



**Mountaineering Ireland's response to Carlow  
County Council re planning application 2113 -  
Croaghaun windfarm**

**25<sup>th</sup> February 2021**

## Contents

1. Introduction and context	3
2. Impact on Walking in the Blackstairs Mountains	3
3. Landscape and Visual Impact	7
4. Planning Context	9
5. Conclusions	11
6. About Mountaineering Ireland	11
References	12

## **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 Ireland's upland areas. Mountaineering Ireland therefore represents a community of interest in this application, drawn from Co. Carlow, the south east, and across the island of Ireland.

The Blackstairs Mountains are a hugely significant element landscape of the south-east, this chain of rounded granite mountains rises between the beautiful Barrow valley and the lowlands of Wexford, marking the boundary between counties Carlow and Wexford and forming a landscape cherished for its scenic qualities.

The proposal is for a development comprising seven wind turbines with an overall height of up to 178m, mainly within Coillte forestry on Kilbrannish Hill, immediately north of the Corrabut Gap. The site is 3km north east of the well-known Nine Stones viewing point and less than 5km from the summit of Mount Leinster, the highest point in both Co. Carlow and Co. Wexford. The applicant is Coillte CGA.

Commercial windfarms on this scale should be described as wind factories. Mountaineering Ireland is strongly of the view that the proposed development 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 Blackstairs, 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. Offshore wind development, a greater diversity in renewable sources, improvements in grid capacity and better energy storage solutions will all assist in achieving Ireland's goal of carbon neutrality by 2050, without the further loss of important scenic landscapes.

## **2. Impact on Walking in the Blackstairs Mountains**

The developers have made little attempt to assess the impact of the proposed development on hillwalkers in the Blackstairs Mountains. It is important to understand how the Blackstairs Mountains inspire, shape and enrich recreation experiences enjoyed by hillwalkers, trail walkers and other recreational visitors.

**2.1 Hillwalking** - 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 South Leinster Way.

The experience of hillwalking in the Blackstairs is characterised by expansive views across fertile countryside, in marked contrast with that experienced in many other mountain areas. Granite boulders and tors, and a good deal of dry ground underfoot, add to the appeal of these mountains.

Naturally Mount Leinster, as the highest peak in the range is the focal point of attention for hillwalkers. One of the most popular approaches to Mount Leinster is along the east-west ridge from Black Rock

Mountain. Were this development to proceed the experience of hillwalkers following the high ridge between these two summits would be radically altered. In combination with the existing, smaller windfarm on Greenoge, the imposition of seven much larger turbines would industrialise this important mountain landscape.

**2.2 The Blackstairs Walk** - The classic challenge walk in the Blackstairs is to follow the ridgeline all the way from Killnaure near Bunclody, Co. Wexford to Glynn, Co. Carlow, a distance of 31km. While this walk is done by people independently, an organised walk has taken place on this route annually since 1980. The event attracts approximately 200 people each year, a mixture of locals and hillwalkers from all over the country. In addition, approximately 50 volunteers are involved in supporting the event. There is a good relationship between the organisers and the landowners along the route and particularly with the community in Glynn. This event brings activity and income to the area and showcases the beauty of the Blackstairs to a wide range of hillwalkers. The Blackstairs Walk is organised by the Wayfarers, a Dublin-based hiking and mountaineering club. This illustrates very well how a community of interest in a mountain area may not be living in the immediate geographic area.

The proposed development would detract significantly from the experience of people following the route of the Blackstairs walk, as all seven turbines would be prominent in the landscape for the full ascent of Black Rock Mountain and all the way along the ridge to Mount Leinster.

**2.3 Trail Walking** - The South Leinster Way, one of Ireland's 46 National Waymarked Trails passes through the proposed development site. The South Leinster Way forms part of the E8, a European long-distance hiking path of approximately 4,500km from Dursey Island, Co. Cork via the Blackstairs, all the way to Turkey. Part of the Columban Way, Turas Columbanus is a new walking route linking the birthplace of St. Columban, near Myshall, Co. Carlow, with Bangor, Co. Down. As with the South Leinster Way, a section of the route is part of the proposed development site. Based on Chapter 11 of the EIAR these routes would be closed for 12-18 months during construction and walkers will be diverted to an alternative route along the public road.

