



Irish Sport HQ
National Sports Campus
Blanchardstown
Dublin 15

14 March 2014

Committee for the Environment
Room 247
Parliament Buildings
Ballymiscaw
Belfast
BT4 3XX
Northern Ireland

Re: Inquiry into Wind Energy

Dear Sir / Madam,

Mountaineering Ireland is the representative body for walkers and climbers on the island of Ireland, and is recognised as the governing body for all aspects of mountaineering by Sport Northern Ireland and the Irish Sports Council. Mountaineering Ireland's mission is to represent and support the walkers and climbers of Ireland and to be a voice for the sustainable use of Ireland's mountains and hills and all the places (coastline, crags, forests) we use.

Renewable energy developments can have a significant impact on the landscape and detract from the experience of recreational users in upland areas; consequently we welcome the opportunity to respond to the terms of reference for the Inquiry into Wind Energy. In this brief submission we have outlined some overarching comments and provided evidence in response to the terms of reference:

1. Overarching comments

Mountaineering Ireland submits these comments from the context of supporting the principle of sustainable, renewable energy developments within Northern Ireland. While admittedly starting from a low base, renewable energy generating capacity increased ten-fold in Northern Ireland between 2003 and 2011 (Cowell et al, 2013). In 2011 92% of electricity generated from renewable energy in Northern Ireland came from onshore wind and this proportion has continued to increase since, exacerbating an over-reliance on onshore wind energy (NI RIG, 2012, p18). Mountaineering Ireland believes that a policy of energy conservation, coupled with a diversity of renewable sources, particularly offshore and supported, community scale schemes that deliver power directly, provide a more appropriate approach to meeting future energy needs.

Northern Ireland has a very limited stock of relatively wild and undeveloped natural landscape; mountains, moorlands and heaths cover about 12% of Northern Ireland's land surface, compared with the UK average of 18% (UK NEA, 2011, p106). The character of much of this 12% has already been altered by development; we are using up this vital resource at an unsustainable rate. Wind energy developments can have a severe impact, imposing a large-scale industrial use onto semi-natural landscapes. Power lines and roads to service the site add to the visual intrusion. The construction, operation and decommissioning of windfarms causes disturbance to

Directors: P. Barron, D. Batt, F. Bradley, N. Hore, U. MacPherson,
M. McKeever, R. Millar, I. Sorohan, U. Vejsbjerg, S. Walsh

Mountaineering Ireland is a company limited by guarantee. Registered in Dublin, number 199053.
Registered Office: Irish Sport HQ, National Sports Campus, Blanchardstown, Dublin 15, Ireland

the local community, recreational users, wildlife, hydrology and an irreversible change to the physical landscape. Wind turbines also bring large scale mechanised movement to a naturally still environment.

Mountaineering Ireland challenges the apparent presumption towards siting wind farms in upland areas. While the preferred location for wind turbines was traditionally in locations on higher ground, advances in turbine technology (especially scale and blade design) now allow efficient wind turbines to be located in lower-lying areas (Heritage Council, 2013). Wind turbines sited on cut-away bogs would have less prominence within the landscape than turbines in uplands areas. Wind turbines located within large industrial sites (active or disused) would also appear less incongruous, and their proximity to the grid would result in greater efficiency and reduced cost.

The total installed windfarm capacity in Northern Ireland in December 2013 was over 531MW, which equates to 345,410 homes being powered (NI RIG, 2014). This in turn is very close to half of all the households in Northern Ireland, as identified in the 2011 Census. With such a significant amount of wind generation already online, and more that has been approved, but is not yet visible on the landscape, it is appropriate, and we would argue necessary, to review Northern Ireland's renewable energy policy. The Inquiry into Wind Energy is therefore timely.

2. The adequacy of PPS18 and related guidance

While PPS18, and its supporting guidance, include many positive and reassuring statements, the policy is underpinned by a presumption in favour of development, evidenced in the extract below:

'The wider environmental, economic and social benefits of all proposals for renewable energy projects are material considerations that will be given significant weight in determining whether planning permission should be granted' (Policy RE1: Renewable Energy Development)

Planning consent rates for renewable energy development in Northern Ireland (at almost 90%) are significantly higher than other UK jurisdictions. Recent research by Cardiff University attributed this high rate of planning consent largely to PPS18 taking a more liberal criteria-based approach than what is used elsewhere in the UK, and went on to describe the Northern Ireland approach to planning as 'far more relaxed compared to other parts of the UK'.

