

OBSERVATION ON PROPOSED LITTLETON WIND FARM

An Coimisiún Pleanála

Case Reference: PAX92.324370

Proposed Development: Littleton Wind Farm, County Tipperary

Observer: Rona Sorrell

Correspondence Address: 11 Gortataggart, Brittas Rd, Thurles, Co. Tipperary

Date: 11/07/2026

1. Introduction

I wish to make an observation in relation to the proposed Littleton Wind Farm development in County Tipperary.

I have concerns regarding the potential effects of the proposed development on residential amenity, landscape character, visual amenity, public recreation, tourism, traffic, biodiversity, peatland, drainage and the wider environment.

These concerns arise both from my personal connection with the area and from my involvement in local community and recreational amenities.

I am currently renovating a cottage on the R639, approximately 2.1 km from the nearest proposed turbine. The property is situated at approximately 150 metres above sea level. Although I do not currently reside there, I am undertaking the renovation with the intention of making the cottage my permanent home.

The proposed development will therefore have a direct bearing on the residential environment in which I am investing and intend to live.

2. The significance of the approximately 2.1 km distance

I wish to explain why I have specifically identified the approximate 2.1 km distance between my property and the nearest proposed turbine.

At a previous community meeting concerning the proposed development, I identified the location of my property and asked how it would be treated in relation to the proposed turbines.

I was informed, in substance, that the property was more than 2 km from the proposed turbines. My understanding was that this response related to a distance used by the developer in connection with financial compensation or similar arrangements.

For the avoidance of doubt, **my concern in making this observation is not about financial compensation.** I am not seeking compensation, nor do I consider financial compensation to be an appropriate substitute for the proper assessment of the planning and environmental effects of the proposed development.

I refer to the earlier discussion solely because it appeared that the approximate 2 km distance was being treated as significant for the purposes of the developer's compensation arrangements.

However, the distance of a residence from a wind turbine cannot, of itself, determine whether that residence will experience significant effects on residential or visual amenity.

My property is located approximately 2.1 km from the nearest proposed turbine at an elevation of approximately 150 metres above sea level. It has a direct elevated outlook towards the proposed turbine group, whose maximum blade-tip height is

approximately 200 metres.

The applicant's own Landscape and Visual Impact Assessment (LVIA) recognises that spatial dominance is most likely to occur within approximately 3 km of the development and that elevated locations may be particularly susceptible to visual effects.

Accordingly, I respectfully ask the Commission to assess the particular characteristics and sensitivity of my property on its own merits, rather than treating the fact that it lies marginally beyond a compensation distance as indicating that its residential visual amenity will not be materially affected.

The existence or otherwise of financial compensation is not a planning consideration in determining the likely effects of the proposed development on residential amenity, visual amenity or the environment. Those matters must be assessed on their own planning merits.

3. Scale of the proposed turbines and residential visual impact

The proposed development comprises eleven turbines with a maximum blade-tip height of approximately 200 metres.

I am particularly concerned about the visual effects on my cottage because of its elevated position and direct outlook towards the proposed development.

The applicant's own LVIA identifies a number of principles that are directly relevant to my circumstances.

The LVIA states that a sense of spatial dominance is most likely to occur for highly sensitive receptors within approximately 3 km of the development. It also identifies the elevated lands around the Slieveardagh Hills as among the landscape areas most susceptible to visual effects, while recognising local residential properties as highly sensitive visual receptors.

These findings are directly relevant to my property.

The combination of its elevated position and its location approximately 2.1 km from the nearest proposed turbine places it within the distance range that the applicant itself identifies as potentially susceptible to spatial dominance.

Accordingly, I respectfully submit that the visual effects on my property should be assessed as those affecting an individual elevated residential receptor with a direct outlook towards the proposed turbine group, rather than being assumed to be adequately represented by more general public viewpoints or representative visual receptors.

4. The applicant's own assessment demonstrates the importance of elevated viewpoints

The applicant's assessment provides an important comparison at Viewpoint 17 (VP17).

