



**Mountaineering Ireland response to Department for
Infrastructure Strategic Planning Division re
P/2015/0218/F - Gruggandoo windfarm**

13th October 2020

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1. Introduction and context

As the representative body for hillwalkers and climbers on the island of Ireland, Mountaineering Ireland has a particular concern for ensuring the sustainable use of Northern Ireland's upland areas. Mountaineering Ireland therefore represents a community of interest in this application, drawn from Co. Down, across Northern Ireland, and the island of Ireland.

The Mourne Mountains are a hugely significant element in Northern Ireland's landscape, providing defining geographic features, beautiful scenery and one of our largest area of relatively wild land; all factors in the designation of this as an Area of Outstanding Natural Beauty (AONB).

The proposal is for a development comprising eight turbines with an overall height of 142.5m on a broad ridge approximately 3.5km southwest of Hilltown. The site is entirely within the Mourne and Slieve Croob AONB. This is the second amendment to the developers' 2015 application.

Mountaineering Ireland is strongly of the view that this development would completely undermine the integrity of the AONB designation in the Mournes and that it would be unacceptably damaging to the visual amenity and landscape character of this area. The development would also greatly diminish the quality of current and future recreation experiences in the Mournes, thereby reducing the economic benefit that recreation and tourism bring to the area.

Mountaineering Ireland submits these comments from the context of supporting the principle of sustainable, renewable energy development. It is the siting, scale and impact of the proposed development that is of concern. A greater diversity in renewable sources, improvements in grid capacity, better energy storage solutions and the re-powering of older windfarms will all assist in achieving the UK target of net zero carbon emissions by 2050, without the further loss of undeveloped scenic landscapes.

This submission should be read in conjunction with Mountaineering Ireland's earlier submissions on this application (https://www.mountaineering.ie/files/20178241295_30dca146.pdf).

2. Impact on Area of Outstanding Natural Beauty (AONB)

The eight areas in Northern Ireland designated as Areas of Outstanding Natural Beauty (AONB) are our most highly valued and exceptional landscapes. The Mourne AONB extends beyond the Mourne Mountains to include lowland and coastal landscapes and northwards to include Slieve Croob. The mountains, countryside, coast and settlements of the Mourne AONB comprise a diverse resource of immense importance in respect of their landscape, wildlife, built and cultural heritage.

By definition, 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.'* AONBs in Northern Ireland have weaker legal protection than in the rest of the UK and most AONB management bodies lack sufficient resources to be effective in the management of their respective landscapes. Given this situation, it is incumbent on the Strategic Planning Division to ensure proper protection of this important scenic landscape.

The Strategic Planning Policy Statement for Northern Ireland (SPPS) requires that development proposals within AONBs must be sensitive to the distinctive special character of the area and the quality of their landscape (DoE, 2015).

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... 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).

A development of this scale, in this setting, would unquestionably diminish the special character of the overall Mourne AONB as well as the site's closer surroundings and therefore is not compatible with the SPPS and with Policy RE 1 of PPS 18 'Renewable Energy'. It would also create an unwelcome precedent for industrial development within the Mourne AONB which could further erode the quality of this special landscape in the future.

Mountaineering Ireland notes and concurs with the conclusion of NIEA's Natural Environment Division (submission dated 28th August 2020) that this proposal is *'contrary to Policy NH 6 of PPS 2 'Natural Heritage' as it is not sympathetic to the special character of the Area of Outstanding Natural Beauty in general and of the particular locality, and that it is also contrary to Policy RE 1 of PPS 18 'Renewable Energy' due to the unacceptable impact on visual amenity and landscape character due to the number, scale, size and siting of turbines'*.

3. Landscape and Visual

Mountaineering Ireland has significant concerns that the Landscape and Visual Impact Assessment (LVIA) for the proposed development is deeply flawed. Arising from these concerns Mountaineering Ireland sought the views of a Chartered Landscape Architect. Observations from Mullin Design Associates (MDA) on the proposed development are attached as Appendix 1.

The MDA report raises multiple issues, including in relation to the Assessment Criteria used for the LVIA and how these have influenced the outcome of the assessment, and particularly in relation to how the impact of the proposed development on the Mourne Mountains has been downplayed. The report concludes that there is not capacity within the local landscape to absorb a large-scale wind farm, and that the proposed development would have a major adverse impact on the character of the landscape in the Mourne Mountains.

