



Irish Sport HQ
National Sports Campus
Blanchardstown
Dublin 15, Ireland

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

The Secretary,
Planning Department,
Wicklow County Council,
County Buildings,
Whitegates,
Wicklow Town,
Co. Wicklow

2nd March 2021

Re: Planning Application no. 2160 - ABO Wind Ireland Ltd. - Kilranelagh Windfarm

Dear Sir/Madam

Mountaineering Ireland* submits the following observations on the above planning application.

1. Introduction and context

As the national representative body for hillwalkers 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. One of Mountaineering Ireland's strategic objectives is to be a voice for the protection of mountain landscapes. Mountaineering Ireland therefore represents a community of interest in this application drawn from County Wicklow and across the island of Ireland.

Mountains and upland areas 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.

Mountaineering Ireland submits these comments from the context of supporting the principle of sustainable, renewable energy development. It is the location, 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.

Directors: P. Barron; I. Buckley; N. Caffrey; T. Kane; P. Kellagher; C. Mahon; M. Maunsell;
G. McLaughlin; K. O'Callaghan; C. O'Connor; D. Pollard; G. Thomas.

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Registered Office: Irish Sport HQ, National Sports Campus, Blanchardstown, Dublin 15.

The proposal is for a development comprising five wind turbines with an overall height of up to 165m, within an area of private forestry on Kilranelagh Hill, on the southern side of the Glen of Imaal. The site is just 1.5km west from the summit of Keadeen Mountain, a prominent and distinctive peak on the western side of the Wicklow Mountains.

Mountaineering Ireland's main concerns in relation to this application relate to its impact on the landscape resource of the Wicklow Mountains and the Glen of Imaal area in particular, and to how the proposed development would impact on the experience of recreational users, particularly hillwalkers and climbers. Mountaineering Ireland also has concern that due to its archaeological importance Kilranelagh is not a suitable location for an industrial development such as that proposed.

2. Hillwalking and climbing in the Glen of Imaal

Given the location of the proposed development site, Mountaineering Ireland is greatly concerned that the developers have made no attempt to assess the impact of the proposed development on hillwalkers and climbers in the Glen of Imaal and west Wicklow area.

2.1 The Glen of Imaal - The Glen of Imaal is defined by a ring or horseshoe of hills around the Slaney river valley, with higher ground to the east and Wicklow's highest mountain, Lugnaquilla (925m) at its apex. Kilranelagh Hill forms part of that horseshoe, sitting at the junction between Keadeen Mountain and the hills further west. Much of the eastern part of the Glen has been a military training area since approximately 1900. This has been beneficial to the landscape of the Glen of Imaal as it has curtailed development over the last century.

The ascent of Lugnaquilla, particularly via Camarahill, is a key attraction for many hillwalkers and climbers visiting the Glen of Imaal. In cold winters the steep gullies draw mountaineers to Lugnaquilla to climb winter routes. There is a long tradition of hillwalkers making circuits of the mountains that surround the Glen, a tradition epitomised by the Ring of Imaal Challenge Walk. The Ring of Imaal has been organised under the auspices of An Óige, in cooperation with local landowners, on a biennial basis since 1981. The proposed development would detract significantly from the experience of people following the route of the Ring of Imaal walk, as the turbines would be a dominant element in the landscape on the ascent of Keadeen and views of the windfarm would be experienced repeatedly throughout the latter half of the walk from Lugnaquilla around to the foot of Pinnacle mountain, just 2km east of Donard.

Other mountains in the area such as Keadeen, Ballinceddan, Camenablogue Table Mountain, Sugarloaf and Church Mountain are frequently climbed individually as well as part of longer hikes. With the sole exception of Ballinceddan, the windfarm proposed for Kilranelagh Hill would be disruptive to the views enjoyed from all these mountains. It is important to appreciate that it is the mountains themselves and their landscape setting which inspire, shape and enrich the recreation experiences enjoyed by hillwalkers, climbers and other recreational visitors. The landscape of the Glen of Imaal is a major environmental, cultural and recreational asset which must be protected for the enjoyment of current and future generations.

2.2 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

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 Wicklow Mountains and how it could displace recreation activity, with consequent impact for local businesses.