VP17 is described as a locally elevated viewpoint approximately 1.8 km from Turbine T3. The applicant assesses the visual impact magnitude at this location as **High-Medium**, with the overall visual effect assessed as **Substantial-Moderate, Negative and Long Term**.

The LVIA describes the turbines at this elevated viewpoint as rising at a prominent scale in the near distance and becoming one of the most noticeable features of the landscape.

This assessment is directly relevant when considering my own property.

Given the similarities in elevation and proximity, I respectfully ask the Commission to consider whether the applicant's visual assessment adequately represents the likely experience from my property, which is an elevated private dwelling located approximately 2.1 km from the nearest proposed turbine.

5. Loss of the existing summer sunset outlook

There is a particular aspect of the outlook from my cottage that I believe warrants specific consideration.

During the summer months, the sun sets behind a group of mature neighbouring trees visible from the property.

The proposed turbines would be situated between the cottage and this established sunset view.

The development would therefore introduce very large moving structures into an existing and valued component of the property's outlook.

My concern is not the visibility of wind turbines within the wider landscape in itself. Rather, it is the introduction of very large moving structures into an established view that contributes significantly to the character, enjoyment and residential amenity of the property.

I respectfully ask the Commission to require that the visual effects from the cottage itself be demonstrated by an accurately located and properly scaled photomontage.

Such a photomontage should illustrate:

- the actual elevation of the property;
- the existing trees;
- the relevant turbines;
- the blade-swept areas;
- the relative scale of the turbines; and
- the existing landscape context.

6. Adequacy of the applicant's selected viewpoints

The applicant states that representative viewpoints were selected to represent local community receptors and include amenity, heritage, population and scenic receptors.

However, the applicant's own assessment demonstrates that the character and significance of a view can vary considerably depending on elevation, openness and the particular relationship between the receptor and the proposed turbines.

For example, VP17 is an elevated viewpoint assessed as having a **High-Medium** visual impact magnitude, whereas other viewpoints at broadly comparable distances receive lower assessments because of differences in screening and landscape context.

Accordingly, I respectfully ask the Commission to consider whether the applicant's selected viewpoints adequately represent the likely visual experience from my property, having regard to its elevation, direct outlook towards the proposed turbine group and its sensitivity as a residential receptor.

7. The Reen Viewing Point – an established public visual amenity

I also have a direct connection with the Reen Viewing Point above New Birmingham village.

I am Supervisor of the Parish Community Employment Scheme, based in New Birmingham. As part of the work undertaken through the Scheme, I am involved in maintaining the Reen Viewing Point as a public amenity.

The Reen is an elevated location from which visitors experience extensive views across the surrounding landscape towards the mountains beyond, including the distinctive profile of the Devil's Bit.

Its importance is not merely a matter of personal opinion. Tipperary County Council's Landscape Character Assessment specifically identifies the Reen Viewing Point near New Birmingham as a location from which extensive views, particularly to the north, are afforded. The County's landscape documentation also recognises the aesthetic and recreational value of the surrounding landscape and its views.

The Reen therefore constitutes an established public visual amenity.

I am concerned that the introduction of eleven turbines, each with a maximum blade-tip height of approximately 200 metres, has the potential to materially alter the landscape experienced from this recognised viewpoint.

Accordingly, I respectfully ask the Commission to ensure that the Reen Viewing Point is fully assessed as an important public visual and recreational receptor.

8. Derryvella Lake – an important recreational amenity

I am also a member of the local Glengoose Development Group and have first-hand knowledge of the recent enhancement and increasing recreational use of Derryvella Lake.

Derryvella Lake is an established local recreational, walking, angling, heritage and conservation amenity.

Importantly, the applicant's own Landscape and Visual Impact Assessment (LVIA) expressly identifies Lough Doire Bhile (Derryvella Lake) and its looped walking trail as a notable amenity asset.

