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National Sports Campus
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Ms. Jane Curley
DOE Planning
Causeway Exchange
1-7 Bedford Street
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Northern Ireland

26th June 2015

**Re: Planning Application P/2015/0218/F – ABO Wind NI Ltd.
Gruggandoo Windfarm, Co. Down**

Dear Ms. Curley

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

1. Introduction and context

Mountaineering Ireland, as the representative body for walkers and climbers in Ireland, has a particular interest in the upland environment - hills, mountains, forests, bogland, sea cliffs and associated areas. 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. This is particularly the case in the Mourne Mountains.

People are drawn to wild and beautiful landscapes as a counterbalance to everyday life, for contact with nature, and for a physical challenge. The Mourne Mountains deliver a host of recreation opportunities, with associated economic and well-being benefits. Research conducted for the *Destination Mourne Mountains Tourism Management Plan 2013 – 2018* identified the core strengths of the destination as the scenery and landscape associated with the mountains, hills and sea and the easy accessibility of the mountains (NITB, 2013).

The current proliferation, and growing scale, of windfarm applications in Northern Ireland's upland areas is causing deep concern amongst Mountaineering Ireland 11,500 plus members across the island of Ireland. Northern Ireland has a very limited stock of undeveloped land, and this is being used up at an alarming rate. This kind of land has significant value in its own right – for example, recreation, flood alleviation and biodiversity value, but also carbon sequestration and storage potential (which will become increasingly important for Northern Ireland as climate change impacts increase in intensity).

It is Mountaineering Ireland's assertion that protecting the natural and undeveloped character of Northern Ireland's upland environment should be a key concern within the planning process. Mountaineering Ireland does not oppose all development in upland areas, rather it argues that development should be located where it does not destroy the essential character of the undeveloped landscape of the uplands and coast.

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The Mourne Mountains dominate the landscape of south County Down and consequently they hold a very special place in the hearts and minds of visitors and local residents. The Mourne Mountains are also held with great affection by the people of County Louth and the Cooley peninsula in particular. Mountaineering Ireland is of the strong opinion that this proposal is undesirable from a visual and long-term planning perspective. If planning permission is granted it would result in an unacceptable level of industrial development within a designated Area of Outstanding Natural Beauty (AONB).

A significant challenge lies ahead to maximise renewable energy capacity in Northern Ireland in a way that minimises the intrusiveness of renewable energy infrastructure, while ensuring that communities are not disadvantaged. While the dispersed pattern of wind turbines across Northern Ireland needs to be halted, it also exemplifies the lack of strategic guidance underpinning land use planning in Northern Ireland. This supports the growing call for cross-Departmental buy-in to an overarching land strategy (NILMTF, 2015). Such a strategy is required to optimise the use of land in Northern Ireland and facilitate a more joined-up approach to how our shared and precious land resource functions, appears and is utilised. This strategy contains some key principles that are particularly important in the consideration of renewable energy developments in sensitive landscape areas:

- Land should be recognised as multi-functional and opportunities for deriving multiple benefits should be encouraged and incentivised.
- Where land is highly suitable for a key primary function (for example food production, flood management, tourism and recreation, carbon storage), this function should be recognised in decision-making.
- Different ecosystems provide different benefits, though it should be recognised that they are not discrete entities existing in isolation from each other. It is important to recognise that decisions by individual land managers can have implications at a broader scale which can affect the delivery of those benefits.
- Decisions regarding land use and management can have dramatic impacts on landscape quality and character, including its cultural history and endowment; decisions must therefore respect the vulnerability of landscapes to change and the deep cultural sensitivities around land.
- The opportunities and threats posed by climate change must be central to decisions about how land is used in order to contribute effectively to climate change adaptation and mitigation.

2. Observations on this development

2.1 Visual intrusion

The proposed development site is located in the western Mourne Mountains, between Hilltown and Rostrevor. The location is within the Mourne AONB, an area designated for the protection and enhancement of its distinctive landscape and scenic beauty.

