
Re: ACP Case reference: PAX92.324370 Littleton Wind Farm

From DevPlanSubs (Engineering and Major Projects) <devplansubs@esb.ie>

Date Tue 9/8/2026 4:06 PM

To SIDS <sids@pleanala.ie>

 1 attachment (1 MB)

PAX92.324370 ESB SUB LITTLETON WIND FARM-ISSUED.pdf;

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A Chara,

Electricity Supply Board (ESB), as a response to the above invitation now submit our observations on the Strategic Infrastructure Development (SID) Planning Application for the development of a Wind Farm comprising of 11 no. turbines (and all associated works) in the townlands of Longfordpass North, Longfordpass South, Leigh, Bawnreagh, Clonoura, Noard, Derryhogan, Derryvella, Ballybeg, Lanespark, Newhill and Killeen in County Tipperary, please see attached ESB's detailed observation document. If we can be of any further assistance, please do not hesitate in contacting the undersigned.

Best Regards,

Brid Reardon |Group Property Spatial Planner | Engineering and Major Projects| ESB
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27 Fitzwilliam Street Lower, Dublin 2, D02 KT92.

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From: SIDS <sids@pleanala.ie>

Sent: Thursday 3 September 2026 14:59

To: DevPlanSubs (Engineering and Major Projects) <devplansubs@esb.ie>

Subject: RE: ACP Case reference: PAX92.324370 Littleton Wind Farm

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Dear Brid,

I have been asked by An Coimisiún Pleanála to acknowledge receipt of your submission received in connection with the above-mentioned proposed development.



08 September 2026

Re: ESB's response to An Coimisiún Pleanála's invite to submit observations on the Strategic Infrastructure Development (SID) Planning Application for the development of a Wind Farm comprising of 11 no. turbines (and all associated works) in the townlands of Longfordpass North, Longfordpass South, Leigh, Bawnreagh, Clonoura, Noard, Derryhogan, Derryvella, Ballybeg, Lanespark, Newhill and Killeen in County Tipperary.

Planning Authority: An Coimisiún Pleanála (ACP)

ACP Case reference: PAX92.324370

Applicant: Littleton Wind Farm DAC

Developers: Bord na Móna (BnM) and SSE

Planning Consultants: Fehily Timoney and Company Ltd

Planning Website: <https://www.littletonwindfarmplanning.ie/>

A Chara,

Electricity Supply Board (ESB), 27 Lower Fitzwilliam Street, Dublin 2, has reviewed the SID planning application reference: PAX92.324370 by Littleton Wind Farm DAC for the proposed Littleton Wind Farm comprising of 11 no. turbines and all associated work, located in the townlands of Longfordpass North, Longfordpass South, Leigh, Bawnreagh, Clonoura, Noard, Derryhogan, Derryvella, Ballybeg, Lanespark, Newhill and Killeen in County Tipperary.

ESB supports the continued development of renewable energy infrastructure and recognises the important contribution that the proposed development can make towards Ireland's renewable energy and climate objectives. However, following a technical assessment of the application, ESB has identified a significant concern regarding the proposed location of **Turbine 4**.

ESB respectfully requests that the position of **Turbine 4** be reconsidered or relocated to an alternative position within the site.

The following sections set out our technical rationale to demonstrate how the location of **Turbine 4** would adversely affect the internal telecommunications links for ESB Networks. These telecommunications systems form a critical component of the national electricity infrastructure, necessary for the safe, secure and reliable operation of the electricity network.

1.1 ESB's Telecoms Network

ESB Networks Telecoms is the telecommunications division of ESB Networks and manages the largest private telecommunications network in the Republic of Ireland. Networks Telecoms provides mission critical services to both EirGrid and ESB for the operation of the electricity system through connection between assets and systems on the electricity grid. These connections require low latency, robust and resilient communications for fault detection, stability of the network, and to maintain safety.

Obstruction due to large structures, such as turbines, can significantly impact the strength and reliability of our Microwave Radio and Scada Polling Radio (SPR) networks. Radio links require a clear line of sight, with additional clearance in the area surrounding this line of sight. When obstructions occupy more than 40% of this space, significant degradation of the signal strength occurs, as signals get reflected and refracted, and

the link becomes unreliable or may fail entirely. It is important to protect these links and maintain their line of sight, to support our entire telecommunications network.