The applicant's representative viewpoint, VP27, is located at the lake and is assessed as having:

- **High-Medium** receptor sensitivity;
- **High-Medium** visual impact magnitude; and
- a **Substantial-Moderate, Negative and Long-Term** visual effect.

The applicant further acknowledges that the proposed turbines would become one of the most visually prominent features in the immediate landscape and would marginally reduce the sense of remoteness experienced at the lake.

I consider these findings to be highly significant.

Derryvella Lake is not simply an incidental feature within the study area. It is an established recreational destination whose landscape setting forms an integral part of the visitor experience.

I am concerned that the effects of the proposed development on the lake and its wider recreational setting should be afforded greater weight, particularly in light of the continuing investment in, and increasing public use of, this important community amenity.

9. Recreational and tourism development of the area

The area surrounding Littleton, Derryvella and New Birmingham is continuing to evolve.

Community groups and public bodies have invested in recreational amenities, walking infrastructure and the development of the area as a recreational and tourism resource.

As a member of the Glengoole Development Group, I have first-hand knowledge of the recent improvements made at Derryvella Lake and the increased visitor use that has followed.

The planning assessment should therefore consider not only the effects of the proposed development on the existing landscape, but also its potential impact on the future development and success of these community and tourism assets.

The issue is not whether visitors will technically continue to access the lake or the Reen Viewing Point following construction.

Rather, the relevant question is whether the introduction of very large moving industrial structures into the landscape would materially alter the landscape experience that attracts visitors to these locations in the first place.

10. Landscape policy and Visual Amenity

The applicant's own LVIA identifies the relevant policies of the Tipperary County Development Plan relating to the integration of new development with landscape character, sensitivity and value, including the Schedule of Protected Views and Scenic Routes.

The LVIA also identifies policies directed towards the protection of landscape character, landscape quality and visual amenity.

These policies require consideration of matters including visual prominence, landscape integration, scale, form and the use of existing landform to minimise adverse visual effects.

Given the exceptional scale of turbines with a maximum blade-tip height of approximately 200 metres, the issue of visual prominence assumes particular importance.

Accordingly, I respectfully ask the Commission to consider carefully whether the proposed development is compatible with the identified landscape sensitivities, visual amenity and landscape policies applicable to this part of County Tipperary.

11. Construction traffic and disruption

I also have concerns regarding the likely effects of the construction phase of the proposed development.

The scale of the proposal will require substantial construction activity, including heavy goods vehicles, abnormal loads, turbine components, construction plant, aggregate, concrete and associated infrastructure works.

I am particularly concerned about the potential effects on the R639 and the surrounding local road network.

These may include:

- increased HGV movements;
- abnormal-load movements;
- road safety impacts;
- deterioration in road condition;
- noise;
- dust;
- vibration;
- traffic delays;
- disruption to residents; and
- potential impacts on access for emergency services.

I respectfully ask the Commission to give careful consideration to the duration, intensity and cumulative effects of construction traffic, rather than treating these impacts as insignificant solely because they are temporary.

12. Peatland, drainage and water

The proposed development requires extensive new infrastructure within a landscape associated with former peat extraction and recovering peatland habitats.

I am concerned about the potential effects of the proposed roads, turbine foundations, drainage works and associated infrastructure on:

- surface-water runoff;
- drainage patterns;
- peat stability;
- sediment movement;
- water quality;
- downstream watercourses; and
- local hydrology.

I respectfully ask that the proposed mitigation measures be carefully scrutinised and that any permission, if granted, includes robust and enforceable conditions relating to drainage, water quality, peatland protection and long-term environmental monitoring.

13. Biodiversity, Recovering Habitats and Ecological Connectivity

I have significant concerns regarding the potential effects of the proposed development on biodiversity and the ecological functioning of the wider Littleton peatland landscape.

I recognise that parts of the area have a history of industrial peat extraction and that the applicant places considerable emphasis on the site's previous land use. However, the industrial history of the landscape should not be taken to mean that its current or emerging ecological value is necessarily low.

