



Irish Sport HQ
National Sports Campus
Blanchardstown
Dublin 15

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

12th December 2013

Re: planning application no. 138844

Galetech Energy Developments Ltd, Butter Mountain, Manor Kilbride, Co. Wicklow

Dear Sir/Madam

On behalf of Mountaineering Ireland I have attached comments on the above planning application.

My colleague Helen Lawless will phone your office shortly to make payment of the €20 fee to lodge this comment.

Yours sincerely

Karl Boyle

Chief Executive Officer



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Re: Planning Application No. 138844

Gaitech Energy Developments Ltd, Butter Mountain, Manor Kilbride, Co. Wicklow

Dear Sir/Madam

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

1. Introduction and context

Mountaineering Ireland, as the representative body for walkers and climbers in Ireland, has a particular interest in the upland environment - hills, mountains, forests, bogland, sea cliffs and associated areas. While limited in their extent, the uplands are very significant elements in Ireland's landscape, providing defining geographic features, some of our most beautiful scenery and our largest areas of relatively wild land.

People are drawn to wild and beautiful landscapes as a counterbalance to everyday life, for contact with nature, and for a physical challenge. Ireland's upland areas deliver a host of recreation opportunities, with associated economic and well-being benefits. Ireland has a very limited stock of undeveloped land, and we are using this up at an alarming rate. It is Mountaineering Ireland's assertion that protecting the natural and undeveloped character of Ireland's upland environment should be a key concern within the planning process. Mountaineering Ireland does not oppose all development in upland areas, rather it argues that development should be located where it does not destroy the essential character of the undeveloped landscape of the upland and coast.

This observation is also submitted from the context of supporting the principle of sustainable, renewable energy developments within Ireland. Mountaineering Ireland believes that a national policy of energy conservation, coupled with a diversity of renewable sources, particularly off-shore stations and supported, community-scale schemes that deliver power directly, provide a more effective approach to meeting future energy needs.

Directors: P. Barron; D. Batt; F. Bradley; N. Hore; U. MacPherson; R. Millar;
R. Ó Conchúir; P. O'Sullivan; I. Sorohan; D. Stelfox, U. Vejsberg; S. Walsh; A. Tees.
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Registered Office: Irish Sport HQ, National Sports Campus, Blanchardstown, Dublin 15

This is the first significant wind farm proposal located very near to, and accessible from the city of Dublin. It is in the area which absorbs the immediate recreational pressures from the city and where landscape degradation in the uplands by industrial development will have a significant negative impact on the enjoyment of the countryside by a variety of recreationalists. Mountaineering Ireland is of the strong opinion that the proposal is undesirable from a visual and long-term planning point of view and is contrary to the proper planning and sustainable development of the uplands in the immediate environs of Dublin.

2. Observations on the proposed development

2.1 Visual intrusion

The proposed wind farm is located on one of the most visible and prominent hilltops in the Dublin and Wicklow Mountains. Butter Mountain forms a corner of the Dublin hills and is the foreground to the Seechon-Seeffingan-Seefin group of mountains (all of which carry important early archaeological sites). The site location is highly visible from the west, in particular from the main N81 road, a heavily trafficked tourist route, as well as from the Dublin suburbs of Tallaght, Saggart and Rathcoole. The site of the proposed wind farm will also form a foreground to the whole Dublin-Wicklow mountain massif when viewed from the Dublin-Limerick motorway (M7) and the general west Wicklow area. Nine turbines, each with a height of up to 126 metres, constitute a major discordant element in this upland landscape where there is no precedent for such development and will be highly injurious to the visual amenity of this area located in the immediate recreational catchment of Dublin city. The proposed site will be highly prominent and visible to observers using the (recently resurfaced) Ballinascorney to Shankill road to the north-east, which is a popular tourist route giving extensive views of the flat lands of west Wicklow, Kildare and the central plain that will now be marred by the proposed wind farm on Butter Mountain.

This injury to visual amenity is significantly exacerbated by the industrial nature of the proposed use as a power generating station in a strongly rural and agricultural landscape which is also used for recreational purposes for, inter alia, walking, hiking, orienteering, horse riding and official motorcycle trials. The incongruity and prominence of the windfarm in this scenic landscape will be exacerbated by the movement of the turbine blades, as well as the service roads and other infrastructure that accompany wind turbines.

