



Irish Sport HQ
National Sports Campus
Blanchardstown
Dublin 15, Ireland

Tel +353(0)1 625 1115
Email: info@mountaineering.ie

Planning Department,
Wicklow County Council,
County Buildings,
Station Rd,
Wicklow Town,
Co. Wicklow

8th August 2017

Re: Planning Application 17814 - ABO Wind Ireland Ltd. - Ballymanus Windfarm

Dear Sir/Madam

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

1. Introduction and context

As the national 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 County Wicklow 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. This is particularly the case in County Wicklow. It is imperative that in the management of landscape, balance is achieved between individual interest and the common and long-term good. This informs 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.

This observation is also submitted from the context of supporting the principle of sustainable, renewable energy development. 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 windfarms in Ireland. Mountaineering Ireland believes that a national focus on reducing energy consumption, coupled with a diversity of renewable sources, particularly solar electricity, off-shore windfarms and supported, community-scale schemes that deliver power directly, provide a more effective approach to meeting future energy needs. Grid developments, improved electricity storage, electric vehicles and other technological developments will all allow greater benefit to be harvested from Ireland's existing windfarm infrastructure.

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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In addition to considering national energy policy, there is need for informed and objective debate about how Ireland can best manage its natural resources – including undeveloped and semi-natural landscapes, soils, biodiversity and fresh water – all of which are being depleted at worrying rates.

The proposed wind farm is located at the southern end of the Wicklow Mountains, along the ridge of Ballymanus Hill and roughly parallel with the R747 road from Aughrim to Tinahely. The site location is highly visible across south Wicklow.

Mountaineering Ireland objected to an earlier (December 2014; ref. 14/2198) application by the same developer for a 12-turbine application at Ballymanus Hill, mainly due to concerns about visual intrusion and damage to the recreational experience. On examination of the current application it is clearly evident that this is largely the same proposal. Therefore, Mountaineering Ireland is of the strong opinion that much of the reasoning for Wicklow County Council's refusal of the original windfarm application applies equally well to this modified application, most notably how the proposed development would alter a rolling rural landscape to a more industrialised scene.

2. Observations on the proposed development

2.1 Landscape and visual impact

Mountaineering Ireland is concerned that the Landscape and Visual Impact Assessment (LVIA) submitted with the current application is deeply flawed and that this has produced conclusions that are more favourable towards the proposed development. Mountaineering Ireland's main concerns in relation to the LVIA are outlined below:

2.1.1 Selection of Viewshed Receptor Points

Despite the proximity of the proposed development site to the Mountain Uplands landscape area, designated in the Wicklow Landscape Character Assessment (2016-2022) as having the highest level of importance, the selection of Viewshed Receptor Points (VRPs) includes only one VRP out of a list of 25 within the Mountain Uplands area. While it is very appropriate that Lugnaquilla, as the highest point in the region, has been assessed, the failure to include at least one other vantage point within the Mountain Uplands, with views of the development site from a different angle, skews the overall landscape and visual impact assessment. It is notable that the documents submitted with the original application confirmed that all 12 turbines in the proposed development would have been visible from many popular summits in south Wicklow including Croaghanmoira, Croghan, Keadeen, Mullacor and Slievemaan. Based on Mountaineering Ireland's assessment this remains the case with this revised application.

The selection of key views suggests a poor understanding of how the general public engages with upland landscapes and belies the significant participation in hillwalking and outdoor recreation right across the Wicklow Mountains. Hillwalking 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 trails such as the Wicklow Way. The Wicklow Mountains are County Wicklow's largest natural asset, a highly sensitive landscape, designated in the County Development Plan as an Area of Outstanding Natural Beauty and deemed by the Council to have the highest level of importance. Applications such as this which have the

potential to undermine those special qualities should be subject to more comprehensive and rigorous assessment.

