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Denise Kerr
Mid and East Antrim Local Planning Office
County Hall
182 Galgorm Road
Ballymena
BT42 1QF

11th September 2017

Re: Your reference LA02/2017/0594/F – Carnalbanagh windfarm, Antrim Hills

Dear Ms Kerr

Mountaineering Ireland* wishes to submit a comment on the above planning application.

1. Context

As the representative body for walkers and climbers on the island of Ireland, Mountaineering Ireland* has a particular interest in ensuring the sustainable use of Ireland's upland areas, incorporating mountains, hills, bogland, forests, cliffs and coastline. Mountaineering Ireland therefore represents a community of interest in this application drawn from Mid and East Antrim and also a much wider geographic area.

Mountaineering Ireland accepts that change is part of an evolving, living landscape, but such change needs to be planned and done in a well-considered and long-term way. While limited in their extent, the uplands are very significant elements in Ireland's landscape, providing defining geographic features, some of our most beautiful scenery and our largest areas of relatively wild land. It is imperative that in the management of landscape, balance is achieved between individual interest and the common and long-term good.

These key considerations have informed Mountaineering Ireland's vision for the future of Ireland's mountains and upland areas:

Mountaineering Ireland's vision is that Ireland's mountain landscapes will be valued and protected as environmental, cultural and recreational assets.

Mountaineering Ireland submits these comments from the context of supporting the principle of sustainable, renewable energy development. However, at a time of much change in factors affecting the energy sector, Mountaineering Ireland is concerned that there appears to be a singular drive to construct more onshore windfarms in Northern Ireland. Mountaineering Ireland would prefer to see investment in a diversity of renewable sources combined with a focus on reducing energy consumption. Improvements in grid capacity, better electricity storage and other technological developments will all enable greater efficiency to be achieved from Ireland's existing windfarm infrastructure, thereby reducing the pressure for new development.

Directors: P. Barron; F. Hackett; N. Hore; P. Kellagher; U. MacPherson; M. Maunsell; R. Millar,
P. O'Sullivan, I. Sorohan, D. Stelfox; Seamus Walsh; Simon Walsh.

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The proposal in question is for a seven-turbine windfarm, to the north east of Slemish Mountain. The development site is located within the Antrim Coast and Glens Area of Outstanding Natural Beauty (AONB).

2. Comments on the proposed windfarm

Mountaineering Ireland is aware that the Ulster Federation of Rambling Clubs (UFRC) has submitted an objection to the proposed development. Mountaineering Ireland is supportive of the UFRC objection for the following reasons:

2.1 Damage to recreational experiences and tourism

The proposed development would detract from the quality of the experience enjoyed by walkers and climbers, and by other visitors to this scenic area.

It is recognised within the guidance for landscape & Visual Impact assessment published by the Landscape Institute and Scottish Natural Heritage (SNH, 2017) that walkers and others engaged in outdoor recreation have a high sensitivity to changes in the landscape because their purpose is often to enjoy their surroundings.

This corroborates with Mountaineering Ireland's own findings. Consultation with members in 2016 identified '*peace and quiet*', '*natural beauty*', '*wildness*' and '*escape*' as the main attributes which make mountain experiences special (Mountaineering Ireland, 2017). The quality of the environment and the quality of the recreational user's experience are inextricably linked, with undeveloped natural landscapes providing the highest quality experiences. The relative lack of built artefacts in the upland landscape is a crucial element of the recreation experience.

This is also supported by research from Scotland; a survey recently published by the John Muir Trust found that an overwhelming 80% of Scottish people believe that Scotland's iconic '*Wild Land Areas*' should continue to be protected in the future from large-scale infrastructure, whilst the majority (55%) are '*less likely*' to visit scenic areas if they contain developments such as commercial windfarms, electricity transmission lines and super-quarries (JMT, 2017).

The visual impact of windfarms on people's experience of upland landscapes is exacerbated by the movement of turbine blades, which bring large scale mechanised movement to a naturally still environment. It is not just the turbines that present an issue, many Mountaineering Ireland members have also commented on how windfarm access roadways detract from the quality of the landscape, due to their large scale and visibility.

The beautiful scenery and the relatively unspoilt landscapes found in Ireland's mountain areas are irreplaceable. These areas are significant natural assets which should be wisely managed for societal benefit through appropriate planning. In addition to its adverse impact on the experience of recreational users and local residents, Mountaineering Ireland believes that the proposed development would be in contravention of Planning Policy Statement 16: Tourism, specifically TSM8, the objective of which is to safeguard tourism assets.

2.2 Landscape and visual impact

Mountaineering Ireland supports the UFRC's assertion that the proposed development would have an unacceptable adverse impact on the visual amenity and landscape character of the area, and therefore is contrary to Policy RE 1 of PPS18.