Twelve turbines, each with an overall height of up to 125 metres, would constitute a major discordant element in this upland landscape and be highly injurious to the visual amenity of this area. This injury to visual amenity is significantly exacerbated by the industrial nature of the proposed use as a power generating plant in an open moorland landscape. The incongruity and prominence of the windfarm would be intensified by the movement of the turbine blades in an otherwise still landscape. The visual injury the proposed development would bring is simply too great. It would lead to the industrialization of what is essentially a beautiful upland cultural landscape.

Mountaineering Ireland is concerned that the Landscape and Visual Impact Assessment (LVIA) for this development is deeply flawed.

Firstly, the selection of viewpoints was not in accordance with the criteria set out in paragraph 5.105 of the Environmental Statement. It is Mountaineering Ireland's strong assertion that the following viewpoints, all of which offer significant and extensive views and a high number of visual receptors, should have been assessed:

- Slieve Gullion mountain summit
- Slieve Foye mountain summit (Carlingford Mountains)
- Eagle Mountain summit

The proposed windfarm would be prominently visible from Slieve Foye directly to the south of the site. It would also be intrusively visible from the Slieve Gullion AONB to the west, and would seriously diminish the amenity value of both those landscapes. An assessment should be carried out from these three key viewpoints so as to enable the planners to make a more informed decision on this application.

With regard to the visual impact assessment requested for Slieve Foye, Mountaineering Ireland draws the planner's attention to An Bord Pleanála's decision in May 2013 to refuse planning permission for a five-turbine windfarm at Rockmarshall in the Cooley Mountains, as it would damage the visual amenity of the area and interfere with the character of the landscape. Given the transboundary considerations required under the Supplementary Planning Guidance to PPS18, approval of this application would undermine the protection of the sensitive and historic Cooley landscape in An Bord Pleanála's decision.

Mountaineering Ireland believes that the anticipated *slight effect* on visual amenity for Viewpoint 19 Slieve Bearnagh Summit is an incorrect assessment. Gruggandoo is clearly visible from the top of Bearnagh. The assessment fails to factor in the high sensitivity of the views on Bearnagh summit to intrusions in the landscape (see Table B1 in Appendix 5.1 *LVIA Assessment Thresholds and Criteria*). It appears there may have been over-reliance on the distances quoted in Table 5.34, which is taken from PPS18 (*Planning Policy Statement 18 'Renewable Energy'*). These are general guidelines; paragraph 1.3.20 lists other factors which influence visual impact, including the number and size of turbines and landscape character.

The assessment from other viewpoints, for example Cloghmore Stone (21) and Ballyonan Forest Viewing Point (26) may be similarly under-estimated.

The assessment concludes that the most significant visual impact is within 3km of the proposed development, to the south of Hilltown between Yellow Road to the west and the Leitrim Valley to the east. While Mountaineering Ireland is in no doubt that the development would have a significant, indeed overbearing, impact on this immediate landscape, the conclusion (5.190) that the majority of the Mourne AONB would experience no impact from this development remains in question, pending the Eagle Mountain viewpoint assessment, and a review of the Slieve Bearnagh and Cloghmore Stone assessments.

The development site is within the Slieve Roosley Landscape Character Area (LCA72). *Wind Energy Development in Northern Ireland's Landscapes* (2010), the Strategic Planning Guidance which accompanies PPS18, identified the overall sensitivity rating for wind energy development in the Slieve Roosley LCA as High, noting that

...the narrowness of the upland ridges, their wild character, and their wide visibility (from the valleys and surrounding landscapes) make them highly sensitive to wind energy development.

Table 5.22 of the Environmental Statement addressed the Landscape Sensitivity of LCAs within the study area as defined in the Strategic Planning Guidance. This assessment shows that three of the five LCAs in the main study area have a High Sensitivity rating to wind energy development, with High to Medium Sensitivity in the remaining two.

The sensitivity description for High Sensitivity is:

Landscape is very vulnerable to change and would be adversely affected by wind energy development, which would result in a significant change in landscape and visual characteristics and values.