In addition to submitting the MDA report, Mountaineering Ireland raises the following issues in relation to the analysis of the Landscape and Visual Impact Assessment in Volume 1 of the Environmental Statement.

Environmental Statement - Volume 1 - Chapter 5 Landscape and Visual

This Chapter was written by Barton Willmore Landscape Planning and Design and it is clear they do not know, understand or appreciate the Mourne landscape and its attraction to people as the pre-eminent mountain landscape in Northern Ireland.

There are incorrect, inconsistent and illogical comments in almost every paragraph, written cleverly to, on the face of it recognise the high impact this proposal will have on the quality of the Mourne landscapes, and simultaneously twisting this impact to make the case it is only to be expected with a windfarm and so acceptable, founded on a proposition that the proposal is of such regional significance that that over-rides the impact it will have.

Specific comments are (referring to the paragraph numbers in Chapter 5 of Volume 1):

5.25, 5.29 and 5.78 The premise is made that the site lies 2.5 km west of the ‘Mourne Mountains’ and this is later on used to justify its acceptance as it is not part of the ‘Mourne Mountains. It may be 2.5km west of the Mourne Mountains LCA but that is very different from being outside the Mourne Mountains and it is obviously well within the Mourne AONB. Visually and geographically the site is very much part of the Mourne Mountains. Paragraph 5.29 also starts a trend of trying to make the case that the Western Mournes is not as important as the Eastern Mournes and, again, this is used later on to justify the impacts on the Western Mournes as being acceptable because there is no impact on the (more important) Eastern Mournes. This analysis is partly based on using defined tourism and recreation nodes such as Tollymore, Cranfield (questionable) etc, but it is based on a fundamental misunderstanding of the value of the Mournes and all its many landscapes. There is not a single Mourne identity and all of them are important.

This argument is then taken up in 5.78 which states that as the site is only visible from 30% of the AONB (and not the more important Eastern bit) then it’s all fine. Firstly, we would challenge the 30% figure as it is only considering the high mountain section of the AONB and not the whole AONB, but in any event, even 30% of the high mountains is a very large and important part of the protected landscape, every bit as important as the Eastern section, different in character but no less valuable.

5.44, 5.76 and 5.94 The selection of a few ‘Scenic Routes’ gives the impression that those are crucial for the appreciation and understanding of the Mournes. This goes to the heart of the flaws in this analysis as it pre-supposes that a relative measurement of impact from a carefully selected group of viewpoints can then be rationalised by ‘only’ 10 of the 26 showing any significant impact. Setting aside the flaws in their measurement of that impact, it is clearly nonsense to include as one of those key views Clogh Castle (some 24.3km away on the other side of the Mournes) and equate that to the view on the Mourne Way at Rocky Mountain, some 4km away, in some way balancing them out. There is a distinct lack of key views of the main mountains, upland paths and access points in close proximity to the site – Eagle Mountain, Shanlieve, Pigeon, Moughanmore, Altnataggart, Tievedockaragh etc. The picnic site at Leitrim Lodge is selected – an enclosed lowland site surrounded by trees, but not the popular trail from it to Pierce’s Castle etc. In 5.94 the case seems to be being made that prominence in the 2-5km range is only to be expected and so shouldn’t be a reason not to permit it. This is fundamentally flawed reasoning.

As stated in Mountaineering Ireland’s previous submissions, Slieve Gullion mountain summit, and Slieve Foye or Carlingford Mountain should be included in the LVIA.

5.52-5.53 These paragraphs contain a misleading analysis of the Regional Landscape Character assessment (RCLA), which it quotes as stating that wind energy is a ‘driver for change’ in the landscape as if that is a good thing when in fact it is talking about the potential for negative impact. The RCLA does go on to talk about the potential impacts of climate change but it does **not** say that provision of wind turbines in the Mournes must be considered as a mitigating factor of that, as is set out in 5.53. This verbal gymnastics pervades the document.

5.58 - 5.89 *‘The site was chosen so the turbines will not displace any important features’.* This is clearly nonsense and no comparative site analysis has been shown to justify that. By their very nature, 142.5m high turbines displace landscape features. 5.89 claims that the turbines represent only a ‘minor vertical scale’ when compared with other landscape features. This is again clear nonsense – there are no landscape features in this area anything remotely close to 142.5m in vertical height and the prominence of the turbines in the illustrations clearly demonstrates that.