The proposed development site is part of the landscape setting of Slemish, the most prominent landmark in the area, which has deep historic and cultural associations and is a key attraction for visitors. The proposed windfarm would have an adverse visual impact on the views of Slemish, and as noted above it would interfere with the quality of the views enjoyed by those who climb to the summit of Slemish. This landscape is much valued for its scenic and perceptual qualities and would be highly sensitive to commercial-scale windfarm development.

Mountaineering Ireland notes that under the recent Regional Landscape Character Assessment, Carnalbanagh falls within RCLA 18 (Antrim Plateau and Glens), and that the RCLA states that:

'Landscape sensitivity studies may be required to determine the potential for the area to absorb further development of wind farms or single turbines, without adverse impacts on the character of the area and of the AONB'.

This is a crucial point, the potential of this area to absorb further windfarm development should be based on a capacity study, as is common practice to support local authority development plans in Scotland, see <http://www.snh.gov.uk/protecting-scotlands-nature/looking-after-landscapes/tools-and-techniques/landscape-capacity-and-sensitivity/>.

2.3 Not sympathetic to special character of the AONB

Mountaineering Ireland supports the UFRC position that the proposal is not of an appropriate design, siting and scale for the locality and is not sympathetic to the special character of the Antrim Coast and Glens AONB.

According to the UK's National Association for Areas of Outstanding Natural Beauty, an AONB is *'an outstanding landscape whose distinctive character and natural beauty are so precious that it is in the nation's interest to safeguard them.'*

Mountaineering Ireland recognises that there is not an embargo on windfarm development in AONBs, however, the Strategic Planning Policy Statement on Renewable Energy states that: *'Development proposals within AONBs must be sensitive to the distinctive special character of the area and the quality of their landscape, heritage and wildlife'* (DoE, 2015, paragraph 6.187).

The SPPS goes on to say that: *'A cautious approach for renewable energy development proposals will apply within designated landscapes which are of significant value, such as Areas of Outstanding Natural Beauty, and the Giant's Causeway and Causeway Coast World Heritage Site, and their wider settings. In such sensitive landscapes it may be difficult to accommodate renewable energy proposals, including wind turbines, without detriment to the region's cultural and natural heritage assets'* (paragraph 6.223). Both these statements originate from the Best Practice Guidance to accompany PPS18, published in 2009 (DoE, 2009b).

It is the position of Mountaineering Ireland, that given its scale, consisting of seven turbines with an overall height of 125 metres, that this is an industrial development, which due to its proposed location, would be severely injurious to the integrity of the Antrim Coast and Glens AONB, and therefore not compatible with the SPPS on Renewable Energy.

3. Conclusions

As an AONB, the landscape of the Antrim Coast and Glens is deemed to be so precious that it is the nation's interest to safeguard it. It has been shown in this submission that the proposed Carnalbanagh windfarm would adversely impact on both the visual amenity and landscape character of the area, and thereby impact negatively on the experience of recreational users. It would also affect the residential amenity enjoyed by local communities.

With any such application in an AONB a cautious approach is required; this is very pertinent given the scale of this proposal and its relatively prominent location within the Mid and East Antrim area. The need for a cautious approach is all the greater in the absence of a local development plan and landscape sensitivity and capacity study for the Council area.

Approval of this application would also undermine the significant public and community investment already made in tourism development in the Antrim Coast and Glens, and the economic value that recreation and tourism bring to the area. Both the recreational and tourist uses are highly sustainable and can function as strong economic generators on an ongoing basis without significant landscape degradation and with a much wider spread of return to the local and national community both in financial and employment terms.

Mountaineering Ireland trusts that you will take these views into consideration when deciding on this application.

Yours sincerely

Helen Lawless, Hillwalking
Access & Conservation Officer

*Mountaineering Ireland is the representative body for walkers and climbers on the island of Ireland. Mountaineering Ireland's mission is to represent and support the walkers and climbers of Ireland and to be a voice for the sustainable use of Ireland's mountains and hills and all the places (coastline, crags, forests) we use.

Mountaineering Ireland is recognised as the National Governing Body for the sport of mountaineering by both Sport Ireland and Sport Northern Ireland. The term mountaineering refers to a wide spectrum of activities that includes walking, rambling, hillwalking, rock and ice-climbing, bouldering and alpinism. Mountaineering Ireland has over 12,000 members, comprising 185 clubs and approximately 1400 individual members (July 2017).

4. References

DoE (2009a) *Planning Policy Statement 18: Renewable Energy*, published by Department of the Environment: https://www.planningni.gov.uk/index/policy/planning_statements/planning_policy_statement_18_renewable_energy.pdf.

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Mountaineering Ireland (2017) *Mountaineering Ireland's Vision for the Future of Ireland's Mountains and Upland Areas*, available online: <http://www.mountaineering.ie/aboutus/news/2017/?id=102>

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