A further weakness in PPS18 is that it does not preclude renewable energy developments within Northern Ireland's eight Areas of Outstanding Natural Beauty (AONBs), the Giant's Causeway World Heritage Site and the Marble Arch Caves Global Geopark. This weakness has been highlighted through the recent approval of two substantial windfarms with Binevenagh AONB (Dunmore and Dunbeg). The evidence from the Sperrins AONB is even more stark; 49% of Northern Ireland's industrial wind turbines are in west Tyrone, a number of these within the AONB and the others in its hinterland. Further developments are currently proposed for the area, including a 14-turbine windfarm at Lisnaharney near Omagh which affects two public rights of way and would ruin the character of the popular Robbers Table walk. There is no evidence in this area of either 'the

Directors: P. Barron, D. Batt, F. Bradley, N. Hore, U. MacPherson,
M. McKeever, R. Millar, I. Sorohan, U. Vejsbjerg, S. Walsh

Mountaineering Ireland is a company limited by guarantee. Registered in Dublin, number 199053.
Registered Office: Irish Sport HQ, National Sports Campus, Blanchardstown, Dublin 15, Ireland

consideration of cumulative impact' advocated in PPS18 (RE1), or the 'cautious approach' in relation to designated landscapes recommended in the Best Practice Guidance (1.3.23).

Given that Northern Ireland does not have National Parks we need to ensure stronger protection for our AONBs and other scenic landscapes. Due to the prominence of wind turbines within the landscape this should include a buffer zone around AONBs and other important landscapes.

With a new planning regime imminent, it is essential that a strong Northern Ireland-wide policy is in place to protect undeveloped and semi-natural landscapes. While these landscapes deserve to be protected for their own value, it is notable that Northern Ireland's landscape is a key attraction for visitors, and therefore is integral to our tourism industry. The quality of our landscape also plays a role in the health and well-being of Northern Ireland's citizens. It is Mountaineering Ireland's view that a renewal of Northern Ireland's Landscape Character Assessment is required, as well as the development of a Landscape Strategy for Northern Ireland. These would provide clear parameters for the preparation of development plans and council decision-making on planning applications for renewable energy developments.

3. Separation distances

Mountaineering Ireland is opposed to any increase in the set-back distances currently included in PPS18. With Northern Ireland's dispersed population, increasing the separation distance between turbines and occupied property would intensify the pressure for development in our limited remaining areas of undeveloped and semi-natural land. As stated in Section 1, Mountaineering Ireland believes that wind turbines are more appropriate within large industrial sites, than in natural landscapes. In addition to the existence of large structures, noise, shadow etc. are inherent to the industrial environment.

4. Community engagement

As the representative body for the largest recreation user group in Northern Ireland's upland areas, Mountaineering Ireland represents a strong community of interest in these areas. Community engagement is typically taken to refer to the local geographic community; we would assert that significant communities of interest should also be consulted.

The Wind Inquiry should give serious consideration to how transparency can be ensured in the relationship between developers and community groups. A public register of community benefits would be helpful. Mechanisms to facilitate community ownership of renewable energy developments should also be explored.

In the current economic situation, there is a tendency in Northern Ireland to accept development in the hope of providing employment, particularly in rural areas. Renewable energy developments, particularly windfarms, generate very little employment, and where there is employment, it may not be for local people. A recent study from Scotland concluded that for every job created in the UK in renewable energy, 3.7 jobs are lost (Marsh and Miers, 2011). While this may be just one report, it shows that the economics of the renewable energy industry are questionable, and that significant public investment is being made in private industry. This is beyond the scope of Mountaineering Ireland's interest, however we urge the Inquiry to examine the economics of the wind energy industry.