Mountaineering Ireland notes that the proposed development would result in an 'upgrade' of 2.74km of existing walking track, but there is no information provided as to how the proposed works would actually improve the quality of people's experiences. As shown below, while trails within windfarms may provide accessible exercise, due to the excavations, the enlarged width of forest roads, and the scale and movement of the turbines, it is usually a low-quality recreation experience. Therefore, Mountaineering Ireland categorically rejects the developers' claim (in section 11.11) that the proposed development would '*improve recreation activity at the site and will have a long-term significant positive impact on recreation and amenity.*'

**2.4 Irish Peaks** - In August 2020, Mountaineering Ireland published *Irish Peaks - a celebration of Ireland's highest mountains*. This hardback book (which has already been reprinted twice), describes hillwalking routes on Ireland's highest 100 mountains (<https://mountainviews.ie/lists/highest/>). *Irish Peaks* was published in tribute to the late Joss Lynam, who was instrumental in the establishment of the South Leinster Way and who in 1994 co-authored a booklet titled *Walking in the Blackstairs*. As Ireland's 20<sup>th</sup> highest mountain Mount Leinster is one of the peaks featured in *Irish Peaks* and the published route, which goes between Black Rock Mountain and Mount Leinster, would be adversely impacted by the proposed development.



recreational users and local residents, Mountaineering Ireland believes that the proposed development would be in contravention of Carlow County Council's Tourism, Heritage and Landscape Policies, as set out in the County Development Plan (2015-2021).

**2.7 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>

Research conducted by Ipsos MRBI for Sport Ireland during 2020 showed that greater numbers of people have been enjoying the health and social benefits of physical activity during Covid-19, with record numbers (78%) making recreational walking part of their weekly routine. The research also showed that most people who took up a new activity during Covid-19 intend to continue participating in it into the future. Amongst those who had taken up a new activity, hillwalking (at 18%) was the third most popular activity (Sport Ireland, 2020).

**2.8 Impact of commercial windfarms on the recreation experience** - 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, unnatural appearance 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 Blackstairs and how it could displace recreation activity, with consequent impact for local businesses.

Recreational enjoyment of the Blackstairs mountains is not limited to hillwalkers, trail walkers follow the South Leinster Way, other walkers, runners and fitness enthusiasts take the road from the Nine Stones to the mast on the summit of Mount Leinster. Cyclists regularly use the roads through the Corrabut Gap and by the Nine Stones. Hang gliders and paragliders are a regular sight in the Blackstairs and in this context we note that National Aero Club Ireland has submitted an objection to this application.

Both the recreational and tourist uses of the Blackstairs 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.

### 3. Landscape and Visual Impact

**3.1 Landscape and Visual Impact Assessment** - Mountaineering Ireland has significant concerns in relation to the Landscape and Visual Impact Assessment (LVIA) for the proposed development.

It is our argument that the selection of Viewshed Reference Points was inadequate and that this in turn has downplayed the significance of the visual impact of the proposed development. It appears that 34 of the 37 points selected are on, or adjacent to, public roads. People enjoy and experience Ireland's landscapes from places other than public roads, and it is essential that visual impact is properly considered from this context.

The developers' Visual Impact Assessment (15.3) rightly acknowledges '*The higher levels of sensitivity often related to elevated views from the uplands, which afford vast panoramas over the landscape or alternatively, represent outdoor recreationalists.*' Yet this appears not to have been properly assessed in the LVIA.

Section 15.4.4 describes the process for selecting the Viewshed Reference Points and recognises the need to include Key Views in terms of recreation, as well as Tourism, Recreational and Heritage Features where viewers are likely to be in a reflective or recreational frame of mind, but which viewpoints amongst the 37 selected satisfy these criteria?

**The off-road viewpoints** are VP28 Slieveboy Loop Walk (17.01km from the site), VP33 Mount Leinster (4.48km from the site), and VP37 Vinegar Hill (22.01km from the site).

The inclusion of **VP28 Slieveboy Loop Walk**, near Askamore is utterly disingenuous. The view towards Croaghau from Slieveboy is dominated by Ballycadden windfarm in the foreground, therefore it is hardly surprising that the proposed development has little effect on the view.

**VP33 Mount Leinster** is the only viewpoint included with a view over the development site, it is also the only viewpoint that could be considered to be in hillwalking terrain. Mountaineering Ireland disagrees with the assessment that the significance of visual effect for Mount Leinster is Moderate. Considering the high sensitivity of the landscape on Mount Leinster, and the fact that the viewers, by the nature of their activities, are engaged with the landscape, spend a considerable amount of time on the mountain and are sensitive to changes in the views, it is our assertion that the significance of visual effect should be far greater than Moderate. Based on the photo montages, we further dispute the conclusion of 'medium-low' visual impact.