5.131 and 5.139 The so called ‘reversibility’ after 25 years is seen as a mitigating factor. Setting aside the chances that the turbines will be removed and the landscape restored after 25 years, this is not mitigation. 25 years of impact on a generation of the population cannot be set aside.

5.133 The value of the site is denigrated as not being ‘wholly wild’ and so in some way it is fine to industrialise it. No landscape in the Mournes (or indeed Ireland) is ‘wholly wild’ – all are shaped by human activity over centuries and that is an inherent part of their character. That slow, small scale impact of farming, quarrying and recreation creates bonds of understanding between people and the land, and enriches its meaning. Imposing on that a large scale, industrial wind farm is blatantly disruptive of that relationship.

5.134 – 5.135 The assessment of the impact on the Slieve Roosley LCA 72 is that it is ‘Moderate Adverse’. This is despite the fact that in 5.56, 5.57 and 5.58 it is rightly acknowledged as ‘an attractive open landscape of windswept wild hilltops and more intimate valleys’ which is ‘highly sensitive to change’, and of ‘High Scenic Quality’. In 5.134 it notes that the proposals will ‘appreciably reduce the sense of remoteness and tranquillity’ and yet that is only regarded as a Medium magnitude of impact. It is quite obvious, by their own assessment, that the proposal would have a High or Major impact on LCA 72 and this, combined with the High Sensitivity, gives a Major Adverse impact.

5.137 states *While the introduction of the Proposed Development within the landscape will introduce a new and distinctive feature within a localised part of the Mourne AONB, it is sufficiently sited (approximately 3km to the west of the westernmost extent of the main body of the Mourne Mountains) so as not to affect the overall integrity of the AONB and its purpose for designation.*

This is a fundamentally flawed argument. Firstly, the word ‘distinctive’ implies the turbines have some artistic or aesthetic quality which they do not have – they are an industrial intrusion into a natural landscape of acknowledged high scenic quality. Secondly, the site is clearly within the Mourne Mountains in any rational sense of understanding of landscape and well within the Mourne AONB. They are not 3km from the Mourne Mountains and quite obviously affect the overall integrity of the AONB and its purpose for designation – as an area of Outstanding Natural Beauty.

5.138 states *For the most part the Proposed Development will not be perceived across the Mourne AONB (with the ZTV extent overlapping less than 30% of the landscape), with the visual envelope of the wind turbines limited to the western part of the AONB due to the containment provided by the Mourne Mountains range that prevents intervisibility from the main body and core of the AONB (including the main tourist and recreation areas). Notwithstanding the above, the sense of wildness and tranquillity within the western part of the Mourne AONB will be discernibly reduced, while the wind turbines will form prominent features in isolated easterly views towards the distinctive profile of the Mourne Mountains. Similarly, in westerly views from the Mourne Mountains the wind turbines will be present in certain views, albeit seen in the context of quarrying/landfill activities within the elevated undulating landscape that separates the Mourne Mountains from the Newry basin.*

5.140 states *The key characteristic of the juxtaposition between the Mountain and Sea will remain unaltered, while the presence of the wind farm will not be appreciated from the main noted tourist attractions and destinations within the Mourne AONB (given the siting of the Proposed Development in the south-western periphery of the AONB, which is contained by the more elevated Mourne Mountain range), thereby the visual influence of the Proposed Development will be localised. Direct impacts on the landscape resource will be limited to the Gruggandoo area, and given the small footprint of the Proposed Development, these will be diminutive in nature. The overall integrity of the*

AONB will not be fundamentally altered and the Proposed Development will not undermine its importance or purpose for designation as the AONB will remain an area of high scenic value and accordingly will not result in an unacceptable adverse impact, which is therefore in accordance with the SPPS.

There are so many misconceived statements in these two paragraphs that they merit a line by line dissection.

The western Mourne is an integral part of the 'main body' of the Mourne and even if the 30% figure is accepted (which we do not) that is still a major impact. It is disingenuous to try and state that because the site cannot be seen from the 'main tourist and recreation areas' then it is somehow fine that it impacts on the rest of the AONB. In any event, the Western Mourne is one of the 'main tourist and recreation areas' with very large numbers of people (especially since the pandemic-induced awareness of the value of open spaces and active outdoor recreation) using the access points at Hen Mountain and Leitrim Lodge. Hen Mountain is probably now one of the most visited summits in the Mourne and The Mourne Way attracts large numbers of people.