The landscape is undergoing active change. Former peat extraction areas are being rehabilitated and re-wetted, vegetation is recovering, wetland habitats are developing, and open-water areas are providing increasingly important feeding, breeding and

refuge habitat for wildlife.

Accordingly, the ecological baseline should be understood as a **recovering and evolving landscape**, rather than simply as a previously disturbed industrial landscape.

13.1 The ecological baseline is changing

The applicant's own ornithological assessment acknowledges the relevance of peatland rehabilitation to the ecological assessment. It states that the habitats and environmental conditions created by re-wetting measures already implemented at Littleton, Longfordpass and Lanespark form part of the existing ecological baseline.

This is an important acknowledgement.

Once rehabilitation measures have been implemented and ecological recovery is underway, previous industrial use cannot reasonably be relied upon to suggest that the landscape has little ecological value.

The environmental assessment should therefore consider the landscape as it exists today and as it is reasonably expected to develop over the operational lifetime of the proposed development.

Given that the proposed wind farm would operate for several decades, it is not sufficient to assess only the condition of the site at the time of construction. The Commission should also have regard to the continuing trajectory of ecological recovery already taking place.

The applicant itself identifies further biodiversity enhancement and peatland management measures within and around the site, recognising that the ecological value of the wider landscape is capable of further improvement.

I therefore respectfully ask the Commission to give proper weight to the principle that a recovering habitat is not an ecologically insignificant habitat.

13.2 Wetlands, lakes and peatland habitats are interconnected

The proposed development is located within a wider landscape comprising bogs, lakes, wetlands, recovering vegetation and open habitats.

These habitats should not be viewed as isolated parcels of land.

Wildlife moves between feeding, breeding, roosting and refuge areas. Consequently, the ecological importance of a habitat may extend well beyond the physical footprint of an individual turbine, road or hardstanding.

The applicant's own documentation illustrates this ecological connectivity.

For example, the Natura Impact Statement (NIS) identifies Bawnreagh Lakes, Derryhogan Lakes and Longfordpass South Lakes as important Hen Harrier hunting and feeding areas, while Clonoura Bog is identified as a roosting location. These habitats clearly function as components of a wider ecological network rather than as isolated sites.

Similarly, the ornithological assessment records breeding Teal at Longfordpass South Lakes and Derryhogan Lakes and acknowledges that these habitats lie within the potential construction-noise disturbance zone, with consequent potential for displacement during the breeding season.

These findings demonstrate that the wider landscape already performs important breeding, feeding and roosting functions for protected bird species.

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These findings demonstrate that the wider landscape already performs important breeding, feeding and roosting functions for protected bird species.

Accordingly, the Commission should consider not only the area of habitat directly affected by construction, but also the potential effects of the development on the **ecological functionality, integrity and connectivity of the wider habitat network**.

13.3 Hen Harrier and other sensitive bird species

I am particularly concerned about the potential effects of the proposed development on Hen Harrier.

The applicant's NIS identifies Hen Harrier feeding and roosting resources within the project area and acknowledges the potential for disturbance and displacement during construction. It specifically identifies Clonoura Bog as a roosting location and Bawnreagh Lakes, Derryhogan Lakes and Longfordpass South Lakes as important feeding habitats.

The NIS also acknowledges that construction works undertaken near the winter roost at Clonoura Bog could give rise to more significant displacement during the non-breeding season.

These findings are particularly important because the proposed development would introduce substantial permanent infrastructure into a landscape that already functions as valuable habitat.

The assessment should therefore not be confined to whether individual turbine foundations directly remove habitat.

Rather, the Commission should also consider whether the combined effects of:

- construction activity;
- heavy machinery;
- roads and hardstanding;
- turbine erection;
- operational turbine movement;
- noise;
- increased human activity;
- habitat fragmentation;
- changes in habitat use; and
- cumulative wind energy development,

could reduce the long-term suitability of the wider landscape for species that currently depend upon it.