The developers' conclusion that the proposed turbines would not appear incongruous in this landscape context is derived from fundamentally flawed analysis and defies reason.

Mountaineering Ireland contends that Black Rock Mountain (599m) to the east of Mount Leinster and the popular summit of Slievebawn (520m) which is just over 1km WNW of the Nine Stones should have been included as viewpoints in the LVIA. In addition, there should have been a viewpoint along the South Leinster Way as it approaches from Kildavin.

Considering the visual impact across the wider area, the skyline ridge of the Blackstairs is one of the most distinctive large scale visual element in the entire landscape of the south-east region. The proposed development would disrupt that special skyline view over an extensive area of north Carlow, south Wicklow, Kilkenny and Wexford, which is surely contrary to proper planning.

**3.2 Cumulative Impact Assessment** – The developers seem to present an argument that the existing Greenoge turbines to the east of the site are in harmony with the proposed development, with the marked difference in size between existing and proposed turbines *‘favourably giving an increased sense of space and distance rather than scale confusion’* and, similarly that the proposed development would *‘serve to consolidate and intensify the wind energy development already present on the Greenoge – Croaghaun ridgeline resulting in a combined development that still remains characteristic of medium-sized developments in this area.’*

The combination of these two developments cannot be compared with windfarm developments at lower level in the surrounding countryside, this is an entirely different and much more sensitive landscape setting which does not have the capacity to accommodate a further, larger development.

There would undoubtedly be cumulative impact with the Greenoge and Croaghaun developments visible together from a number of viewpoints, including some of the most sensitive designated views to the south and southwest, such as VP33 Mount Leinster and VP29 the Nine Stones view.

It is Mountaineering Ireland’s assertion that the cumulative impact in the central study area is greater than Medium-Low, that the poor selection of viewpoints has downplayed the cumulative impact and that the proposed development would render wind energy development a defining element in this scenic landscape. This degree of development is incompatible with the capacity statement in the Landscape Character Assessment for the Mount Leinster / Blackstairs Uplands:

*There is low capacity to absorb wind turbines, overhead cables and masts, particularly in the upland areas where they would detract from the scenery and visitors’ experience of ‘wilderness’.*

**3.3 Extent of ZTV map** - Given the scale of the turbines proposed, Mountaineering Ireland was surprised to see that the extent of the ZTV (Zone of Theoretical Visibility) map was only 20km. Although the Wind Energy Development Guidelines (page 94) state that for turbines with a blade tip in excess of 100 metres, a ZTV radius of 20km would be adequate, turbines of the scale proposed for Croaghaun were not envisaged when this guidance was published in 2006. A 20km radius is not in keeping with the Scottish Natural Heritage guidance on the visual representation of wind farms, which is accepted as industry best practice and recommends a radius of 45km where the overall height of turbines is 150 metres or more (*Scottish Natural Heritage (2017)*).

**3.4 Landscape Impact Assessment** – The development site is at a height between 300-400m. Ireland has a very limited stock of mountain land, with just 6% of land area above the 300m contour; this includes Ireland’s least altered landscapes. Ireland’s extremely limited stock of undeveloped mountain



land is irreplaceable and it is being depleted every day. Wildness, remoteness, tranquillity and scenic quality are landscape values associated with the Blackstairs; it is vital that these qualities are protected for the enjoyment of future generations.

The argument that the proposed development would result in minor physical impacts as the land cover has already been modified by conifer plantations fails to recognise that trees, even conifers, are living organisms and fundamentally different to substantially larger industrial structures anchored in place by deep concrete foundations.

Wind turbines are the largest manmade structures being imposed on Ireland's upland landscape, at a scale unprecedented in such settings. The incongruity and prominence of windfarms in upland settings is exacerbated by the movement of the turbine blades and their visibility against the sky across a wide area. Power generation on the scale proposed at Croaghauaun is an industrial use of land. Had the wind industry not long since adopted the benign term '*farm*' it would be far more appropriate to describe this as a wind energy factory. Would this site be considered a suitable location for the construction of any other factory? 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? Green energy should not come at the expense of the quality of our green spaces.