The views west from all the Western Mourne summits – across to the Slieve Gullion AONB in particular - are of high value and importance. From all the western Mourne summits and the Mourne Way, the wind farm will appear in the foreground, completely changing that view of undulating natural and farmed landscape. The reference to quarrying/landfill activities is laughable – these are so small (faces of up to 10-20m in height) and distant from the Mourne (15-20km) as to be insignificant in the landscape compared with 142.5m high turbines at 4-5km distance.

Yet, even so, this paragraph 5.138 acknowledges that *'the sense of wildness and tranquillity within the western part of the Mourne AONB will be discernibly reduced, while the wind turbines will form prominent features in isolated easterly views towards the distinctive profile of the Mourne Mountains'*. That in itself, should be sufficient reason to have this application refused, yet somehow, without any rational reasoning it is then stated that the overall impact is not significant and that on LCA 72 is 'diminutive in nature'. By any rational assessment this is wrong – the proposals will have a major adverse impact on a very significant proportion of the Mourne AONB and the purpose of its designation, to recognise and protect an Area of Outstanding Natural Beauty, will be fundamentally undermined. The impact on LCA 72 is not by any reasonable measurement 'diminutive' but Major Adverse.

5.141 states *On balance, given that the introduction of the Proposed Development will result in very localised direct impacts, discernibly reduce the visual amenity experience and sense of wildness and tranquillity within a localised part of the Mourne AONB, and introduce a new form of development within an upland landscape (albeit a change that is reversible), a Very Small magnitude of effect will arise. Despite taking into account the High sensitivity of the Mourne AONB, the effect that will arise is not considered to be significant.*

The statement above goes to the heart of the issue and contains a series of incorrect statements. Firstly, the impacts are not 'localised' but measurable over a very wide area, designated to protect the quality of the natural environment. The area affected is a very significant part of the Mourne AONB and it is a mis-characterisation to refer to it as 'localised'. Secondly, it is not just a 'new' form of development, but a large scale, industrialised form with turbines reaching 142.5m in height, many times higher than existing individual farm-based turbines in the lowlands around the Mourne. The change is not by any rational understanding 'reversible'. The impact can in no way be properly described as 'Very Small' and the effect will quite obviously be profoundly significant as even the limited range of relevant views demonstrates.

5.153 states *It is of note that all visual receptors that are likely to experience significant effects lie within 5km of the Site, and no receptors beyond this distance will experience significant effects. Given the nature of the form of development this is to be expected, as set out in the 'General Perception of a Wind Farm in an Open Landscape' PPS18 Best Practice Guidance "is not [necessarily] enough for the visual impact to be considered unacceptable". In light of the above and the nature of available views from the surrounding landscape, it is therefore apparent that the Site is an appropriate location to site a wind farm of the scale proposed.*

This is incorrect and not proven by the submission. Important 'visual receptors' in the 5-10km range have not been chosen and in any event the focus on a small number of specific viewpoints tends to diminish the impact from a wider, well-travelled landscape. The impact is not just on people static at some fixed viewpoint but on large numbers of people traversing an open landscape or along the many upland paths and marked trails in the area including the Mourne Way. This impact is completely underplayed in the document, but it can be easily understood by those who know and understand the mountains and the value of open natural spaces. This is not a small group of people but a large, and increasing proportion of society who recognise the value of open and natural landscapes. The visual impact of this proposal is completely unacceptable in the Mourne AONB, and would set an unforgivable precedent in that no part of the AONB would be safe from development if the arguments and standards used in this submission are accepted. The site is totally inappropriate for a windfarm of this scale – even a single turbine in this location would be unacceptable disruptive of a much valued and designated landscape.

5.172 states *Siting a wind energy development within the Mourne AONB is likely to result in adverse effects, however this does not necessarily directly translate to giving rise to unacceptable adverse effects. It is clear that while the Proposed Development is sited within a designated landscape of high scenic quality, its location within the south-western periphery of the AONB ensures that its introduction within the landscape is for the most part not perceived across the AONB landscape, including from those areas identified as key tourist and recreation destinations. As such, landscape and visual impacts on these tourism receptors will not arise and accordingly the Proposed Development is in accordance with Policy TSM8 of PPS 16.*

As above – this statement is fundamentally flawed. The Western Mournes is a key tourist and recreation destination by any measure.