13.4 Construction disturbance is not necessarily a minor or temporary issue

The applicant's assessment describes construction effects as temporary and proposes mitigation measures.

However, the NIS identifies a construction period of approximately **24 months** and acknowledges the potential for displacement of Hen Harrier from parts of the bog during that period.

The Commission should therefore consider the ecological consequences of prolonged construction activity within a recovering peatland and wetland landscape.

A construction period of approximately two years is significant in ecological terms.

Repeated disturbance during breeding, feeding or wintering periods may have consequences that are not adequately reflected by describing the effects as merely "temporary".

The relevant question is whether wildlife will be able to continue using these habitats effectively throughout the construction period and whether displaced species will have suitable alternative habitat available.

13.5 Habitat fragmentation and the cumulative effect of infrastructure

I am also concerned about habitat fragmentation.

The effects of a wind farm extend beyond the footprint of individual turbine foundations.

The development includes access roads, hardstandings, drainage infrastructure, underground cabling, a substation, construction compounds and associated infrastructure.

Although each element may occupy only a relatively small area, their combined effect has the potential to create a more fragmented landscape.

This is particularly significant within a recovering peatland and wetland environment, where ecological value depends heavily upon the connectivity between habitats.

The Commission should therefore examine whether the proposed infrastructure would interrupt ecological linkages between:

- bog and wetland habitats;
- lakes and feeding areas;
- roosting and foraging habitats;
- open habitats;
- watercourses;
- recovering vegetation; and
- surrounding wildlife habitats.

This issue assumes even greater importance when the proposed development is considered alongside existing and proposed infrastructure within the wider area.

13.6 Birds and bats

I am also concerned about the collision and displacement risks associated with the operation of eleven turbines with a maximum blade-tip height of approximately 200 metres.

Given their scale, the rotor-swept area will extend substantially above the existing landscape.

The assessment of bird and bat effects should therefore fully consider both the vertical and horizontal extent of the turbine operating envelope together with the movement patterns of species across the wider landscape.

The applicant's documentation recognises the need for buffers between turbines and treelines to minimise bat risk and proposes pre-construction monitoring together with ecological oversight.

However, I respectfully ask the Commission to consider whether the proposed mitigation measures are sufficiently robust to address uncertainty regarding long-term

bird and bat activity.

Monitoring should not merely confirm the assumptions made in the application. It should also be capable of identifying unforeseen impacts and triggering effective remedial measures where necessary.

13.7 Water quality and biodiversity are closely connected

Biodiversity cannot be considered separately from drainage, hydrology and water quality.

The applicant's own interaction assessment acknowledges that construction activities may generate noise capable of displacing species and that earthworks have the potential to cause secondary habitat degradation through deterioration in water quality.

This is particularly relevant within a landscape comprising lakes, wetlands, bogs and recovering peatland.

Changes to drainage patterns, sediment movement or water quality may adversely affect aquatic habitats and species even where construction does not directly enter a particular lake or watercourse.

Accordingly, I respectfully ask the Commission to consider biodiversity, peatland, hydrology and water quality as interconnected environmental issues rather than as separate chapters of the EIAR.

13.8 Biodiversity enhancement does not automatically compensate for development impacts

I note that the applicant proposes Biodiversity Enhancement Management Plan lands and associated habitat enhancement measures.

I welcome habitat enhancement in principle.

However, proposed enhancement measures should not automatically be regarded as offsetting or eliminating the ecological effects of the proposed development.

There is an important distinction between:

1. protecting an existing habitat;
2. enhancing habitat elsewhere;
3. replacing habitat that has been damaged; and
4. demonstrating that ecological function lost through development has genuinely been restored.

The Commission should therefore require clear evidence that proposed enhancement measures are additional, deliverable, appropriately located, adequately funded and capable of providing measurable ecological benefits.

Although the applicant's interaction assessment concludes that the Biodiversity Enhancement Management Plan is expected to have a positive effect on biodiversity, that conclusion should not diminish the need for a full assessment of the direct and indirect ecological effects of the development itself.