## 4. Planning Context

**4.1 An Board Pleanála decision in 2003** - The application notes note that a windfarm was previously granted on this site (but not constructed). That permission was given by An Bord Pleanála (Ref: 203283, October 2003) in an appeal by Tullow Mountaineering Club, supported by the then Mountaineering Council of Ireland (now Mountaineering Ireland). In granting permission, the Board reduced the number of turbines from 10 to seven, and reduced the height of the turbines, stipulating that they should not exceed an overall height of 87 metres. The reason for these conditions was: '*In the interest of visual amenity and orderly development, having regard to the windfarm permitted on the adjoining site.*'

An Board Pleanála directed in 2003 that the maximum height for a wind turbine on this site should be 87 metres, yet this application proposes turbines that are just over twice that height, and twice that width. It should be abundantly clear that this would be detrimental to the visual amenity of this important landscape.

While the mountains have not changed shape or height since 2003 and the amount of undeveloped mountain land has only decreased, the appreciation of scenic landscapes is stronger now than ever. That concern to protect mountain landscapes is evidenced by the far greater number of objections and the range of groups opposed to the current application. These include the Save Mount Leinster campaign, the Blackstairs Ramblers and the Blackstairs Farming Group, a farmer-led initiative working to sustain farming and farming communities through the sustainable management of the Blackstairs uplands and their hinterlands.

**4.2 Carlow County Development Plan** – The Tourism section of the current Carlow County Development Plan (2015-2021, section 8.0) includes as its first objective the conservation of the natural heritage and protection of sensitive landscapes. The proposed development is clearly not compatible with this objective or with the final point in Tourism Policy 2 (below):

*Tourism – Objective 1*

- *Carlow County Council will promote, encourage and facilitate the development of sustainable tourism through the conservation, protection and enhancement of the built and natural heritage, the protection of sensitive landscapes and cultural and community environments in order to maximise upon the economic benefits arising from the industry.* (page 176)

*Tourism - Policy 2*

- *Protect and conserve those natural, built and cultural heritage features which form the basis of the county's tourism attraction and to seek to restrict development which would be detrimental to scenic and identified natural and cultural heritage assets* (page 192)

The proposed development is also in conflict with the Council's heritage policies as set out in Section *Heritage Policy 1*

- *Protect, manage and enhance the natural heritage, biodiversity, landscape and environment of County Carlow in recognition of its importance as a non-renewable resource, unique identifier and character of the county and as a natural resource asset*
- *Protect and enhance the natural environment of County Carlow and recognise the important role of the environment, through its diversity, quality and integrity, in terms of enhancing the image of the County, quality of life factors and tourism potential for Carlow*
- *Protect designated Views, Prospects and Scenic Routes in the county as appropriate* (page 210)

*Heritage Policy 2*

- *Ensure the recommendations of the Landscape Character Assessment contained within Appendix 6 of this plan be adhered to at all times during the lifetime of this plan* (page 216).

The Plan (page 179) recognises that the Blackstairs Mountains provide the principal touring route in the county and specifically mentions the excellent views from the Nine Stones viewpoint (VP29). The LVIA has judged that the impact of the proposed development on this key viewpoint would be Substantial-moderate in its significance, thus undermining the overall value of the Mount Leinster Heritage Drive.

The Plan explicitly references the Blackstairs Mountains as one of the most important natural attractions in the county as they provide a backdrop for much of the county's surface area (Section 8.4, page 178). The developers refer repeatedly to the existing windfarms to the east and northeast of the development site, inferring that this creates a favourable precedent for this application. Fortunately, the views of the Blackstairs from the west and north-west have not been blighted in this way and it is important that this landscape setting, and the skyline ridge of the Blackstairs is protected for the enjoyment of future generations.

The plan also mentions the forested areas around Mount Leinster, where the proposed development is sited:

*The forested areas immediately surrounding Mount Leinster and the Blackstairs Mountains and southwards of Clashganny, form both a pleasant backdrop and central focus of the South Leinster and Barrow Way long distance walking routes. (Page 180)*

Again, with the addition of seven very large wind turbines the forestry around Mount Leinster would no longer provide such a pleasant backdrop to the Barrow Way.

## **5. Conclusions**

It is Mountaineering Ireland's conclusion that the proposed development would be an unacceptable industrial intrusion into a natural landscape of acknowledged high scenic quality. This would degrade the special landscape of the Blackstairs and detract significantly from the quality of the experiences enjoyed by visitors to the area, especially by hillwalkers on the ridge between Black Rock Mountain and Mount Leinster, by visitors in the area of the Nine Stones and by all those ascending to the top of Slievebawn to savour its panoramic views.

It has been shown that the developers' LVIA is deeply flawed and that the proposed development contravenes the Tourism, Heritage and Landscape policies within the Carlow County Development Plan, leaving us in no doubt that this development 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.

## **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 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 13,900 members, comprising 191 clubs and 2,060 individual members (October 2020).

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