PPS 18 highlights particular considerations required with regard to wind energy developments within AONBs:

1.3.19 - This is not to suggest that areas valued for their particular landscape and/or nature conservation interest will have to be sacrificed (in the interest of promoting renewable energy)

1.3.23 - A cautious approach is necessary in relation to those landscapes which are of designated significant value, such as Areas of Outstanding Natural Beauty, and the Giant's Causeway World Heritage Site, and their wider settings. Here, it may be difficult to accommodate wind turbines without detriment to the Region's cultural and natural heritage assets.

It is clear that the Mourne landscape is very vulnerable to change and would be adversely affected by development of the Gruggandoo windfarm. Mountaineering Ireland is strongly of the view that the sudden intrusion of this industrial use in a scenic upland area would impose an unacceptable rate of landscape change, and would be contrary to Policy RE1 of PPS18 which requires that renewable energy developments will not result in an unacceptable adverse impact on visual amenity and landscape character.

2.2 Loss of undeveloped upland landscape

Mountaineering Ireland's second major objection to the proposal is the continuing erosion to Northern Ireland's small remaining national stock of undeveloped upland landscape.

Northern Ireland has a very limited stock of relatively wild and undeveloped natural landscape; mountains, moorlands and heaths cover about 12% of Northern Ireland's land surface, compared with the UK average of 18% (UK NEA, 2011, p106). The character of much of this 12% has already been altered by development. This vital resource is being lost at an unprecedented rate and in an unsustainable manner.

Mountaineering Ireland disputes the following conclusions within the Environmental Statement:

5.125 states that there will be no direct loss of any landscape character element in the Slieve Roosley Landscape Character Area (LCA). It is simply impossible that the creation of over 6km of new internal access road (to a width of 4.5 – 5m), and the imposition of 12 wind turbines reaching to a height of 125m, each anchored by a substantial reinforced concrete foundation, could not result in a loss of landscape character elements.

5.119 argues that the introduction of wind turbines at Gruggandoo would not irreversibly or permanently alter the character of the landscape, as the landscape would be easily returned to its existing condition should the windfarm cease operations, with only negligible effects on visual amenity and landscape character. Again this is impossible; much of the development site is open moorland and bogland; it is not possible to re-create a textured, natural landscape. The applicants should be asked to provide examples of where this has been achieved in a similar environment. Mountaineering Ireland therefore urges extreme caution to avoid negative impact on the unique landscape character of the area – an impact that Mountaineering Ireland very much doubts would ever be reversed without serious detrimental negative impacts.

It appears there has been no consideration of how the proposed development would affect the Gruggandoo area of Special Scientific Interest (ASSI 368) which is designated on account of its earth science interest. Gruggandoo is the only location where the cone sheet which surrounds the Mourne can be seen at the surface (as an igneous rock called granophyre). This site is important to the story of the formation of the Mourne landscape. While the applicants state (5.98) that the ASSI falls outside the site boundaries, they fail to mention that it adjoins the site. The geological significance of Gruggandoo is underlined by a recent scientific paper identifying the presence of minerals not previously described in Northern Ireland at Wee Roosley and Gruggandoo (Moles & Tindle, 2012). It is Mountaineering Ireland's assertion that the proposed development should be carefully assessed for its potential to adversely impact upon this important geological site.

Mountaineering Ireland is extremely concerned that if the proposed Gruggandoo windfarm were to go ahead, this would open the way for further intrusive development in the Mournes, undermining the quality of this unique landscape, detracting from the experience for visitors to the area, and weakening the identity of Mourne as an Area of Outstanding Natural Beauty. It should be incumbent upon planning authorities to have, in the interests of proper planning and sustainable development of their administrative areas, preference for less intrusive and more reversible uses of the wild lands in their jurisdiction.

