



Irish Sport HQ
National Sports Campus
Blanchardstown
Dublin 15

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

25th March 2015

Re: Case reference: PL05.PA0040 – Carrickaduff Windfarm, Co. Donegal

Dear Sir/Madam

Mountaineering Ireland* wishes to submit a comment on the above application which is being dealt with under the Strategic Infrastructure Development process. The proposed development comprises the construction of 49 wind turbines, two permanent meteorological masts, two 110kv electrical substations and all associated works, at Meenbog and other townlands, County Donegal.

1. Introduction and context

Mountaineering Ireland, as the recognised national governing body for walkers and climbers on the island of 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.

People are drawn to wild and beautiful landscapes as a counterbalance to everyday life, for contact with nature, and for a physical challenge. Ireland's upland areas deliver a host of recreation opportunities, with associated economic and well-being benefits. The uplands are considered by many to be the great 'green gym' and are used as such by hundreds of thousands of people annually.

Ireland has a very limited stock of undeveloped land, and we are using this up at an alarming rate. Large scale wind farm development uses up a landscape that belongs to all of us, for the benefit of a few. It is Mountaineering Ireland's assertion that protecting the natural and undeveloped character of 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, be that upland areas or wild coastline.

Directors: P. Barron; D. Batt; F. Bradley; N. Hore; U. MacPherson; M. McKeever;
R. Millar; R. Ó Conchúir; P. O'Sullivan; I. Sorohan; D. Stelfox; U. Vejsbjerg; S. Walsh.
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This observation is also submitted from the context of supporting the principle of sustainable, renewable energy developments within Ireland. Mountaineering Ireland believes that a national policy of energy conservation, coupled with a diversity of renewable sources, particularly off-shore stations and supported, community-scale schemes that deliver power directly, provide a more effective approach to meeting future energy needs.

Mountaineering Ireland is acutely aware of the current status of the wind energy sector in Ireland and the key role that it can play. As an all-island body, Mountaineering Ireland is also fully aware of the contextual need for wind energy and the value that properly developed wind energy projects can generate, especially in more remote rural areas. In order for this to happen such projects need to be built on effective community engagement and this is paramount to Mountaineering Ireland's approach to such developments.

The current proliferation, and growing scale, of windfarm applications in Ireland's upland areas is causing deep concern amongst Mountaineering Ireland members. These concerns are exacerbated by the absence of a national policy to protect upland landscapes, and the knowledge that Ireland's electricity generation capacity is already well beyond peak demand (Deane, 2015). The lack of integration at a national policy level has inhibited the transition and transformation of Ireland's energy systems away from fossil fuels.

Mountaineering Ireland welcomes the current initiative by the Department of Communications, Energy & Natural Resources to take a national strategic approach to the identification of suitable areas for large-scale electricity generation. Such an approach is urgently required. Without this, there is grave risk that Ireland will destroy the character of its rural and upland landscapes through ad-hoc developments for the commercial gain of a minority, with consequent long-term loss in terms of our national economy and the well-being of our people.

Mountaineering Ireland is of the strong opinion that this development is undesirable from a visual and long-term planning perspective. It is the belief of Mountaineering Ireland that the proposal would result in an unacceptable level of industrial development in this scenic rural area. Mountaineering Ireland is justifiably opposed to the industrialisation of Ireland's upland areas and has been alarmed with the scale of such developments over the past 15 years. Moreover, this development is not justifiable from either a demand or a policy perspective.

2. Observations on the proposed development

2.1 Visual intrusion

The proposed wind farm is located in a remote upland setting to the east of the Blue Stack Mountains and the Barnesmore Gap, close to the border with Co. Tyrone.

The scale of this development is of great concern. The installation of 49 turbines, each with an overall height of up to 156.5 metres, would constitute a very significant change in land use, and be highly injurious to the visual amenity of this area. The incongruity and prominence of the wind farm would be intensified by the movement of the turbine blades in an otherwise still landscape.

The visual intrusion of wind farms in undeveloped and lightly developed landscapes is compounded by the access roads, sub-stations and other infrastructure that accompany such wind turbines. The road widening and upgrading required to transport the turbines to the Carrickaduff site would bring visual and physical disruption to an established and appropriate minor road network. The introduction of out-of-scale roads and junctions would significantly and irrevocably alter the grain of the local landscape.

