



Irish Sport HQ
National Sports Campus
Blanchardstown
Dublin 15

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

30th January 2015

Re: planning application no. 142198 - ABO Windfarm, Ballymanus Hill

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 142198 - ABO Windfarm, Ballymanus Hill

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. This is particularly the case in County Wicklow.

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.

Directors: P. Barron; D. Batt; F. Bradley; N. Hore; U. MacPherson; M. McKeever;
R. Millar; R. Ó Conchúir; P. O'Sullivan; I. Sorohan; D. Stelfox; U. Vejsbjerg; S. Walsh.
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In addition to those windfarms already visible across the landscape of south Wicklow, two significant developments have been granted permission, but not yet constructed, in close proximity to Ballymanus Hill (at Ballycumber to the west and Croghan Mountain to the south east). 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 at the southern end of the Wicklow Mountains, along the ridge of Ballymanus Hill and roughly parallel with the R747 road from Aughrim to Tinahely. The site location is highly visible across south Wicklow.

Twelve turbines, each with a height of up to 150 metres, constitute a major discordant element in this upland landscape and will be highly injurious to the visual amenity of this area. It is notable that the documents submitted with the application confirm that all 12 turbines in the development would be visible from many popular summits in south Wicklow including Lugnaquilla, Slievemaan, Croaghanmoira, Mullacor and Keadeen.

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 including trail-walking, hillwalking, orienteering, angling and horse riding. 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. In addition to their harsh visual impact, the windfarm service roads would facilitate easier access by off-road vehicles to fragile habitats; an activity that has resulted in damage to upland landscapes in Wicklow and other parts of Ireland.

The marked concentration of archaeological features on the south western spur of Ballymanus Hill, including two bivallate ringforts, provides direct evidence that this area has been important to, and respected by, people for many centuries. Were this proposal to be approved we would see these national monuments dwarfed by turbines and the character of this historic landscape altered to an unacceptable degree.

There is also likely to be injury to the residential amenities of people living in the vicinity of Tinahely and Aughrim 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 Ireland's small remaining national stock of undeveloped upland landscape, of which Ballymanus Hill forms a small but locally 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 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 Wicklow Mountains provide a vital recreation space for the population of the greater Dublin area and the south east, with the relatively natural and undeveloped character of the landscape delivering both physical and spiritual renewal. The value of, and the increased demand for, outdoor recreation activities, has been recognised in the publication of the Wicklow Outdoor Recreation Strategy (2009).

Section 2.1 highlights how this development would detract from the quality of the experience enjoyed by hillwalkers on Lugnaquilla and other mountains across south Wicklow. It would also be visible from many points along the Wicklow Way, Ireland's oldest long-distance walking route. The Wicklow Way is one of Ireland's most popular marked walking routes, and one of only five nationally considered to have the potential to reach international standard in the short-term (NTO, 2010, p.25).

The village of Tinahely has been designated by Fáilte Ireland as a hub for walkers and Tinahely Community Projects, a local voluntary group, has developed four looped walks in the area; the proposed development would be clearly visible from all these walks. Recreation and tourism are vitally important to Tinahely, and equally so in the Aughrim area.

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 south Wicklow.

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).

There is local evidence of this too. A Mountaineering Ireland affiliated club based in south Wicklow reported to us how a walk that the club previously enjoyed regularly was destroyed by the construction of a windfarm at Coolmeelagh near Carnew.

3. Conclusion

To add further wind turbines to the landscape of south Wicklow would result in an unacceptable cumulative impact, industrialising and devaluing a scenic rural landscape. Approval of this application would also undermine the significant public and community investment already made in recreation management and infrastructure in south Wicklow, 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



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***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 11,500 members, comprising 170 clubs and approximately 1400 individual members (October 2014).

References

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.

NTO (2010) *Setting New Directions – A Review of National Waymarked Ways in Ireland*, published by the National Trails Office / Irish Sports Council, available online http://www.irishtrails.ie/National_Trails_Office/Publications/Trail_Development/.

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