Mountaineering Ireland challenges the apparent presumption that remote and undeveloped landscapes are appropriate locations for industrial-scale renewable energy developments. Should this development not be centred in industrial zones, closer to demand centres? As highlighted recently by Professor Anthony Trewavas in Scotland, the renewable energy sector draws heavily on non-renewable natural resources and ultimately comes at a high cost with benefits to very few people (Trewavas, 2015).

The small area of undeveloped upland landscape or wild land which remains in Northern Ireland is a priceless asset, the enjoyment of which for recreational or other sustainable uses, is vital to the physical, mental, recreational, emotional and spiritual well-being of the people of Northern Ireland as a whole. This natural capital should not be squandered by the location of industrial and other inappropriate and unsympathetic uses in those vulnerable and precious places for the private benefit of a small number of developers. This in itself should be a key consideration in the proper planning and sustainable development of south County Down – the loss of such special areas is a loss that impacts on all.

Using this particular upland area creates a conflict, where the land may be better used for other purposes – for example, agriculture, recreation, flood alleviation, space for nature and, perhaps most significantly, carbon sequestration and storage. Using this space for development of a windfarm would negate the land's potential to deliver these other important services to society.

2.3 Damage to recreational experience

The Mourne Mountains provide a vital recreation space for the population of Northern Ireland with the relatively natural and undeveloped character of the landscape delivering both physical and spiritual renewal. NITB research shows that 80% of visits are from within Northern Ireland, with Belfast, Antrim and Down dominating (2013).

It is a central contention of the Tourism Impact Assessment (Chapter 14 of Environmental Statement) that due to its peripheral location the proposed wind farm at Gruggandoo would not have a significant impact on tourism activity in the Mournes. This assumption fails to appreciate the impact which this windfarm would have on the experience of walkers and climbers on popular peaks such as Slieve Gullion, on Eagle Mountain and Shanlieve and on the Cooley Mountains to the south.

Neither does it consider that the construction of a large windfarm within the Mourne AONB could create a precedent for further industrial developments with the AONB, and therefore it could undermine future tourism activity and more importantly impact negatively on local sustainable tourism investment and recreational infrastructure.

Significantly, the Tourism Impact Assessment has failed to identify the strength of the Rostrevor Mountain Bike Trails as a tourism asset. The trails, which are within Kilbroney Park and Rostrevor Forest, include two challenging courses that total 46km. Part of the trail network is within 4km of the development site, and it is clear that the turbines would be visible to mountain-bikers from many points. Since these trails opened in July 2013 Rostrevor has firmly established itself on the UK and European bike scene with visitors coming from all over Europe to test themselves on the course. The 2014 Rostrevor Mountainbike Festival attracted almost 500 competitors. A similar event, but road biking, in June 2015 attracted almost 1,000 people and used the route from Rostrevor to Newcastle via Hilltown. In August 2015, the Etape Mourne Cycle Race will attract many thousands of people to the area. The

110 km circuit will include sections from Rostrevor to Hilltown passing close to the proposed location of the wind farm development. Clearly therefore, the area is used extensively by recreational users and the proposed development would negatively impact on the experience of such users, both locals and visitors to the area.

The assertion (14.47) that given the remoteness of the Gruggandoo site, it is most likely that only Free Independent Travellers might find themselves close to the wind farm is also mistaken. Tollymore National Outdoor Centre regularly uses these hills for navigation training as the terrain is quite different from other areas of the Mourne and it is easily accessible. Other outdoor centres use the small crags near the top of Wee Roosley for rockclimbing.

The table summarising the key features within the study area (5.92) shows a poor understanding of how people engage with the Mourne landscape. Hillwalking, as distinct from trail walking, is about the exploration of open mountain landscapes, it is in essence a spatial activity rather than one which relies on recognised tourism facilities, or defined or marked walks such as the Mourne Way. Hillwalking is a significant activity right across the mountains of the Mourne AONB. The inclusion of so many low-level tourism and amenity facilities, and so few mountain summits, has skewed the assessment of LVIA Effects on Tourism and Visitor Destinations (Table 5.33) and the Tourism Impact Assessment.