ESB Networks Telecoms has identified potential interference arising within our critical radio communications network due to the proposed development of Littleton Wind Farm, Co. Tipperary. A detailed analysis of the development on our behalf by Joint Radio Company has identified that **Turbine 4** would cause interference to one of our SCADA Polling Radio (SPR) links, which is critical for the operation of ESB Networks. Furthermore, a review by the SPR design team has concluded that there are currently no satisfactory internal mitigation solutions available.

1.2 SCADA Polling Radio (SPR) – Critical Infrastructure

SCADA, or Supervisory Control and Data Acquisition, is a network of devices that monitors and controls the substations used by Eirgrid's Transmission network and ESB Networks' Distribution System. The network relies on SCADA Polling Radio, owned by ESB Networks Telecoms, to transmit substation information to the Transmission System Operator (Eirgrid), and the Distribution System Operator (ESBN).

Therefore, the SPR network forms a critical component of the national electricity infrastructure, enabling real-time monitoring, fault detection, system control, and the safe and reliable operation of both the transmission and distribution networks. ESB Networks wishes to protect the integrity and reliability of its SPR infrastructure from developments that could compromise operational communications.

1.3 Affected ESN Links

SPR Links: JESBCE00 - JESBCE07 Thurles 110KV (Pole) to Gurteen Lower.

1.4 Supporting Analysis

The following image shows the Spreadsheet Analysis conducted by Joint Radio Company (JRC), which analyses the impact of each turbine against the **Thurles 110kV-Gurteen Lower** link that has been identified to be in close proximity to the development. As seen, the highlighted red results show significant diffraction will occur due to **Turbine 4**.

	Micrositing (m)	JESBCE00 to JESBCE07 Thurles 110KV (Pole) to Gurteen Lower WF			JESBCE00 to JESBCE01 Thurles 110KV (Pole) to Glengoolie 38KV		
		Reflection	Diffraction	Diffraction (MS + LB)	Reflection	Diffraction	Diffraction (MS + LB)
Littleton WF 1	50	1.0	1411.0	1346.0	1.0	3568.1	3503.1
Littleton WF 2	50	16.7	807.6	742.6	1.0	2980.1	2915.1
Littleton WF 3	50	6.5	220.2	155.2	1.0	2464.8	2399.8
Littleton WF 4	50	0.1	-68.4	-133.4	1.0	2056.8	1991.8
Littleton WF 5	50	13.3	515.5	450.5	1.0	1440.7	1375.7
Littleton WF 6	50	12.7	441.2	376.2	1.0	1701.3	1636.3
Littleton WF 7	50	1.0	1122.4	1057.4	36.4	843.4	778.4
Littleton WF 8	50	1.0	1234.6	1169.6	1.0	923.2	858.2
Littleton WF 9	50	1.0	4592.2	4527.2	1.0	2222.5	2157.5
Littleton WF 10	50	1.0	4719.9	4654.9	1.0	2230.8	2165.8
Littleton WF 11	50	1.0	4970.6	4905.6	1.0	2374.3	2309.3

Figure 1 Spreadsheet Analysis

Additionally, the cross-section analysis shows that a significant portion of the **1st Fresnel Zone** surrounding the relevant link is intersected with the proposed wind turbine (T4) diameter.