5.173 states *It is acknowledged that the introduction of the Proposed Development would alter the perception and characteristics of the open and rugged profile of the Slieve Roosley range, and accordingly a significant effect is identified in relation to LCA 72 – Slieve Roosley. However, the distinctive identity and sense of place would remain, as the Proposed Development is sited within an upland area that is distinct from the settled lower slopes and valley formations that define the LCA, due to elevation and the underlying existing land use. Furthermore, no landscape features of importance or recognised value would be lost as a result of the introduction of the Proposed Development.*

How can the 'distinctive identity and sense of place' in LCA 72 be retained when the landscape is transformed into an industrial scale windfarm – this statement is clearly perverse. There is a High Adverse impact on LCA 72.

5.174 - 5.176 These paragraphs relate to views from the lowlands to the Mournes and seeks to downplay the impact of the proposed development, making a subjective statement which is not backed up by the visualisations, limited as they are. In reality, the proposal will have a Major Adverse impact on the views to the Mournes from a very wide area and so is contrary to Policy RE1 of PPS18.

Sequential views Unlike motorists, walkers, climbers and others engaged in human-powered recreation move through the landscape slowly, experiencing a range of views sequentially, over a number of hours or perhaps a full day. The cumulative impact of sequential views appears not to have been assessed. The Scottish Natural Heritage guidance on *Visual Representation of Wind Farms (2017)* recommends that LVIA Assessment should include such sequential views.

Transboundary issues In relation to LCA 72, where the proposed development site is located, the Supplementary Planning Guidance to Accompany PPS 18 'Renewable Energy, requires that *'Particular care should be taken to avoid adverse impacts on the distinctive skyline profile of the upland ridges and on views to and from the Mournes, Carlingford Lough and Carlingford Mountain'*.

The conclusion in paragraph 3.59b of the Environmental Statement is that the LVIA has given consideration to transboundary issues and that the proposed wind farm is compliant with this criterion, however we cannot see where the impact of the proposed development on Carlingford Mountain has been considered.

Undeveloped land Mountaineering Ireland has previously highlighted concern at how the proposed development would continue the depletion of Northern Ireland's very limited stock of undeveloped land. 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). There is growing concern worldwide at the loss of natural and semi-natural environments. As highlighted in David Attenborough's 2020 film *Life On Our Planet* which notes that 64% of our planet was wilderness in 1954 and just 35% is today. While Northern Ireland does not have 'wilderness', in the context of our landscape and environment, undeveloped land is our equivalent, once it's developed, it's gone forever.

4. Tourism Impact Assessment

This Chapter has been prepared by CHL Consulting Company Ltd. and starts with the statement that:

In effect, revenue reduction is the only metric that counts in determining whether some external event will have a negative impact on tourism.

It goes on to argue that because Gruggandoo does not directly support any revenue earning tourism asset it is therefore of no value to tourism. This is such a fundamental misunderstanding of the tourism value of open mountain landscapes that it renders the rest of this chapter as flawed in reason and thinking. Gruggandoo is an integral part of the Mourne AONB and therefore, by its current nature, contributes to the overall tourism asset of the Mournes. Turning it into an industrialised windfarm fundamentally changes that character and diminishes the whole.

Even though the economic impact of day visitors may be smaller than that of overnight visitors, and difficult to capture, it is the lifeblood of countless cafes, car parks and other businesses in the Mourne AONB. The growth of such businesses in recent years is notable, for example at Carrick Little, where the majority of customers are walkers or climbers.

Game of Thrones It is noted that: *The tourism sector in Northern Ireland has in recent years harnessed the interest from overseas consumers in visiting film locations associated with the "Game of Thrones" TV series. Whilst some filming and tours currently take place within the Mourne AONB,*

these locations are clustered at the Newcastle/Castlewellan side of the mountains and will not be impacted as views of the proposed wind farm are obscured at these locations.

The writers are ill-informed – one of the key filming sites for ‘The Game of Thrones’ was Leitrim Lodge – close to the Rocky Mountain viewpoint, which the visualisation shows will be significantly adversely affected by the proposals. It is difficult to see how it could be used for such a film set with the windfarm in place.