13.9 The precautionary principle and ecological uncertainty

There is inevitably uncertainty when predicting how wildlife will respond to a major development over several decades.

This is especially relevant within a landscape that is actively changing through peatland rehabilitation and ecological recovery.

The Commission should therefore exercise appropriate caution when relying upon assumptions based solely on the present distribution of species.

Recovering habitats may acquire increasing ecological value over time. Species may alter their use of the landscape as habitats continue to recover, while wetland areas may become increasingly important for breeding and feeding birds. Changes in vegetation and hydrology may also alter patterns of bat and invertebrate activity.

Accordingly, the absence of a species from a particular location at the present time should not be interpreted as demonstrating that the location lacks future ecological significance.

13.10 Cumulative ecological effects

Finally, the ecological effects of the proposed development should be assessed in combination with other existing, permitted and proposed developments within the region.

Eleven turbines and their associated infrastructure represent a substantial additional intervention within the landscape.

The cumulative assessment should therefore consider not merely whether individual developments give rise to significant effects in isolation, but whether multiple developments collectively reduce the availability, connectivity and quality of suitable habitat.

This is particularly important for wide-ranging species such as Hen Harrier and for species that regularly move between feeding, breeding and roosting locations.

Accordingly, I respectfully ask the Commission to ensure that cumulative ecological effects are assessed over an appropriate geographic area and time period, taking account of existing wind farms, proposed renewable energy developments, peatland rehabilitation, forestry, roads and other infrastructure.

13.10A Recovering peatlands as carbon sinks

I also ask the Commission to have regard to the wider environmental function of recovering peatlands.

As peatlands are rehabilitated through re-wetting and habitat restoration, they have the potential to contribute to carbon sequestration and long-term climate regulation. While the extent of carbon storage will vary depending on the condition and management of individual areas, the ongoing recovery of peatland represents an important environmental asset alongside its biodiversity and hydrological value.

In considering the proposed development, I respectfully submit that the Commission should have regard not only to the renewable energy benefits of the project, but also to the role of recovering peatland in supporting Ireland's climate objectives through the restoration of natural carbon sinks. These environmental functions should be considered alongside biodiversity, water quality and ecological connectivity when assessing the overall environmental balance of the proposed development. **13.10A Recovering peatlands as carbon sinks**

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13.11 Request for robust ecological safeguards

In light of the above, I respectfully ask the Commission to give particular consideration to:

- the ecological value of recovering and re-wetted peatland;
- the developing ecological value of wetland and lake habitats;
- breeding bird use of the site;
- Hen Harrier feeding and roosting habitat;
- potential displacement during the approximately 24-month construction period;
- bird and bat collision risk;
- habitat fragmentation;
- ecological connectivity;
- effects arising from changes in drainage and water quality;
- cumulative ecological effects; and
- whether proposed biodiversity enhancement measures genuinely compensate for, rather than simply accompany, the ecological impacts of the development.

I respectfully submit that the ecological value of this landscape should be assessed on the basis of its **current and emerging ecological function**, rather than principally by reference to its former industrial use.

The fact that peat extraction has previously occurred does not mean that the landscape no longer possesses ecological value. On the contrary, the ongoing rehabilitation of the peatlands presents an opportunity for continued ecological recovery, while the applicant's own assessments demonstrate that the area is already being used by breeding, feeding and roosting species.

The Commission should therefore be satisfied, on the basis of robust evidence and effective mitigation, that the proposed development will not undermine the continuing ecological recovery of the wider peatland and wetland landscape or give rise to unacceptable direct, indirect or cumulative effects on biodiversity.

14. Cumulative visual effects

The proposed development should not be assessed in isolation.

The applicant's LVIA includes a cumulative assessment of existing, consented and potential future wind energy developments. The proposed development would

introduce eleven additional turbines into a landscape that already contains wind energy infrastructure and other significant built elements.

The cumulative effects are particularly important when viewed from elevated locations and public recreational viewpoints.