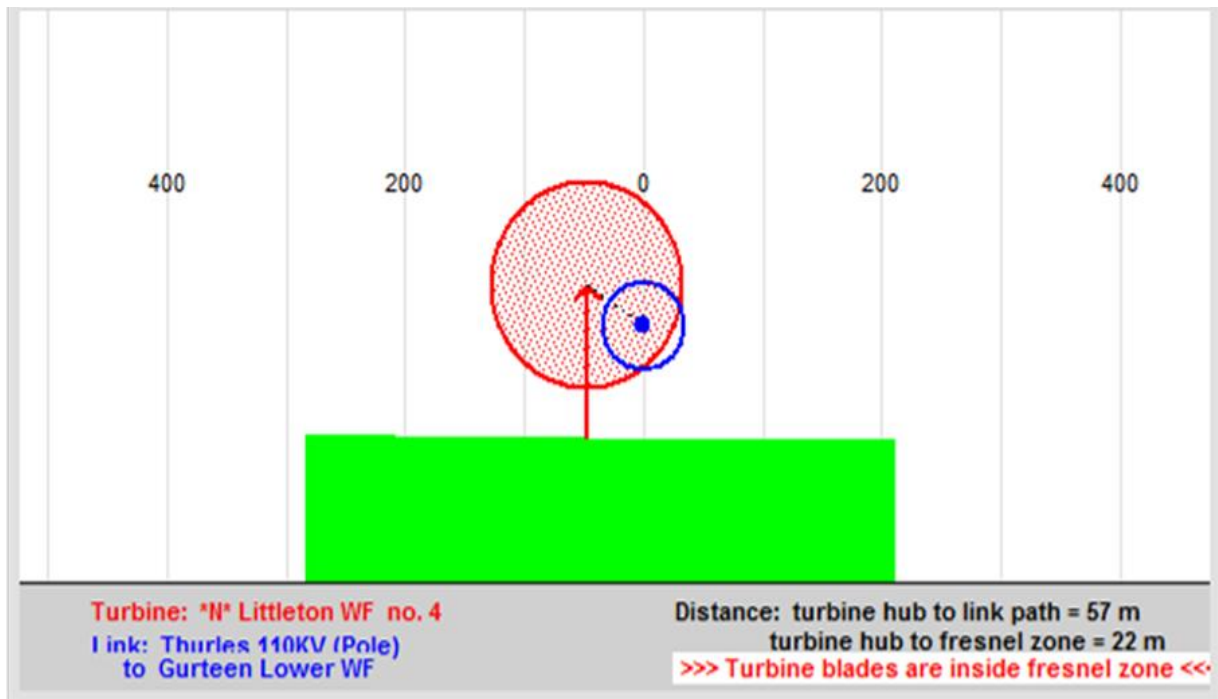


Figure 2 Cross Sectional Analysis

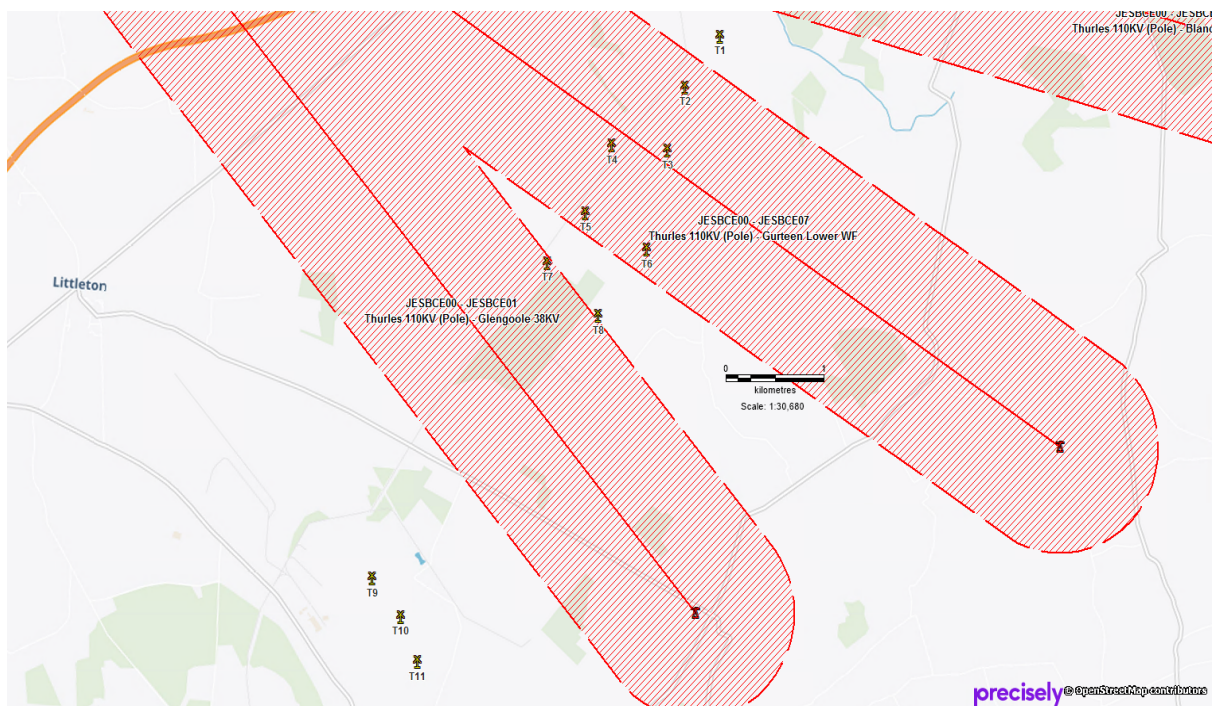


Figure 3 Site map of Proposed Turbines and Local SPR Radio Towers

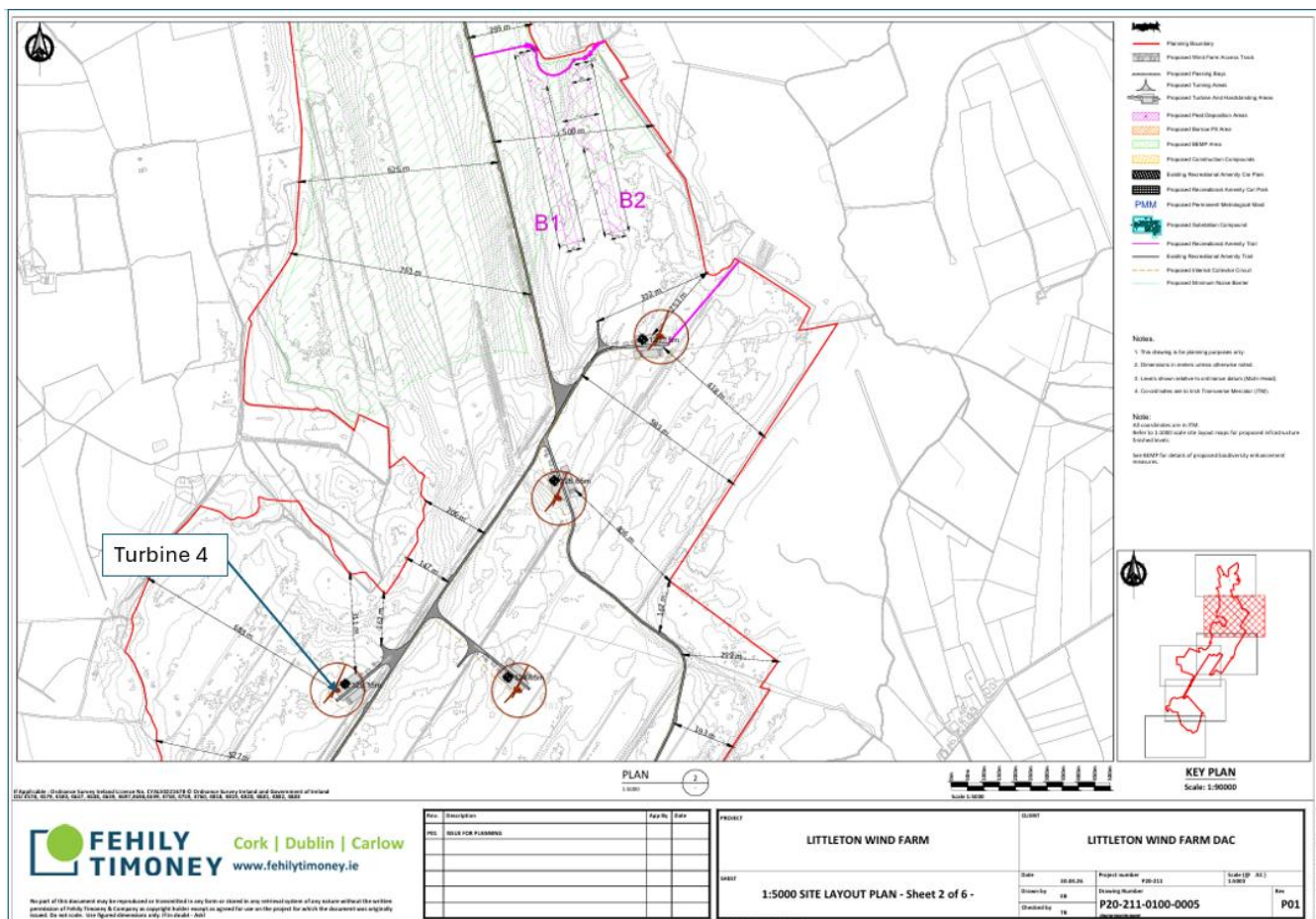


Figure 4 Turbine 4 Location Map

The detailed assessment of the proposed wind farm layout has concluded that:

- **Turbine 4** fails the telecoms interference assessment.
- The turbine is predicted to impact **SPR link JESBCE00 - JESBCE07**.
- The expected concern would be diffraction interference, due to the intrusion of the turbine into the Fresnel Clearance Zone of the radio path.
- JRC notes that reducing the turbine micro siting allowance would not resolve the issue because the turbine location itself obstructs the link in the current proposed coordinates.



1.5 Mitigation Review

The SPR Design team has reviewed the proposed development design and concluded that it is not currently possible to coordinate internal mitigation options. Specifically, the conclusion is that:

- There is no alternative high site available that may be used with sufficient certainty to replace the current link.
- Repointing the link has not been found to be a viable solution in this case.

As there are no mitigation solution identified to protect this radio link it is strongly recommended that the position of **Turbine 4** be reconsidered or relocated. Should the developer wish to relocate the turbine, JRC (on behalf of ESN) can provide an exclusion zone report identifying locations that would avoid interference with ESB Radio Links.

