rev. B, 1 July 2024. Newbridge: Bord na Móna.

2. Littleton Wind Farm planning application material

Fehily Timoney (2026a) Strategic Infrastructure Development Planning Application Cover Letter: Littleton Wind Farm. Cork: Fehily Timoney & Company. Submitted to An Coimisiún Pleanála, 15 June 2026.

Fehily Timoney (2026b) Environmental Impact Assessment Report for the Proposed Littleton Wind Farm, County Tipperary: Chapter 5 – Population and Human Health. Cork: Fehily Timoney & Company.

Fehily Timoney (2026c) Environmental Impact Assessment Report for the Proposed Littleton Wind Farm, County Tipperary: Chapter 7 – Ornithology. Cork: Fehily Timoney & Company.

Fehily Timoney (2026d) Collision Risk Modelling Report: Littleton Wind Farm. Cork: Fehily Timoney & Company.

Fehily Timoney (2026e) Environmental Impact Assessment Report for the Proposed Littleton Wind Farm, County Tipperary: Chapter 17 – Schedule of Mitigation and Monitoring Measures. Cork: Fehily Timoney & Company.

Fehily Timoney (2026f) Non-Technical Summary: Littleton Wind Farm, County Tipperary. Cork: Fehily Timoney & Company.

Fehily Timoney (2026g) Landscape and Visual Impact Assessment Photomontage: VP27 Lough Doire Bhile Loop. Cork: Fehily Timoney & Company.

Fehily Timoney (2026h) Peat and Spoil Management Plan: Littleton Wind Farm. Cork: Fehily Timoney & Company.

Fehily Timoney (2026i) Environmental Impact Assessment Report for the Proposed Littleton Wind Farm, County Tipperary: Chapter 9 – Hydrology, Hydrogeology and Water Quality. Cork: Fehily Timoney & Company.

3. Guidance and conservation material

Curlew Task Force (2019) Action for Curlew in Ireland: Recommendations of the Curlew Task Force. Summary document, May 2019. Dublin: Department of Culture, Heritage and the Gaeltacht.

Environmental Protection Agency (2022) Guidelines on the Information to be Contained in Environmental Impact Assessment Reports. Wexford: Environmental Protection Agency.

Scottish Natural Heritage (2018) Assessing the Cumulative Impacts of Onshore Wind Farms on Birds: Guidance. Inverness: Scottish Natural Heritage.

4. Local knowledge material

Robert Rafter personal and local knowledge statement, prepared as Appendix E to this submission.

5. Spatial material prepared for this submission

Spatial calculations and map data prepared by the submitter for Appendix D, including the house-to-turbine distance schedule, radial proximity breakdown and ITM map-point list.