2.1.2 Location and assessment of AV2 (Ballycumber South)

Based on Section 11.3.2.3 of the EIAR it appears that AV2, Ballycumber South, has been included as a 'key view (from a feature of national or international importance)'. The point selected is on the Wicklow Way, one of Ireland's premier trails, and very popular with international visitors, however Mountaineering Ireland believes the Viewshed Receptor Point (VRP) selected is not the most suitable for assessing the visual impact of the proposed development on people walking the Wicklow Way. Although page 329 of the EIAR indicates that the view from AV2 to the development site is NNE in direction, this is incorrect as the photomontage caption for AV2 says that it is 65 degrees east of grid north (i.e. looking ENE to the development site).

It seems the VRP location is north west of the ford at Ballycumber South. As this location is relatively low with a limited scope of view, it is Mountaineering Ireland's assertion that a more natural vantage point should have been selected. The obvious location in this area would have been the high point on the Wicklow Way to the east of Garryhoe (spot height 397m). The grid reference for this location is T050757. Due to its open character this is a section of the route where many walkers pause to appreciate the view. It is also the area where walkers coming from the south first get a view of Lugnaquilla and feel that they are moving from the Wicklow / Wexford border area into the Wicklow Mountains.

Page 329 of the EIAR notes that AV2 is 2km from the nearest proposed turbine. It seems strange that visibility of nine turbines from a key view would have a '*prominent but not dominating scale*', resulting in an overall '*moderate-slight*' rating for landscape impact.

The above issues regarding the location of AV2 may explain how Table 11.8 shows AV2, supposedly a key view, scored a '*Negligible value*' for all of the following: '*recognised scenic value of the view*'; '*degree of perceived naturalness*'; '*sense of awe*' and '*presence of striking or noteworthy features*'. These ratings leave AV2 with a Visual Receptor Sensitivity rating of '*medium sensitivity*', which in turn influences the summary of Landscape and Visual Impact Assessment presented in Table 11.12 and the Conclusions in section 11.6 of the EIAR.

Mountaineering Ireland urges the planners to critically evaluate the selection of Viewshed Receptor Points, and particularly the suitability of AV2 as a key view.

2.1.3 Assessment of visual impact from Lugnaquilla (AV1)

The Analysis of Visual Receptor Sensitivity assigns a '*Mild value*' to Lugnaquilla for the '*Intensity of use, popularity, (number of viewers)*' criterion. This is extremely surprising as Lugnaquilla, the highest mountain in Ireland outside of County Kerry, would rank amongst the busiest mountains in the country. It is Mountaineering Ireland's assertion that Lugnaquilla warrants a '*Strong value*' rating.

2.1.4 Assessment of cumulative impact

Mountaineering Ireland also questions the conclusion that the proposed Ballymanus windfarm will contribute a '*Medium-low*' level of additional cumulative effect (page 358 of EIAR).

There are inconsistencies in the cumulative impact assessment with regard to the presence of other windfarms within the study area, for example Section 11.6.3 states that there is only one operational

scheme (12km to the southwest); presumably Cronelea. This conflicts with Table 1.5 which lists nine developments in the study area, many of which are operational including the 11-turbine Raheenleagh windfarm, roughly 7km to the south east. The location of Raheenleagh is incorrectly described as south west in Sections 9.5.5.1; 14.5.5.2 and 15.5.5.2 of the report.

From the perspective of hillwalkers and climbers, the cumulative visual impact of windfarm development within the southern vista from Lugnaquilla is already disturbing, and set to become worse as the six Ballycumber turbines appear on the skyline. The development site at Ballymanus Hill lies slightly further north than Ballycumber and the existing developments, therefore it is likely to be more prominent in views from Lugnaquilla. The 11 turbines proposed for Ballymanus Hill would inarguably represent cumulative impact and further diminish the quality of the superb vista from Lugnaquilla, and from other summits and mountain ridges across south Wicklow.