The pressure of visitor numbers in the Laragh/Glendalough area is such that Fáilte Ireland has commissioned a Visitor Management Masterplan, which seeks to improve the geographic and seasonal spread of visitors across County Wicklow. The imminent development of the Blessington eGreenway, and the potential for sustainable heritage tourism associated with the Baltinglass hillfort complex, both present opportunities for increased tourism activity in west Wicklow. This is something that businesses, towns and villages in west Wicklow have been seeking for decades.

Both the recreational and tourist uses of the Wicklow 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.

4. Landscape and Visual Impact

Landscape issues and visual impacts are generally perceived to be the key impact of wind turbines. Mountaineering Ireland has very significant concerns in relation to the Landscape and Visual Impact Assessment (LVIA) for the proposed development.

4.1 Landscape Impact Assessment

4.1.1 - Landscape sensitivity - The proposed development site is in the ‘Areas of High Amenity’ landscape category in the Wicklow County Development plan. The ‘Areas of High Amenity’ is divided into five landscape areas. The site is within the ‘Transitional Lands’ area, immediately south of the ‘Baltinglass Hills’ area. Keadeen Mountain, 1.5km east of the site is part of the Wicklow Mountain Area of Outstanding Natural Beauty (AONB), the highest category in Wicklow’s Landscape Character Assessment due to the very high vulnerability of these lands to development. The AONB extends down to the road only a few hundred metres east of the proposed development site.

In consideration of the heritage assets on Kilranelagh Hill, and the fact that the proposed development site is integral to the Baltinglass Hill Fort complex, it is anomalous that the development site is not included in the

Baltinglass Hills area, nonetheless the development site forms part of the setting for the Baltinglass Hills area, which requires consideration in assessing this application.

Mountaineering Ireland does not accept the developer's judgment of Medium landscape sensitivity for this site and its immediate surrounds (<5km), as this includes all of Keadeen Mountain (part of the Mountain Uplands AONB) and most of the Baltinglass Hills area. Neither does it reflect the very significant archaeological and heritage importance of Kilranelagh Hill itself, despite the developers' claim that this is accounted for.

4.1.2 Magnitude of Landscape Effects - The argument that the proposed development would result in minor physical impacts in the site area as the land cover has already been modified by forestry fails to recognise that trees are living organisms and fundamentally different to substantially larger industrial structures anchored in place by deep concrete foundations. Given the shallow soils overlaying bedrock on this site, physical disturbance would appear to be an inevitable consequence of construction activity.

In relation to the landscape level impacts of the proposed development, there is much flawed reasoning in this section of the EIAR. The developers acknowledge that:

For most commercial wind energy developments, the greatest potential for landscape impacts to occur is as a result of the change in character of the immediate area due to the introduction of large-scale structures with moving components.

They mention the two existing windfarms in the study area (Cronelea and Ballycumber) as being in a relatively discrete landscape setting, then bizarrely go on to state:

However, after two decades of wind energy development in Ireland's rural and upland landscapes, wind farms can no longer be described as an unfamiliar or uncharacteristic feature of any such landscape.

This flawed reasoning continues:

Although the wind farm represents a stronger anthropogenic imprint and level of built development than currently exists on the site, it will not detract significantly from its relatively remote, upland character. This is on the basis that wind farms are regularly located in remote areas and have become somewhat synonymous with such locations.

Mountaineering Ireland categorically rejects this bullish attempt to claim all of Ireland's upland areas as being suitable and appropriate places for wind energy development. It is true that many upland areas have been targeted by developers, in part for wind for their higher wind speeds, but arguably because there are fewer local residents to object to such proposals.

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. 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 across a wide area. Mountaineering Ireland would not want to see windfarms becoming a characteristic feature of upland landscapes, as the developers erroneously suggest they already have.

Power generation on the scale proposed for Kilranelagh is an industrial use of land. Had the wind industry not long since adopted the benign term ‘farm’ it would be far more fitting 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.

Mountaineering Ireland does not accept that the proposed development could be ‘comfortably assimilated into this broad landscape context without undue conflict’. Although the number of turbines may be modest, their scale is not. At an overall height of up to 165m, they are taller than any wind turbines that Mountaineering Ireland is aware of currently existing on the island of Ireland. There is simply no way to hide wind turbines of this scale in such a sensitive landscape. We therefore disagree with the developers’ assessment of Magnitude of Effect for the central study area (Medium), and for distances beyond 5km (Low and Negligible).