Accordingly, the Commission should consider not merely whether individual turbines remain visually permeable, but whether the addition of a further large-scale wind energy development would materially alter the overall character, composition and experience of the landscape.

15. Electricity Grid Capacity, Dispatch-Down and the Effective Use of Renewable Energy

I also wish to raise a concern regarding the capacity of Ireland's electricity network to accommodate, transmit and effectively use additional renewable electricity generated by developments such as the proposed Littleton Wind Farm.

This issue has become particularly relevant in light of a report published by RTE on 28 July 2026, based on analysis by Wind Energy Ireland of EirGrid data. The report stated that, during the first six months of 2026, enough wind-generated electricity to power approximately 667,000 homes was not used because of limitations within the electricity network. Wind Energy Ireland estimated that approximately 15% of Ireland's lowest-cost electricity was effectively wasted because the existing grid could not accommodate all of the electricity generated.

The report also recorded EirGrid's position that, during the first half of 2026, 86.8% of wind generation was accepted onto the electricity system, while 13.2% was subject to "dispatch-down". EirGrid explains that renewable generation may be reduced because of surplus generation, system-security requirements or local network constraints.

This demonstrates that constructing additional renewable generation does not, of itself, guarantee that all of the electricity capable of being generated can actually be delivered to consumers. Effective use of renewable electricity also depends upon adequate transmission capacity, system flexibility, storage, interconnection and demand.

I recognise that EirGrid and ESB Networks are undertaking substantial investment to strengthen Ireland's electricity network. However, this reinforces the need for the Commission to consider the relationship between new generation projects and the infrastructure required to make effective use of that generation.

The applicant states that electricity generated by the proposed development will be exported to the national electricity grid via a proposed 110kV on-site substation. The application documentation also indicates that consent for the grid connection route itself is not sought as part of this application.

Accordingly, I respectfully ask the Commission to consider:

- the available transmission capacity when the development is expected to become operational;
- any existing or anticipated network constraints affecting the proposed connection;
- the extent to which electricity generated by the proposed turbines may be subject to dispatch-down or other operational constraints;
- whether the development has a firm and deliverable grid connection, together with any reinforcement works required to accommodate its full output;

- the timing of those reinforcement works in relation to the proposed operational date; and
- whether the environmental and public benefits claimed for the development adequately reflect the quantity of electricity that can realistically be delivered to consumers.

Installed Capacity and Delivered Electricity

I respectfully submit that it is important to distinguish between the theoretical generating capacity of the proposed turbines and the quantity of electricity that can actually be delivered to consumers.

A wind turbine can generate electricity only when wind conditions permit. Even then, the electricity produced must be accepted by the electricity system, transmitted through the available network and matched with demand, storage or interconnection. Where the network is constrained, generation may be reduced despite the turbines being capable of producing electricity.

The issue is therefore not whether wind energy can generate electricity. Rather, it is whether sufficient network capacity and system flexibility will exist to ensure that the electricity produced by additional wind farms can be effectively harvested and delivered.

Energy Storage and System Flexibility

Energy storage and system flexibility are also relevant considerations.

The Commission for Regulation of Utilities' *Flexibility Needs Assessment* recognises the importance of storage, flexible demand and other measures in enabling Ireland to accommodate increasing levels of renewable generation while maintaining security and affordability. Wind Energy Ireland has similarly identified grid reinforcement, energy storage and demand electrification as essential components of Ireland's energy transition.

I therefore respectfully ask the Commission to consider the proposed development not only in terms of its installed generating capacity, but also in the context of the infrastructure and system measures necessary to ensure that the electricity generated can be effectively utilised.

This is not an objection to renewable electricity generation. I fully recognise the importance of renewable energy in reducing greenhouse-gas emissions and Ireland's reliance on imported fossil fuels.

Rather, my concern is that the public and environmental benefits relied upon in support of this application should be assessed by reference to the quantity of electricity that can realistically be delivered to consumers over the operational lifetime of the project, rather than solely by reference to the turbines' theoretical maximum generating capacity.

