



Irish Sport HQ
National Sports Campus
Blanchardstown
Dublin 15

Planning Department
Waterford City & County Council
Menapia Building
The Mall
Waterford City

13th March 2015

Re: planning application no. 1551: Ecopower Developments Limited, Ballymacarbry area

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 uplands 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.

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The current proliferation of windfarm applications in Ireland's upland areas is causing deep concern amongst Mountaineering Ireland members. It is becoming increasingly clear that a national, strategic approach is required to renewable energy development, which considers all of the costs associated with wind energy. Without this, there is grave risk that Ireland will destroy the character of its rural and upland landscapes for the commercial gain of a minority, with consequent long-term loss in terms of our national economy and the well-being of our people.

The Comeragh Mountains dominate the landscape of County Waterford and consequently they hold a special place in the hearts and minds of visitors and locals. The glacially-sculpted Comeraghs represent Waterford's greatest visual and recreational asset. Mountaineering Ireland is of the strong opinion that this proposal is undesirable from a visual and long-term planning point of view and because it would result in an unacceptable level of industrial development in this scenic rural area.

2. Observations on the proposed development

2.1 Visual intrusion

The proposed wind farm is located in the north-western foothills of the Comeragh Mountains, south of Clonmel and north of the village of Ballymacarbry.

Eight turbines, each with an overall height of up to 127 metres, constitute a major discordant element in this upland landscape and will be highly injurious to the visual amenity of this area. The turbines would be visible across a wide area, including the popular Knockanaffrin ridge walk, the Comeragh Plateau and the coums above the Nire Valley

This injury to visual amenity is significantly exacerbated by the industrial nature of the proposed use as a power generating plant in a strongly rural and forested landscape, which is also used for a range of tourism and recreational purposes. The incongruity and prominence of the windfarm would be intensified by the movement of the turbine blades in an otherwise still landscape.

These impacts are compounded by the service roads and other infrastructure that accompany wind turbines. The road widening and upgrading required to transport the turbines would significantly, and irrevocably, alter the character of the road network in this part of the Comeraghs.

The sudden intrusion of this industrial use in a scenic upland area would impose an unacceptable rate of landscape change. The future sustainable development of the Ballymacarbry area should embrace a measured evolution of its heritage, recreation, forestry and agricultural functions. The visual injury the proposed development would bring is simply too great.

2.2 Loss of undeveloped upland landscape

Mountaineering Ireland's second major objection to the proposal concerns the continuing erosion to Ireland's small remaining national stock of undeveloped upland landscape. Although it could be argued that the development site is forested and therefore already developed, it is adjacent to undeveloped mountain land and highly visible across a very wide area. 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. 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.

Mountaineering Ireland notes that the site in question is made up of both private and State-owned land (Coillte forestry), however the constitution recognises that property rights are not absolute and should be balanced with the common good. Actions by a landowner (public or private) 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 developers.

2.3 Damage to recreational experience

The Comeragh Mountains provide a vital recreation space for the population of Waterford, Dungarvan, Clonmel and the wider Munster area, with the relatively natural and undeveloped character of the landscape delivering both physical and spiritual renewal. The area surrounding the development site is used by local residents, domestic visitors and overseas tourists for a host of recreational purposes including trail-walking, hillwalking, horse-riding, angling and mountain-biking.

Some of the eight proposed turbines would be within 1km of the East Munster Way, which is part of the E8 European Long Distance Walking Route from Dursey Island in West Cork to Istanbul in Turkey. Fáilte Ireland research shows that in 2011 over 740,000 overseas visitors to Ireland claimed to have gone hiking or cross-country walking spending approximately €649m (Fáilte Ireland, 2014).

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 Comeragh Mountains.

This assertion is supported by research from Scotland which provides clear evidence that mountain-goers do not want to pursue their activity, and spend their money, in areas they regard as spoiled by industrial-scale windfarms. They are changing their behaviour to avoid such areas (MCoS, 2014).

2.4 Impact on wildlife

The importance of upland areas for biodiversity conservation is unquestionable, with numerous upland habitat types listed under Annex I of the EU Habitats Directive and many rare and threatened bird and animal species being associated with these habitats (Perrin et al, 2014)

Although the development site is not within the Comeragh Mountains Special Area of Conservation (SAC), or designated as a Special Protection Area for Birds (SPA), both the Nightjar (*Caprimulgus europaeus*) and the

Hen Harrier (*Circus cyaneus*) have been recorded within the site. Nightjar and Hen Harrier are listed as Annex 1 species under the EU Birds Directive (2009/147/EC) and protection of their habitat is a vital component for the conservation of both species. The planning application lacks sufficient research on the current status of these protected species and the likely impact of the proposed development on them.

It is undeniable that an industrial development of this scale, requiring extensive excavation and disturbance, will result in the loss and displacement of many less iconic plant and animal species. While they may not merit the higher legal protection, they are integral to a biotic community which is already under pressure from habitat loss, invasive species and the effects of climate change, and upon which all human life depends.

3. Conclusion

Approval of this application would result in an unacceptable impact, industrialising and devaluing a scenic rural landscape, as well as undermining the economic value that recreation and tourism bring to County Waterford. 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

Helen Lawless
Hillwalking, Access & Conservation Officer

***Mountaineering Ireland** is the representative body for walkers and climbers on the island of Ireland. 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.

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 wide spectrum of activities that includes walking, rambling, hillwalking, rock and ice-climbing, bouldering and alpinism. Mountaineering Ireland has over 11,550 members, comprising 174 clubs and approximately 1400 individual members (October 2014).

References

Fáilte Ireland (2014) *Fáilte Ireland Market Research 2013*, published by Fáilte Ireland, Dublin, online: <http://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/In%20Your%20Sector/Walking-Market-Research-2013.pdf>.

MCoS (2014) *Wind farms and changing mountaineering behaviour in Scotland*, published by Mountaineering Council of Scotland, available online: http://www.mcofs.org.uk/assets/pdfs/mcofs-wind-farm-survey-report_2014.pdf.

Perrin, P.M., Barron, S.J., Roche, J.R. & O'Hanrahan, B. (2014). *Guidelines for a national survey and conservation assessment of upland vegetation and habitats in Ireland*. Version 2.0. Irish Wildlife Manuals, No. 79. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht, Dublin, Ireland, available online: <http://www.npws.ie/sites/default/files/publications/pdf/IWM79.pdf>.