4.1.3 Significance of effect – As significance of effect is a function of landscape sensitivity weighed against the magnitude of the landscape effect, not surprisingly the developers have found the significance of landscape impact to be Moderate, which Mountaineering Ireland disputes for the reasons given above.

Mountaineering Ireland further draws the attention of the planners to the final claim in this section of the EIA:

Whilst landscape sensitivity is higher within the core of the Wicklow Mountains AONB, the proposed wind farm is at a considerable physical and contextual remove from this area and will not unduly detract from its integrity or key scenic and naturalistic landscape values

The site of the proposed development is only a few hundred metres from part of the AONB at the foot of Keadeen Mountain, the LCA does not define a ‘core’ area within the AONB, therefore the integrity of Keadeen’s landscape should be accorded the same degree of protection as other parts of the AONB. It should be noted too that the proposed development forms part of the landscape setting for other parts of the AONB, especially the mountains on the northern side of the Glen of Imaal.

4.2 Visual Impact Assessment

4.2.1 selection of viewpoints - 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 in the Glen of Imaal area and 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).

It appears that 21 of 24 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.

In Section 9.5 LVIA Methodology, the developers quote the IEMA Guidelines for Landscape and Visual Assessment, acknowledging that the visual receptors most susceptible to changes in views and visual amenity include:

- *People, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focussed on the landscape and on particular views;*
- *Visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience;*
- *Communities where views contribute to the landscape setting enjoyed by residents in the area;*

These visual receptors are poorly represented in the selection of viewpoints. It is our argument that the selection of Viewshed Reference Points was inadequate and not in accordance with the Methodology set out in Section 9.5 of the EIA, and that this in turn has masked the significance of the visual impact of the proposed development.

We note that two viewpoints on the Wicklow Way have been included, VP8 Wicklow Way at Slieveroe and VP16 Wicklow Way at Muskeagh. Both are somewhat distant from the site at 13.6km and 17.6km respectively. Mountaineering Ireland appreciates that there are not many marked walking routes in the Glen of Imaal area, however there are many informal hillwalking routes in the area with levels of usage that compare favourably with the Wicklow Way. One of these is the eastern approach to Keadeen Mountain.

4.2.2 Keadeen Mountain - The omission of Keadeen Mountain from the LVIA is shocking, indefensible and clearly deliberate. Keadeen is a popular summit amongst hillwalkers, runners, and local residents including a lot of family groups. It has heritage value due to the national monument on the summit. It is also the best vantage point to appreciate the network of hillforts in the Baltinglass area. With the cursus monument on the western side of the mountain and the alignments discovered in recent years, it is becoming clearer that Keadeen is integral to this important complex. The Strava heat map for Keadeen in Appendix 1 provides an indication of the popularity of this route in comparison with the two points on the Wicklow Way that were included in the LVIA.

Were this development to proceed, the visual impacts from the summit of Keadeen would be **profound**, due to the sensitivity of the receptors noted above and the very high magnitude of effect. The windfarm would be a major intrusion to the central part of the vista from the summit, distracting from the harmony and coherence of this very special landscape. It is not only the large scale of the turbines and their movement which would degrade the view, but also the widening of existing forest tracks, the addition of 1.5km of new site tracks (or roads), and the addition of large hard stand areas – all would be highly visually intrusive from the summit of Keadeen.



Figure 1: Photo taken from the burial cairn on Keadeen's summit looking down on the development site, with Kilranelagh Hill on left and Brusselstown Ring on right.

4.2.3 Table Mountain Walking Trail - VP12 Table Mountain Walking Trail is included as being representative of a recreational amenity feature, this is certainly a suitable route to assess, however the actual viewpoint chosen is low down on the route, at 400m altitude. Table Mountain itself is 701m altitude and Table Track continues up to a height of approximately 680m.

As one ascends on Table Track the character of the landscape changes to have greater qualities of wildness, remoteness and tranquillity. The extent of the Glen of Imaal and its undeveloped character can be better appreciated. In particular, the way that the Glen is defined by a horseshoe of hills is more obvious, with Kilranelagh Hill being part of that defining feature.