Directors: P. Barron, D. Batt, F. Bradley, N. Hore, U. MacPherson,
M. McKeever, R. Millar, I. Sorohan, U. Vejsbjerg, S. Walsh

Mountaineering Ireland is a company limited by guarantee. Registered in Dublin, number 199053.
Registered Office: Irish Sport HQ, National Sports Campus, Blanchardstown, Dublin 15, Ireland

5. Closing remarks

Mountaineering Ireland welcomes the Inquiry into Wind Energy; sadly we have reached a point in Northern Ireland where it is now clearly evident that there is need for greater protection for our undeveloped and semi-natural landscapes, particularly in upland and coastal areas.

The small area of undeveloped upland landscape or wild land which remains in Northern Ireland is a priceless natural asset, the enjoyment of which for recreation and other sustainable uses, is vital to the physical, mental, recreational, emotional and spiritual well-being of our people as a whole. This natural capital should not be squandered by the imposition of windfarms (which could be sited elsewhere in more appropriate and less damaging locations) in those vulnerable and precious places. Strong policy is required quickly to achieve better balance between the business goals of a small number of private developers and the long-term public interest. Within this policy Mountaineering Ireland would like to see a greater focus on energy conservation, off-shore and other renewable technologies such as tidal, wave and solar.

Mountaineering Ireland only became aware of this consultation recently. We wish to register our interest in: renewable energy development in natural environments; outdoor recreation and the protection of Northern Ireland's natural and semi-natural landscapes. We ask to be included in any future consultations that may be relevant.

Yours sincerely,



Karl Boyle

Chief Executive Officer

References:

Cowell, R. et al (2013) *Promoting Renewable Energy in the UK - What Difference has Devolution Made?*, published by Cardiff University, see: <http://cplan.subsite.cf.ac.uk/cplan/sites/default/files/DREUD-FullReport.pdf>.

Heritage Council (2013), *The Onshore Windfarm Sector in Ireland – Planning in Harmony With Heritage*, published by the Heritage Council, Kilkenny, see: http://www.heritagecouncil.ie/fileadmin/user_upload/Planning/2013/Recommendations.pdf

Directors: P. Barron, D. Batt, F. Bradley, N. Hore, U. MacPherson,
M. McKeever, R. Millar, I. Sorohan, U. Vejsbjerg, S. Walsh

Mountaineering Ireland is a company limited by guarantee. Registered in Dublin, number 199053.
Registered Office: Irish Sport HQ, National Sports Campus, Blanchardstown, Dublin 15, Ireland



Irish Sport HQ
National Sports Campus
Blanchardstown
Dublin 15

Marsh, R. & Miers, T. (2011) *Worth The Candle? The Economic Impact of Renewable Energy Policy in Scotland and the UK*, published by Verso Economics, Kirkcaldy, Scotland, see: <http://www.acci.asn.au/Files/Worth-The-Candle---The-Economic-Impact-Of-Renewabl>

NI RIG (2012) *The economic effects of increasing wind deployment in Northern Ireland*, published by Northern Ireland Renewables Industry Group, see: http://www.ni-rig.org/wp-content/uploads/2012/07/Redpoint_NIRIG-NI-wind-report_final_20120329-2.pdf

NI RIG (2014) *NI Wind Energy Sector Announces Record-breaking Year*, published by Northern Ireland Renewables Industry Group, see: <http://www.ni-rig.org/wp-content/uploads/2012/08/Press-release-NIRIG-14-conference-FINAL-2.pdf>.

UK NEA (2011) *The UK National Ecosystem Assessment: Chapter 5 – Mountains, Moorlands and Heaths*, published by UNEP-WCMC, Cambridge, see: <http://uknea.unep-wcmc.org/Resources/tabid/82/Default.aspx>

Directors: P. Barron, D. Batt, F. Bradley, N. Hore, U. MacPherson,
M. McKeever, R. Millar, I. Sorohan, U. Vejsbjerg, S. Walsh

Mountaineering Ireland is a company limited by guarantee. Registered in Dublin, number 199053.
Registered Office: Irish Sport HQ, National Sports Campus, Blanchardstown, Dublin 15, Ireland