Despite the research quoted in paragraphs 5.152 and 5.153, Mountaineering Ireland can say with certainty that the industrialisation of this landscape through the imposition of a very visible windfarm would detract from the quality of the recreation experience currently enjoyed in the Mourne Mountains.

This assertion is supported by research from Scotland which provides clear evidence that mountain-goers do not want to pursue their activity, and spend their money, in areas they regard as spoiled by industrial-scale windfarms. They are changing their behaviour to avoid such areas (MCoS, 2014).

When compared with wind energy development, the recreational and tourist uses of the Mourne landscape 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.

It should also be noted that the Mourne area is highly regarded in a European context for the linkage between the recreational experience of visitors to the area and the outstanding natural beauty of the area. In recognition of this a major European conference 'Nature and Sports Euro' meet 2015' will take place in Newcastle, County Down, from the 30th September to the 2nd October 2015. The conference is being organised jointly by Newry, Mourne & Down District Council and Sport Northern Ireland in partnership with the European Network of Outdoor Sports. It is expected that the event will attract over 300 delegates from across Ireland, the UK and Europe. The conference will provide a platform for delegates to learn about examples of best practice in outdoor recreation from both a European and local perspective and share their experiences with local providers. There are two key themes throughout the conference - increasing participation for all in outdoor sports, and maximising the economic benefits that outdoor sports bring to a region. The event has been supported locally by Tourism NI, Tourism Ireland, the Northern Ireland Environment Agency, Mourne Heritage Trust and the National Trust. At an international level the work has been led by the French Ministry of Sport in partnership with Sport Northern Ireland and other members of the European Network of Outdoor Sport (ENOS). The event will provide an opportunity to share experiences of developing outdoor recreation in the Mourne, and showcase the wonderful natural resources that the people of Northern Ireland are so proud of while learning from others across Europe. This conference clearly places outdoor recreation at the heart of the future sustainable development of the Mourne. The granting of the proposed wind farm development would seriously undermine all current efforts to further develop a culture of dynamic sustainable outdoor recreation with the Mourne landscape at its core.

3. Conclusions

The proposed Gruggandoo windfarm is of grave concern to Mountaineering Ireland, due to its scale, its location within the Mourne AONB, and the fact that it is the first planning application for a significant windfarm in this area. These concerns are exacerbated by the extremely low level of public awareness of this proposal which Mountaineering Ireland found when consulting with members about the application; including many members who live in south Down. The deficiencies identified in both the Landscape and Visual Impact Assessment and the Tourism Impact Assessment also sound a warning.

Approval of this application would result in an unacceptable impact in a scenic upland landscape. It would change the character of the area, leading to upland industrialization and wind turbines that would dominate the sounding region. Approval of this application would also undermine the current and future economic value that recreation and tourism bring to the Mourne. It would be counterproductive to policy of Newry, Mourne & Down District Council and others to further develop a culture of dynamic sustainable outdoor recreation with the Mourne landscape at its core.

Mountaineering Ireland maintains that the future sustainable development of the Mourne AONB should embrace a measured evolution of its heritage, recreation, tourism, forestry, water supply and agricultural functions. The cultural value of the Mourne AONB, as a living farmed landscape, coupled with the potential to continue to develop sustainable outdoor recreation in harmony with the farming community, is the future for the Mourne AONB.

Most importantly, the continued loss, and the actual rate of loss, of Northern Ireland's stock of undeveloped land must be examined and carefully reviewed. The remaining undeveloped areas, like the proposed location of Gruggandoo windfarm, need to be carefully considered in order to protect this vital diminishing resource and ensure that it is used in a sustainable way.

Mountaineering Ireland trusts that you will take these views into consideration when deciding on this application. Mountaineering Ireland is happy to expand on or clarify any matters contained in this submission.

Yours sincerely



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***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 the Irish Sports Council 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 11,550 members, comprising 174 clubs and approximately 1400 individual members (October 2014).

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