16. Apparent Inconsistencies in Statutory Site Notices

I wish to draw the Commission's attention to an apparent inconsistency in the statutory site notices erected in connection with this application.

I have observed three site notices located along the Bog Road between Littleton and New Birmingham which display a different date from that shown on other site notices relating to the same application.

The application documentation identifies the site notice erection date as **10 June**

2026.

I appreciate that any discrepancy may simply arise from an administrative or printing error. However, because statutory site notices are a fundamental element of public participation in the planning process, I respectfully submit that the discrepancy should be verified.

Accordingly, I respectfully ask the Commission to establish:

1. the date on which the three notices were actually erected;
2. the date displayed on each notice;
3. whether the displayed dates comply with the applicable statutory requirements;
4. whether the discrepancy could have caused confusion regarding the public participation period; and
5. whether the applicant's site-notice arrangements complied in full with the relevant statutory requirements.

I make no allegation as to how the discrepancy arose. My concern is simply that members of the public should receive clear and accurate information concerning their opportunity to participate in the planning process.

I have retained photographic evidence of the notices and can provide it to the Commission if required.

17. Residential, Community and Public Amenity

My concerns are not based on any single issue considered in isolation.

They arise from the combined effect of:

- the elevated position of my future residence;
- its direct outlook towards the proposed turbines;
- the effect on an established summer sunset view;
- the recognised public amenity of the Reen Viewing Point;
- the developing recreational and tourism value of Derryvella Lake;
- the exceptional scale of the proposed turbines; and
- the cumulative transformation of the surrounding landscape.

The applicant's own LVIA recognises that local residents, elevated viewpoints and recreational receptors are among the most sensitive visual receptors.

The significance of the proposed development therefore arises not from any individual effect viewed in isolation, but from the combined effects on residential amenity, public visual amenity, recreation, landscape character and the wider environment.

I respectfully ask the Commission to assess these matters cumulatively as well as individually.

18. Conclusion

I recognise the importance of renewable energy and the need for Ireland to continue developing renewable electricity generation in support of national climate and energy objectives.

However, those objectives do not remove the requirement for every proposed development to be appropriately located and for its specific environmental, landscape

and residential effects to be fully assessed.

For the reasons set out in this observation, I respectfully submit that the proposed Littleton Wind Farm would give rise to unacceptable adverse effects on residential amenity, landscape character, visual amenity, public recreation and the wider environment.

Accordingly, I respectfully request that **An Coimisiún Pleanála refuse permission** for the proposed development.

In particular, I ask the Commission to give careful consideration to:

1. the visual effects on my elevated residential property, including its proximity to the proposed turbines and the impact on its established outlook;
2. whether the applicant's representative viewpoints and photomontages adequately assess elevated residential receptors;
3. the effects on the Reen Viewing Point and Derryvella Lake as recognised public visual and recreational amenities;
4. the cumulative landscape and visual effects of the proposed development;
5. construction traffic and associated impacts on the R639 and surrounding local roads;
6. peatland, drainage, hydrology and water-quality impacts;
7. biodiversity, ecological connectivity and the protection of recovering peatland habitats;
8. cumulative ecological effects, including impacts on Hen Harrier and other protected species;
9. the relationship between the proposed development and the capacity of the electricity network to accommodate and effectively utilise the electricity generated; and
10. the apparent inconsistencies in the statutory site notices and whether the statutory requirements have been fully satisfied.

If the Commission is not minded to refuse permission, I respectfully request that it require any additional assessment considered necessary and impose robust, enforceable conditions addressing residential amenity, landscape and visual impacts, construction management, traffic, noise, drainage, biodiversity protection, ecological monitoring and environmental management.

I respectfully ask that this observation, and all of the matters raised within it, be given full consideration in determining application **PAX92.324370**.

Signed: Rona Sorrell

Name: Rona Sorrell

Date: 11/08/2026