The proposed development will impact negatively on the views experienced by walkers and other recreationalists using the adjacent Seechon- Corrig-Seeffingan-Seefin group of hills as it forms a focal point for this very popular horseshoe walk. The cluster of passage tombs and cairns on these hills are direct evidence that that this area has been important to people for thousands of years. The Butter Mountain windfarm would alter the character of this historic landscape to an unacceptable degree.

The large quarry at Aghfarrell adjacent to the subject site cannot be cited as precedent for visual intrusion in this rural area as it is well concealed by its own vegetated spoil heaps, mature conifer plantation and its location below the ridge or skyline of Butter Mountain. This quarry is difficult to identify in the landscape when viewed from the N81 or, indeed, from most viewpoints within a kilometre of its location.

There is also likely to be injury to the residential amenities of people living on the Ballyfolan Road by reason of the over-dominant visual intrusion of the proposed turbines, their movement and noise.

2.2 Loss of undeveloped upland landscape

Mountaineering Ireland's second major objection to the proposal concerns the continuing erosion to the small remaining national stock of undeveloped upland landscape, of which the subject site forms a small but significant part. It should be incumbent upon planning authorities to have, in the interests of the proper planning and sustainable development of their administrative areas, preference for less intrusive and more reversible uses of the wild lands in their jurisdiction.

Cognisance must be taken by developers and planning authorities of the effects of development on the landscape, not only within development sites, but also on the surrounding landscapes and environments. Mountaineering Ireland accepts that the land in question is privately owned, however the constitution recognises that private property rights are not absolute and should be balanced with the common good. Actions by a landowner which have adverse impacts on the landscape as a whole outside their property must be seen as being contrary to the long-term interests of society and should be subject to planning restriction. The small area of undeveloped upland landscape or wild land which remains in Ireland is a priceless national asset, the enjoyment of which for recreational or other sustainable uses, is vital to the physical, mental, recreational, emotional and spiritual well-being of the nation as a whole. This national capital should not be squandered by the location of industrial and other inappropriate and unsympathetic uses (which could be sited elsewhere in more appropriate and less damaging locations) in those vulnerable and precious places for the private benefit of a small number of private developers. The present proposal does just this.

2.3 Damage to recreational experience

The Dublin and Wicklow Mountains provide a vital recreation space for Dublin city, with the relatively natural and undeveloped character of the landscape delivering both physical and spiritual renewal. This value, and the increased demand for outdoor recreation activities, has been recognised in the formation of the Dublin Mountains Partnership to manage and develop recreation in the Dublin Mountains on a sustainable basis (2008), the publication of the Wicklow Outdoor Recreation Strategy which identified the Blessington area as a hub for outdoor recreation activity (2009), and the Feasibility Study on the Recreation Potential of the

Poulaphouca Reservoir (2010), which proposed a walking and cycling trail around the reservoir, the first section of which was developed during 2013.

As the representative body for Ireland's largest recreation user group, walkers, Mountaineering Ireland can say with certainty that the industrialisation of this landscape through the imposition of a very visible windfarm will detract from the quality of the recreation experience currently enjoyed in the Dublin Mountains and north-west Wicklow. This will undermine the significant public investment already made in recreation management and infrastructure, and the economic value that recreation and tourism bring to the area. Both the recreational and tourist uses are highly sustainable and can function as strong economic generators on an ongoing basis without significant landscape degradation and with a much wider spread of return to the local and national community both in financial and employment terms.

Mountaineering Ireland trusts that you will take these views into consideration when deciding on this application.

Yours sincerely



Karl Boyle
Chief Executive Officer

* **Mountaineering Ireland** is the representative body for walkers and climbers on the island of Ireland. Mountaineering Ireland is recognised as the National Governing Body for the sport of mountaineering by both the Irish Sports Council and Sport Northern Ireland. The term mountaineering refers to a spectrum of activities that includes: low level walking, hillwalking; rock and ice-climbing; bouldering and alpinism. Mountaineering Ireland (December 2013) has over 11,500 members comprising 161 clubs and 1300 individual members.

The work of Mountaineering Ireland includes advocating for the protection and responsible use of the mountain environment, as well supporting the development of our sport, providing a range of services to members and promoting safe practice and skills development amongst walkers and climbers.