1.6 Conclusion

ESB welcome the opportunity to make observations on this planning application and reiterates its support for the proposed Littleton Wind Farm and the broader development of renewable energy infrastructure in Ireland.

However, based on the detailed technical assessment undertaken by Joint Radio Company (JRC) on behalf of ESB Networks Telecoms, it has been demonstrated that the proposed location of **Turbine 4** would adversely affect the operation of the SPR radio link **JESBCE00 - JESBCE07**. The assessment confirms that the turbine would intrude into the Fresnel Clearance Zone of the radio path, resulting in an unacceptable risk of diffraction interference and degradation of a critical telecommunications link.

The affected SPR network forms an essential component of the national electricity transmission and distribution infrastructure, facilitating real-time monitoring, fault detection, network control, protection systems and the safe and reliable operation of the electricity network. The integrity and resilience of this infrastructure must be maintained to ensure the continued security of electricity supply.

ESB Networks Telecoms has reviewed potential mitigation measures and concluded that no satisfactory technical mitigation is currently available. Alternative radio sites and link reconfiguration options have been assessed and determined not to be feasible in this instance.

In light of the above, ESB respectfully requests that An Coimisiún Pleanála require the relocation of **Turbine 4** to a position that does not interfere with the SPR radio network. This is a targeted and proportionate measure that would address the identified telecommunications constraint while allowing the remainder of the proposed wind farm development to proceed.

Should the applicant wish to identify an alternative location for **Turbine 4**, ESB Networks is willing to engage constructively with the developer and can provide telecommunications exclusion zone information to assist in determining a suitable alternative position.

In the interests of protecting essential national electricity infrastructure while facilitating the delivery of the wider renewable energy project, ESB considers that the relocation of **Turbine 4** is both necessary and reasonable.

ESB remains committed to working collaboratively with An Coimisiún Pleanála, Tipperary County Council and Littleton Wind Farm DAC to support the delivery of renewable energy, while ensuring the continued safe, secure and reliable operation of the national electricity network.



Energy for
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If we can be of any further assistance, please do not hesitate in contacting the undersigned.

Yours sincerely,

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