The assessment states that while wind energy development could not yet be considered a characteristic feature of the central or wider study area that *'if the proposed development and the other permitted wind farms are eventually realised, there will be a sense that wind energy development is a familiar and even characteristic feature of the study area.'*

It is Mountaineering Ireland's position that it would be highly undesirable for wind energy development to become a characteristic feature of the study area. This would represent an unacceptable degree of change to a sensitive, scenic rural and upland landscape. Furthermore, the windfarm proposed for Ballymanus Hill, in combination with the one currently being developed on Ballycumber would mark an encroachment of large-scale built development towards the core of the Wicklow Mountains. Therefore, Mountaineering Ireland strongly refutes the consultant's conclusion that *'the proposed Ballymanus windfarm does not represent the crossing of a critical threshold with regard to cumulative wind energy development in this area'*.

2.1.5 Industrialisation of landscape

In Mountaineering Ireland's view, Wicklow County Council's reasons for refusal of the original Ballymanus windfarm application (ref. 14/2198) quite rightly stated that the proposed development would alter the reading of a rolling rural landscape to a more industrialised scene, when the accumulation of both existing and permitted windfarm developments are viewed in the setting.

In Section 11.6.4 of the EIAR the consultants argue that wind farms are not an *'industrial'* form of development, going on to say that the vast majority of wind energy development has taken place in upland, rural and peatland areas to date and it is not considered that any of these areas now feels urbanised or industrialised. Mountaineering Ireland disputes the claim that locations with windfarms do not feel industrialised; this point is developed further in Section 2.2 below.

There could be little argument that the renewable energy sector is not an industry, and that power generation on the scale proposed at Ballymanus is not an industrial use of land. Wind turbines are the largest manmade structures being imposed on Ireland's upland landscape, each one with a substantial concrete foundation and a service road of a scale unprecedented in such settings. The incongruity and prominence of windfarms in rural settings is exacerbated by the movement of the turbine blades. Indeed, had the wind industry not long since adopted the benign term *'farm'* it would be far more appropriate to describe these as wind energy factories.

Developers target rolling rural landscapes such as the location of the proposed Ballymanus windfarm partly because their sparse population is calculated to provide less resistance to development, and because they are outside the zone of greater protection afforded though Natura 2000 designations. Mountaineering Ireland challenges the apparent presumption that remote and undeveloped landscapes are appropriate locations for industrial-scale renewable energy developments. Should these developments not be centred in industrial zones on the outskirts of cities and towns, with easier grid access and closer to demand centres?

2.1.6 Decommissioning

Mountaineering Ireland questions the developer's assertions that a windfarm would not result in a permanent impact on the landscape, and that within two to three years of decommissioning there would be little evidence that a windfarm ever existed on the site. Examples should be provided of where windfarms have been dismantled and landscape successfully restored. In addition to the near impossibility of restoring the natural environment to its original state, it is clear that the ownership of windfarms can change many times and therefore it is difficult to envisage how planning conditions related to decommissioning could ever be enforced. Therefore a cautious approach is advocated for any applications which involved the loss of undeveloped land and semi-natural habitats.

2.2 Damage to recreational experience

2.2.1 The impact on mountain users

The proposed turbine locations at Ballymanus are between 250m and 350m in altitude. Ireland has a very limited stock of mountain land, with just 6% of land area above the 300m contour. That limited area of mountain land includes Ireland's least altered landscapes, and the areas which hold greatest attraction for walkers and climbers. For many people the appeal and value of Ireland's mountains lies in their relatively wild character, the lack of manmade structures and development, the openness of mountain landscapes, and the way in which the mountains provide an antidote to the crowded urban environment in which the majority of people spend most of their lives.

Ireland's extremely limited stock of undeveloped mountain land is irreplaceable and it is being depleted every day by renewable energy developments, afforestation, extractive industry, the erection of new fences and communications masts, the construction of new roads and tracks, and other built development including inappropriately sited housing.

Consultation with Mountaineering Ireland members in 2016 identified '*peace and quiet*', '*natural beauty*', '*wildness*' and '*escape*' as the main attributes which make their 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 wild landscape is a crucial part of the mountain experience.