The assessment notes that the turbines will be visible at modest but noticeable scale, filling the space between Keadeen Mountain and Spinans Hill, yet it goes on to conclude that the significance of visual effect is Low. This is surprising given the high sensitivity of people engaged in outdoor recreation activities such as hillwalking which focus on the landscape, and how the windfarm will be an intrusive and distracting element in a key part of the landscape.

In addition to those concerns, Mountaineering Ireland's reiterates that the actual location selected was not suitable to represent the effect the proposed development would have on the experience of hillwalkers and others engaged in outdoor activities on Table Track. A point higher up the track, or Table Mountain itself should have been used.

4.2.4 Other vantage points in the Glen of Imaal - Mountaineering Ireland contends that in addition to Keadeen Mountain, Sugarloaf (552m), 8km NE of the site, and at least one other summit, possibly Table Mountain (701m, 11.5km NE from the site), Camenabologue (758m, 11km NE from the site), or Church Mountain 12km north of the site should be assessed. The mountains around the Glen of Imaal are key features in the landscape and all attract people on a daily basis.

Leitrim Graveyard in the Glen of Imaal (less than 7km NE of the site) is another glaring omission, as a site with historic, cultural and spiritual value.

4.2.5 Cumulative Impact Assessment - In relation to the assessment of cumulative impact, it is notable that people ascending Keadeen Mountain by the most popular route from the east will experience sequential views of Ballycumber windfarm, and to a lesser extent Cronela windfarm, followed by the dominant visual impact of this proposed development on reaching the summit.

It is also common for walkers to approach Keadeen from Carrig, its neighbouring summit to the south, this previously scenic journey would be degraded by sequential views of Kilranelagh windfarm. Due to the inexplicable omission of Keadeen Mountain from the LVIA, these examples of cumulative impact have not been identified by the applicants.

4.2.6 Extent of ZTV map - Given that Section 9.4 of the EIAR states that 'Visualisations and mapping supporting the Landscape and Visual Impact Assessment were prepared in accordance with the Scottish Natural Heritage (SNH) *Visual representation of wind farms: Best Practice Guidelines*', Mountaineering Ireland was surprised to see that the extent of the ZTV (Zone of Theoretical Visibility) maps was only 20km. The SNH guidance recommends (in paragraph 48) a radius of 45km where the overall height of turbines is 150 metres or more (*Scottish Natural Heritage (2017)*).

Although Ireland's 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 Kilranelagh were not envisaged when this guidance was published in 2006. This smaller study area underplays potential impacts which reach right into the Wicklow Mountains and Blessington Lakes etc. A study area of 30km distance (60km diameter) would be more appropriate in such a sensitive location.

5. Archaeology and Cultural Heritage

Kilranelagh Hill is part of a dense concentration of Neolithic and Bronze Age hillforts in the Baltinglass area. In addition to nine hillforts, there are cairns, graves, standing stones, and stone circles. Together these make a landscape so important that archaeologists and historians consider it on a par with the Boyne Valley and a possible candidate for World Heritage Site status.

For thousands of years Kilranelagh Hill has been a burial site with Kilranelagh Graveyard amongst the oldest continually functioning burial sites in the world, and possibly the oldest in Europe.

Chapter 12 of the EIAR provides an inventory of over 100 protected monuments within 2km of the proposed development site, one of these, Boleycarrigeen stone circle, is within the development site. The two large upright stones which form the entrance to this circle face the rising sun as it moves along the upper slopes of Keadeen mountain during the Summer Solstice. Connections such as this between the monuments in the Kilranelagh / Baltinglass Hills area and physical features in the landscape are still being discovered.

Mountaineering Ireland emphatically rejects the developers' conclusion (below) that a moderate impact on the setting of such a wealth of nationally important monuments' is somehow acceptable.

With respect to the significance of the immediate and wider historic landscape, it is acknowledged that there will be a moderate impact on the setting of nationally important monuments for the duration of the operational stage of the wind farm (of 30 years).

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. With such a cavalier attitude to Ireland's national heritage, the applicants' commitments to develop a heritage trail and facilitate guided tours to promote an understanding the significance and importance of the archaeological heritage of this area is utterly unconvincing.