There is also likely to be injury to the residential amenities of people living in the area by reason of the over-dominant visual intrusion of the proposed turbines, their movement and noise.

The sudden intrusion of this industrial use in a scenic upland area would impose an unacceptable rate of landscape change. The future sustainable development of the area should embrace a measured evolution of its heritage, recreation, forestry and agricultural functions. The visual injury the proposed development would bring is simply too great, and it is the opinion of Mountaineering Ireland that this type of development is therefore unwarranted and unnecessary.

2.2 Loss of undeveloped upland landscape

Mountaineering Ireland's second major objection to the proposal concerns the continuing loss to Ireland's small remaining national stock of undeveloped upland landscape, of which the subject site forms a small but significant part. While the Environmental Impact Statement (EIS) describes the landscape in the study area as 'largely modified' in character, it is notable that the EIS Non-technical Summary states that only 47% of the development site is under forestry. Even if this is an error (65% is used elsewhere in the report), there is no comparison between the landscape modification that arises from the establishment of conifer plantation and the imposition of a power generating plant of the scale proposed. A landscape changed through agriculture and forestry is modified by natural elements, whereas in this application the main elements are non-natural and industrial. It should be incumbent upon planning authorities to have, in the interests of the proper planning and sustainable development of their administrative areas, preference for less intrusive and more reversible uses of the wild lands within their jurisdiction.

In the context of the Department of Environment's Wind Energy Planning Guidelines (2006), the landscape characteristics of the development site relate mainly to the Mountain Moorland type. Mountaineering Ireland challenges the apparent presumption within the guidelines that Mountain Moorland is suited to larger wind farm developments, of any height, whereas industrial landscapes are considered to have minimal tolerance of this type of development. This fails to recognise that firstly, wind farms are industrial developments and secondly, the very finite nature of Ireland's Mountain Moorland landscape resource. Furthermore, it is critically important to point out that the sheer scale of the proposed Carrickaduff wind farm was never anticipated nor envisaged when these guidelines were developed. The existing guidelines do not provide an adequate framework in considering this application.

Given that the EIS (11.8.2.2) concludes that 'the proposed development will have an overall Moderate effect on the landscape character of the study area', Mountaineering Ireland is surprised that the developers have seen fit to proceed with an application.

Cognisance must be taken by developers and planning authorities of the effects of development on the landscape, not only within development sites, but also on the surrounding landscapes and environments. Mountaineering Ireland notes that the site in question is made up of both private and State-owned land (Coillte forestry), however the constitution recognises that property rights are not absolute and should be

balanced with the common good. Actions by a landowner (public or private) which have adverse impacts on the landscape as a whole outside their property must be seen as being contrary to the long-term interests of society and should be subject to planning restriction.

The small area of undeveloped upland landscape or wild land which remains in Ireland is a priceless national 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 nation as a whole. This important national resource 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.

2.3 Damage to tourist and recreational experience

The Blue Stack Mountains provide a vital recreation space for local residents, domestic visitors and overseas tourists, with the wild and undeveloped character of the landscape delivering both physical and spiritual renewal. The area is renowned nationally and internationally as a hillwalking and mountaineering destination of note.

The landscape of Donegal is the key asset underpinning tourism in the county. The importance of walking tourism to this area was demonstrated by Fáilte Ireland's designation of Donegal town as one of Ireland's first *Walkers Welcome* hubs. Fáilte Ireland research shows that in 2011 over 740,000 overseas visitors to Ireland claimed to have gone hiking or cross-country walking spending approximately €649m (Fáilte Ireland, 2014).

The significance of the Barnesmore Gap as a gateway to and from south Donegal is under-acknowledged in the EIS, and the assessment of the impact of the turbines on the protected view across Lough Mourne as 'slight' is in our opinion questionable. The visibility of 16 turbines will most certainly detract from this iconic view. People looking at this vista will see turbines, which changes the view from being one of a scenic rural landscape, thus altering the person's overall impression of the landscape. There is very considerable association, both locally and nationally, with the area as a cultural landscape. This cultural landscape will be irreversibly impacted upon if the proposal is granted planning.

The presentation of the photo montages at such a small size in the EIS report, with some images appearing to be distorted, is unusual and not helpful to the reader.