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 windfarm will detract from the quality of the recreation experience currently enjoyed in south Wicklow.

This assertion is also supported by research from Scotland which provides clear evidence that mountaineers 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).

2.2.2 Impact on the Wicklow Way and Tinahely trails

The Wicklow Way, which runs to the west of the proposed development site, is at one point only 1.5km from the location proposed for one of the turbines. As Ireland's oldest long-distance walking route, and one of only five nationally considered to have the potential to reach international standard in the short-term, the Wicklow Way is an amenity of national significance (NTO, 2010, p.25).

The development proposed for Ballymanus will dominate one of the more attractive sections of the Wicklow Way, at Garryhoe, which also coincides with the Tinahely National Looped Walks. This section currently enjoys open views across a rolling rural landscape to Croaghanmoira (664m) and the main ridges and summits of the Wicklow Mountains. Due to the issues identified in 2.1.2 above, the location chosen for the AV2 VRP does not, in Mountaineering Ireland's judgement, provide a valid assessment of the impact that the proposed development will have on users of the Wicklow Way.

The developers suggest in Section 9.5.3.3 that the development of a windfarm can have positive impacts in terms of recreation, for example through the provision of a 'wind trail'. Examples from Germany are quoted. Any such suggestion must be considered within the context of its immediate and surrounding landscape. The recreational experience currently enjoyed on the Wicklow Way, and on the forest tracks at Ballymanus itself, will not be enhanced through substantial widening of tracks, and the addition of towering turbines and their associated infrastructure.

Members of Mountaineering Ireland clubs based in south Wicklow and north Wexford have provided feedback on how walks previously enjoyed regularly by their groups have been destroyed by the construction of windfarms. Members have spoken of the large roadways to service turbines as '*blots on the landscape*', of feeling diminutive as one walks close to a turbine. One member spoke of how the continually recurring '*whoosh*' of turbine blades, combined with the movement of their shadows sweeping across the ground can leave a walker filled with a desire to get away from the windfarm. Based on these direct experiences it is abundantly clear that being in the vicinity of a windfarm does not make for a relaxing and enjoyable recreation experience.

Tinahely Community Projects, a local voluntary group, has invested considerably in the development of walking trails over the last decade. The proposed development would be clearly visible from many of these routes and would undermine the attractiveness of the Tinahely and Aughrim areas as a destination for trail walkers. It would also affect the residential amenity enjoyed by local communities.

2.2.3 Impact on tourism

Fáilte Ireland's annual Visitor Attitudes Surveys consistently show that the friendliness of the people, the beautiful scenery and the natural, unspoilt environment are the main factors that influence overseas visitors in choosing Ireland as their holiday destination.

The centrality of quality scenery to visitor experiences, and the State's role to protect this, are highlighted in Ireland's current tourism policy 'People, Place and Policy - Growing Tourism to 2025':



'The quality of our natural scenery and physical environment, physical heritage, and the range of activities for visitors, are areas in which the State has a key role to play, through preservation of that which is irreplaceable and the development of that which enhances the visitor's overall experience.'
(DTTAS, 2015)

The beautiful scenery and the natural, unspoilt environment found in Ireland's mountain areas is irreplaceable. These areas are vital natural assets which should be wisely managed for societal benefit through appropriate planning.

Upland areas have a key role within Ireland's rural tourism offering. Fáilte Ireland research shows that 1,193,000 overseas visitors engaged in hiking or walking as part of their holiday in 2014. These visitors had an overall spend of €915 million (Fáilte Ireland, March 2016). Hiking has also been shown to be the most popular active leisure pursuit amongst domestic holidaymakers (Fáilte Ireland, September 2016).

The developers behind the Ballymanus application claim (in Section 9.5.3) that there is no evidence to suggest a correlation between windfarm development and an adverse impact on tourism.