Mourne Way Paragraph 14.44 notes: *The Mourne Mountains: A Walkers Guide is published on www.WalkNi.com. - it recommends (p4) five walking itineraries in the Mournes – (1) Conquer the Peaks (37.7km) a three day itinerary scaling the six highest peaks in the Mournes – “suitable for experienced walkers with a high level of fitness”, (2) Mourne Way (42km), - “a two day itinerary covering 21km per day”, (3) Flavour of the Mournes (37 km) – “gives walkers a true taste of what the Mournes are all about”, (4) the Mourne Wall Challenge (30.5km) – “only recommended for confident hill-walkers with high stamina and experience in mountain challenge walks”, and (5) The Best of the Mournes (24.6km) – “a reasonably strenuous option suitable for confident walkers”.*

Only one of these five walks (Flavour of the Mournes) passes close to the proposed wind farm site. The other walks are further east in the Mournes and along the coastal strip, and so are at a significant distance from the Gruggandoo site.

Again, the writers are ill-informed. The Mourne Way passes close to the Hen Mountain and the Rocky Mountain selected viewpoints, and for at least 8km of its length is within 5km of the proposed site - so a very substantial part of it is directly and continuously affected by the proposals. The Mourne Way is the most popular waymarked trail in the Mournes but a focus on it downplays the wide use of the many unmarked, informal routes in the Western Mournes used by tens of thousands of local people and visitors every year.

Mourne Heritage Trust As Mountaineering Ireland was aware that the Mourne Heritage Trust had not taken a position on this proposed development we were surprised by the thrust of the comments on page 474 of the Environmental Statement (paragraphs 14.17-14.19), which include that the Trust responded positively to the proposals. We have contacted the Mourne Heritage Trust and we understand they will respond directly on this.

5. Impact on recreation experiences in the Mournes

The developers have made no attempt to assess the impact of the proposed development on recreational visitors to the Mourne AONB. Every day the Mourne Mountains inspire, shape and enrich recreation experiences enjoyed by hillwalkers, climbers and other recreational visitors.

Hillwalking As distinct from trail walking, 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 walks such as the Mourne Way. Hillwalking is a significant activity right across the mountains of the Mourne AONB.

The Mournes The importance of the Mourne Mountains to hillwalking in Northern Ireland, and on the island of Ireland, cannot be overstated. In August 2020, Mountaineering Ireland published *Irish Peaks - a celebration of Ireland’s highest mountains*. This hardback book (which is already being reprinted), includes hillwalking routes on Ireland’s highest 100 mountains. Just 11 of the 100 peaks are in Northern Ireland, nine of these are in the Mournes.

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.

Health and wellbeing Even if there was no economic benefit flowing from recreation users (which is not the case), the contribution these activities make to personal health and wellbeing cannot be ignored. The multiple benefits that people get from being outdoors in natural environments have been documented in a plethora of recent studies, one notable example being the outputs from the Benefits of Outdoor Sports for Society (BOSS) project. The report of this project is available here: <https://outdoorsportsbenefits.eu/wp-content/uploads/2019/03/BOSS-Stage1-Full-Report.pdf>

A survey conducted by Outdoor Recreation NI in the first half of May 2020 found increased engagement with the outdoors in Northern Ireland during Covid-19. It also illustrated the benefits of this activity – with 84% of respondents feeling physical health benefits, and 90% reporting benefits relating to their mental health and wellbeing. More than three quarters of respondents to the survey (79%) agreed that spending time outdoors made them feel closer to nature, with survey participants who engaged in outdoor activity more frequently reporting a higher level of nature connection. The Outdoor Recreation NI survey also indicates that many of those who have engaged in outdoor activities during the Covid-19 period intend to continue this activity, with 51% of people saying they expect to spend more of their free time in the outdoors when Covid-19 restrictions are eased.

Impact of windfarms 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.

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.

A 2016 membership survey by our sister body Mountaineering Scotland, found that of 1,439 respondents, over two thirds stated that they prefer not to see windfarms when in the mountains and 23% said that they avoided areas with windfarms when planning their activities (Mountaineering Scotland, 2016). This illustrates how the proposed development would diminish recreational enjoyment of the Mourne Mountains and how it could displace recreation activity, with consequent impact for local businesses.

Both the recreational and tourist uses of the Mourne Mountains 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.

6. About Mountaineering Ireland

Mountaineering Ireland is the representative body for hillwalkers and climbers on the island of Ireland. Mountaineering Ireland's mission is to represent and support hillwalking and climbing. Our Vision is that hillwalkers and climbers will become more skilled, self-reliant and informed, that access will be improved, and that our mountain landscapes will be valued and protected.

Mountaineering Ireland is recognised as the National Governing Body for the sport of mountaineering by both Sport Northern Ireland and Sport 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 13,600 members, comprising 190 clubs and approximately 2,000 individual members (October 2020).

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