Chapter 5 of the EIS, includes a brief section on amenities and community facilities (5.2.5.3) and Map 11.2 depicts designated trails within a 20km radius of the proposed development site. This scant acknowledgment of the area's offering for walkers fails completely in understanding the nature of walking as a recreation activity and the various levels at which the activity takes place. Firstly, most walking activity takes place informally, and in rural areas such as this site local residents will regularly walk along quiet country roads and on forest tracks. Secondly, hillwalking, as distinct to trail walking, is about the exploration of open mountain landscapes, it is in essence a spatial activity rather than one which relies on defined or marked routes. Trail walking is but a minor segment within the spectrum of walking activity which takes place in the vicinity of the development site, the EIS therefore has failed to capture the importance of the area to walkers.

Chapter 5 also presents findings regarding the attitude of tourists and the general public to windfarms. As the representative body for Ireland's largest recreation user group, walkers, Mountaineering Ireland can say with certainty that the industrialisation of this landscape through the imposition of a very visible wind farm

will detract from the quality of the recreation experience currently enjoyed in the Blue Stack Mountains, around the Barnesmore Gap, and in the study area itself. This is likely to have longer term negative economic and social consequences on the local economy and the social fabric of the area.

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 wind farms. They are changing their behaviour to avoid such areas (MCoS, 2014).

With regard to the section in Chapter 5 on the employment potential associated with this windfarm, the maintenance of wind turbines is skilled work and therefore unlikely to provide employment for local residents.

2.4 Impact on wildlife and habitats

The importance of upland areas for biodiversity conservation is unquestionable, with numerous upland habitat types listed under Annex I of the EU Habitats Directive and many rare and threatened bird and animal species being associated with these habitats (Perrin et al, 2014).

There are a number of Special Areas of Conservation (SACs) in the vicinity of the proposed developed site, including: the Dunragh Loughs/Pettigo Plateau SAC (001125) noted for its good quality blanket bog and wet heath; the extensive Finn Valley SAC (002301); the Lough Eske and Ardnamona Wood SAC (000163) and the nearby Croaghonagh Bog (000129), designated primarily for the quality of its active blanket bog habitat.

Approximately 65% of the study area for the Carrickaduff wind farm EIS is taken up by forestry habitats and almost 18% by upland blanket bog. This provides ideal habitat for Hen Harriers (listed as an Annex 1 species under the EU Birds Directive (2009/147/EC). Hen Harriers were reported as breeding at this location during the 2007-2011 Bird Atlas, and breeding was confirmed in the vicinity of the development following a number of national surveys (Ruddock *et al.*, 2012).

The EIS makes no reference to Red Grouse, yet there have been sightings reported very close to the development site. Red Grouse is an Annex II species which is sensitive to disturbance and whose declining numbers are of concern.

It is undeniable that an industrial development of this scale, requiring extensive excavation and disturbance, will result in the loss and displacement of many less iconic plant and animal species. While they may not merit the higher legal protection, they are integral to a biotic community which is already under pressure from habitat loss, invasive species and the effects of climate change, and upon which all human life depends.

The development site includes Active Blanket Bog, an Annex I priority habitat. The EIS (table 6.55) shows that 2.95 hectares of this priority habitat will be permanently lost. In light of the European Court of Justice 2013 decision on the Galway City outer bypass, regarding the loss of 1.47 hectares of Annex I habitat, how could this be acceptable (Curia, 2013)?

The cumulative loss of upland habitats is having an unprecedented impact on Ireland's wildlife. Upland breeding bird numbers are in dramatic decline and wild bog flora is being lost at an alarming rate. Given that this proposal is under the Strategic Infrastructure Development process it is important that full cognisance is taken of this. This will ensure that the proposal is not taken in isolation but rather viewed in terms of habitat and species loss at a national and cross-border scale.

3. Conclusion

The scale of this application, in terms of both the height and the number of turbines, is of great concern to Mountaineering Ireland. Approval of this application would result in an unacceptable impact, industrialising and dominating a scenic rural landscape, as well as undermining the current and future economic value that recreation and tourism bring to County Donegal. 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. The continued loss of Ireland's national stock of undeveloped land must be slowed. We need to protect this vital resource and ensure that it is used in a sustainable way.

In light of the fact that Ireland's current electricity generation capacity is acknowledged to be well beyond peak demand, and that work is underway to take a strategic approach to the identification of suitable areas for such large-scale electricity generation, the Carrickaduff application appears both unnecessary and premature.

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 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).

References

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