A glance at tourism websites and brochures will immediately illustrate that Wicklow's beautiful landscape is the key asset underpinning tourism in the county. In addition to the research referenced in Section 2.2.1, further evidence emerged from Scotland during July 2017. A survey conducted by YouGov on behalf of 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 wind farms, electricity transmission lines and super-quarries.

In the immediate vicinity of the proposed development site, recreation and tourism are vitally important to the village of Tinahely, and equally so in Aughrim. There are also small tourism-related businesses dotted throughout the central study area. Were this development to proceed, bringing with it that feeling of '*windfarm development being characteristic of the area*', it would undermine the tourism offering in south Wicklow and impact negatively on local sustainable tourism investment and recreational infrastructure.

2.3.1 Archaeology

A brief examination of Chapter 13 of the EIAR indicates that the threat to the archaeological heritage of the site is inadequately dealt with. The marked concentration of archaeological features on the south western spur of Ballymanus Hill, including two bivallate ringforts, provides direct evidence that this area has been important to, and respected by, people for many centuries. The history of Preban church and graveyard and how they link older monuments on the hillside above has been researched by local archaeologist, Yvonne Whitty, and featured in a two-part documentary funded by the Heritage Council, and the Heritage Office of Wicklow County Council (WCC, 2014). It is surprising that this work is not referred to in the EIAR.

Mountaineering Ireland is concerned that were this proposal to be approved, these national monuments would be dwarfed by turbines and the character of this historic landscape altered to an unacceptable degree. The adverse impact on the visual setting of the monuments will be exacerbated by the nearby Ballycumber windfarm (currently being developed). Mountaineering Ireland believes this should be an important consideration for the planners evaluating the application.

2.4.1 Ecology

The development site is less than 1km from The Ow River and Derry Water, both of which feed into the Aughrim River. This river system is noted for its salmon and trout populations. Chapter 6 refers to freshwater pearl mussel and lamprey species also living in the river system. The freshwater pearl mussel, which has a lifespan of up to 130 years, is Ireland's longest living animal. It is also one of Ireland's most sensitive and endangered species and is designated as an Annex II species under the EU Habitats Directive. Ireland's freshwater pearl mussel population is important in a European context; the Republic of Ireland is estimated to hold 46% of all the pearl mussels in the European Union. As the pearl mussel is a filter feeder the main threat to its health is from fine sediment and nutrients from land entering its freshwater habitat. The freshwater pearl mussel is the focus of a new locally-led agri-environment scheme, initially being rolled out in eight catchments in Ireland.

From an ecological perspective, most of the negative impacts of windfarms occur during site work at the development stage. The mitigation measures included in the EIAR seem to rely in large part on good practice guidelines for forestry, and while clear-felling does present a threat to the pearl mussels, the extensive road-widening and excavations associated with the development may pose a greater threat as they will generate very significant volumes of silt and sediment. The development proposal does not appear to present credible reassurance that there won't be damage caused to this key species.

3. Conclusions

Mountaineering Ireland is concerned that aspects of the Environmental Impact Assessment for the proposed Ballymanus windfarm are either flawed or deficient, particularly the landscape and visual impact assessment. The Wicklow Mountains and their associated upland landscape are irreplaceable natural assets which should be wisely managed through the planning process for the benefit of future generations.

To add further wind turbines to the landscape of south Wicklow, particularly on the threshold of the core Wicklow Mountains area, would result in an unacceptable cumulative impact, industrialising and devaluing a scenic upland landscape. It would diminish the quality of the experiences enjoyed by hillwalkers and by users of the Wicklow Way and other trails in south Wicklow.

Approval of this application would also undermine the significant public and community investment already made in recreation management and infrastructure in south Wicklow, 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 is of the strong opinion that the reasons for refusal of the earlier Ballymanus windfarm remain largely valid and that this proposal would result in an unacceptable level of industrial development in this scenic upland area and therefore would be contrary to the proper planning and sustainable development of the area.

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

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