Mountaineering Ireland calls on Wicklow County Council to protect this precious site from industrialisation and to take measures to ensure that is cared for, studied and celebrated in a way that will help local residents and visitors appreciate why this place held such importance to people for thousands of years.

6. Planning Context

Mountaineering Ireland believes that the proposed development would be in contravention of Wicklow County Council's Landscape Heritage Tourism, and Policies, as set out in the County Development Plan (2016-2022). It is clear that the intention of the Development Plan and is to protect the integrity of Wicklow's important landscapes and heritage sites.

In the Wind Energy Strategy (Appendix 6 to Wicklow County Development Plan) the proposed development is within a large area of the county that is considered to be **Less Favoured** for Wind Energy Development.

Wind farm development will be considered, but the sensitivities revealed in these areas would render exploitation more problematic and therefore these areas are less favoured for wind energy development

The Wind Energy Strategy requires that a detailed assessment of the Landscape and Visual Impact is prepared for all applications. As made clear in Section 3 above, it is Mountaineering Ireland's position that the LVIA for this proposed development is fundamentally flawed and therefore downplays the landscape impacts of the proposal.

The potential impact of the project on built heritage, including archaeological sites, also has to be considered. This is a particularly significant consideration for this site.

The Landscape Assessment (Appendix 5 to Wicklow County Development Plan 2016-2022) includes as Key Development Consideration **5.3.8**:

In order to protect views towards the natural hill formations, development within or surrounding the Baltinglass Hills landscape area should be sited in a manner which avoids intrusions on ridge lines or impacts negatively on the natural sky-line.



It is Mountaineering Ireland's assertion that the application is not compatible with the Council's Archaeology Objectives, particularly the following objectives from Chapter 10 – Heritage of the Wicklow County Development Plan 2016-2022:

***BH1** No development in the vicinity of a feature included in the Record of Monuments & Places (RMP) will be permitted which seriously detracts from the setting of the feature or which is seriously injurious to its cultural or educational value.*

***BH5** To protect the Hillforts in west Wicklow and to engage with the relevant central Government department to seek to undertake a detailed study of their importance.*

The proposed development also appears to be in conflict with the Council's Tourism and Recreation policies, specifically:

***Principle 4:** Strategic tourism assets – including special landscapes, important views, the setting of historic buildings and monuments, areas of cultural significance and access points to the open countryside, should be safeguarded from encroachment by inappropriate development (Chapter 7 – Tourism and Recreation, County Development Plan 2016-2022).*

7. Conclusions

It is Mountaineering Ireland's conclusion that the proposed development would be an unacceptable industrial intrusion into a landscape of high scenic quality and international archaeological importance. The proposed development would greatly diminish the quality of current and future recreation experiences on the mountains around the Glen of Imaal, thereby undermining the economic benefit that recreation and tourism bring to the area. The amenity value of these mountains far outweighs this commercial opportunity.

Mountaineering Ireland has shown that the developers' case, particularly the LVIA, is built on flawed foundations and misleading statements. This application needs to be seen for what it is – an opportunistic attempt to profit from the industrialisation of a sparsely populated, scenic and historic landscape. Inappropriate applications such as this reflect badly on the renewable energy sector as a whole.

The proposed development would impact the integrity of the Wicklow Mountains in general and set a damaging precedent. Therefore, Mountaineering Ireland is strongly of the view 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.

Yours sincerely

Helen Lawless
Access & Conservation Officer



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).

For queries or further information please contact:

Helen Lawless, Mountaineering Ireland, Irish Sport HQ, National Sports Campus, Blanchardstown, Dublin 15.

Phone: +353 1 6251115, email: helen@mountaineering.ie, website: www.mountaineering.ie

References

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Appendix 1 - Strava Heatmap images

Strava heatmaps provide an indication of levels of activity amongst users of the Strava app. Strava users are more likely to be runners and fitness enthusiasts, so not representative of the general population of recreational users, nonetheless it is useful for identifying popular routes and comparing the level of activity between routes.



Keadeen (note approach to summit from east)



VP8, Wicklow Way Slieveroe



VP16, Wicklow Way at Muskeagh

Images from <https://www.strava.com/heatmap>, accessed 27th February 2021.